

## **APPENDIX B: FARMLAND CONVERSION IMPACT RATING FORMS**

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Any Federal action that results in conversion of farmland to a non-agriculture use requires coordination with the Natural Resources and Conservation Service (NRCS). Coordination has been accomplished through a Land Evaluation Site Assessment (LESA), which measures the relative value of farmland affected, and assigns a score according to set criteria. The evaluation includes direct and indirect conversion. The LESA provides a numerical score for assessing farmland conversion impacts, ranging from low score of 100 and to a high score of 260.

The Natural Resources Conservation Service assisted in filling out the following forms. Although Ottawa County does list land as locally important, the NRCS did not provide data on locally important land. There is no statewide important farmland in the study area. The total rating is not a sum of points but rather an evaluation of the entire alternative against the rating criteria. Impact ratings are based on a total scale of 0-260. The larger the rating, the greater the impact will be on the surrounding farmland.

<b>Summary Farmland Conversion Impact Ratings</b>					
<b>DEIS Alternative F/J1</b>					<b>FEIS Preferred Alternative, F-1a</b>
	<b>Segment C1</b>	<b>Segment C6</b>	<b>Segment C4</b>	<b>Segment C7</b>	
<b>Total Points</b>	195	166	120	179	99.5

Prime and Unique Farmlands are discussed in **Section 4.2**.

# FARMLAND CONVERSION IMPACT RATING FOR CORRIDOR TYPE PROJECTS

<b>PART I (To be completed by Federal Agency)</b>		3. Date of Land Evaluation Request <b>6/28/09</b>	4. Sheet 1 of <b>1</b>
1. Name of Project <b>US-31 FEIS</b>		5. Federal Agency Involved <b>FHWA</b>	
2. Type of Project <b>Transportation</b>		6. County and State <b>Ottawa County, Michigan</b>	
<b>PART II (To be completed by NRCS)</b>		1. Date Request Received by NRCS <b>6/28/09</b>	2. Person Completing Form <b>THOEN</b>
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form). YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		4. Acres Irrigated <b>7866</b>	Average Farm Size <b>121</b>
5. Major Crop(s) <b>Corn, Blueberries, Specialty</b>	6. Farmable Land in Government Jurisdiction Acres: <b>238400</b> <b>65%</b>	7. Amount of Farmland As Defined in FPPA Acres: <b>92400</b> <b>25%</b>	
8. Name Of Land Evaluation System Used <b>LESA</b>	9. Name of Local Site Assessment System <b>NONE</b>	10. Date Land Evaluation Returned by NRCS <b>3/18/08</b>	

PART III (To be completed by Federal Agency)	Alternative Corridor For Segment			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	<b>305</b>			
B. Total Acres To Be Converted Indirectly, Or To Receive Services	<b>49</b>			
C. Total Acres In Corridor	<b>354</b>	<b>0</b>	<b>0</b>	<b>0</b>

<b>PART IV (To be completed by NRCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland	<b>14</b>			
B. Total Acres Statewide And Local Important Farmland	<b>101</b>			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	<b>0.11</b>			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	<b>63</b>			
<b>PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)</b>	<b>45.5</b>			

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))		Maximum Points			
1. Area in Nonurban Use	15	<b>11</b>			
2. Perimeter in Nonurban Use	10	<b>7</b>			
3. Percent Of Corridor Being Farmed	20	<b>0</b>			
4. Protection Provided By State And Local Government	20	<b>20</b>			
5. Size of Present Farm Unit Compared To Average	10	<b>0</b>			
6. Creation Of Nonfarmable Farmland	25	<b>0</b>			
7. Availability Of Farm Support Services	5	<b>5</b>			
8. On-Farm Investments	20	<b>6</b>			
9. Effects Of Conversion On Farm Support Services	25	<b>3</b>			
10. Compatibility With Existing Agricultural Use	10	<b>2</b>			
<b>TOTAL CORRIDOR ASSESSMENT POINTS</b>	<b>160</b>	<b>54</b>	<b>0</b>	<b>0</b>	<b>0</b>

<b>PART VII (To be completed by Federal Agency)</b>					
Relative Value Of Farmland (From Part V)	100	<b>45.5</b>			
Total Corridor Assessment (From Part VI above or a local site assessment)	160	<b>54</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL POINTS (Total of above 2 lines)</b>	<b>260</b>	<b>99.5</b>	<b>0</b>	<b>0</b>	<b>0</b>

1. Corridor Selected: <b>Corridor A</b>	2. Total Acres of Farmlands to be Converted by Project: <b>115.8</b>	3. Date Of Selection: <b>6/28/09</b>	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
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5. Reason For Selection:  
**We have selected Corridor A because there will be less impacts to farmland, wetland, and ROW acquisitions.**

Signature of Person Completing this Part: Stephane Kgleng DATE: 6/28/09

NOTE: Complete a form for each segment with more than one Alternate Corridor

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## **APPENDIX C: COORDINATION LETTERS**

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## **C.1 RESOURCE AGENCY COMMENTS AND RESPONSES**

U.S. Department  
of Transportation  
  
United States  
Coast Guard



Commander  
Ninth Coast Guard District

1240 E. Ninth St.  
Cleveland, Ohio 44199-2060  
Staff Symbol: (obr)  
Phone: 216-522-3993  
16590  
Ser. B-203/rwb  
26 October 1994

Mr. Scott A. Cook, A.S.L.A.  
Surface Transportation Division  
Greiner, Inc.  
3950 Sparks Drive, S.E.  
Grand Rapids, Michigan 49546

Dear Mr. Cook:

We have reviewed the information submitted to us concerning the proposed construction of a new bridge in Grand Haven, Michigan.

Comments provided by Mr. Nick Mpras at the August meeting are indicative of Bridge Administration Program requirements. Specifically, to reiterate, the Draft Environmental Impact Statement shall address, impacts associated with new bridge crossings, boat traffic data, classification of vessels, frequency of bascule bridge openings, and optimization of proper vertical clearances of a new bascule bridge to effectively reduce the number of openings required. Relative to classification of vessels, it will be incumbent upon the State of Michigan to perform a survey of vessels to determine the height of sailboat masts in the area to establish what vertical clearance will be required for a fixed bridge should such a design be proposed. The same data then can be utilized to determine bascule bridge height to effectively reduce opening requirements.

There is no question that a dual bridge needs to be constructed adjacent to the existing U. S. 31 Bridge in Grand Haven. Such a structure will provide relief to vehicular traffic and, in particular, during those times when the existing structure may become inoperable in the open position. Concerning the best location for any bypass structure to be constructed to the east, the alternatives being considered and impacts associated with each crossing have been satisfactorily addressed.

As you are aware, the Coast Guard's role in this process is to represent the needs of navigation and assure that, no matter which crossing site is proposed, those needs are not neglected. The Coast Guard's position is not one to determine whether or not a particular crossing is needed or will provide more vehicular benefit than any other crossing site. The determination for need is best served by those agencies and officials who represent the various modes of land traffic. However, when each of the crossing sites is addressed, Mr. Mpras stated that it will be beneficial if the DEIS contains a matrix to summarize impacts, both positive and negative.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert W. Bloom, Jr.", with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

**United States Coast Guard (USCG), October 26, 1994**

Comments from the USCG were received in 1994, 1998 and 2007. The 1994 comments were incorporated into modifications of alternatives developed for the Draft Environmental Impact Statement (DEIS).

1. The Michigan Department of Transportation (MDOT) conducted a bascule bridge study during a two-week period between August 3 and August 16, 1995. The USCG issued a preliminary statement as a result of this study's survey, indicating:
  - The height of any new or replacement moveable structure must allow the passage of at least 75 percent of current river traffic without an opening, and;
  - The height of any new fixed span structure must allow 100 percent of all current river traffic to pass under it.

This survey was updated in 2001 to verify the number, height, and type of vessels likely to navigate the river. The revised survey indicated that the typical vessel that would not be able to navigate a 45-foot underclearance would be a barge or tugboat from a local business, with an occasional sailboat. Most other tall vessels are restricted by a railroad bridge located downstream (west) of US-31 and the existing bascule bridge.

The Preferred Alternative does not include improvements to the existing US-31 bascule bridge, and there will be no impacts affecting bridge height. MDOT staff worked with USCG staff to determine an appropriate underclearance. The agreement reached by the two agencies on November 14, 2007 was that an underclearance height of 35 feet would "best serve the taxpayer and yet provide for navigation needs, present and future on the Grand River."

U.S. Department  
of Transportation  
  
United States  
Coast Guard



Commander (obr)  
Ninth Coast Guard District  
1240 East Ninth Street  
Cleveland, Ohio 44199-2060

Phone: (216) 902-6084  
FAX: (216) 902-6088

16590  
Ser. B-145rwb  
8 December 1998

Mr. Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P. O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Lopez:

This refers to the Draft Environmental Impact Statement and Section 4(f) Evaluation which addresses the US-31 from I-196 in Allegan County North to I-96 in Muskegon County project.

We have reviewed the subject document, specifically that portion which addresses the Grand River in Grand Haven and bridge construction proposals for crossing that waterway, and have determined it meets the requirements of the U. S Coast Guard as relate to NEPA. Further, each of the proposals, with final selection not yet determined, provides adequate navigational clearances for existing and prospective navigation. The clearances as proposed are based upon previous studies accomplished by the Michigan Department of Transportation and input from this office as relates to navigation.

As a cooperating agency, we thank you for providing the document for our review and will continue to provide comments and data to assist in developing a project to meet the increasing needs of vehicular and vessel traffic.

Sincerely,

A handwritten signature in dark ink, reading "Robert W. Bloom, Jr." with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

**United States Coast Guard (USCG), December 8, 1998**

No response required.

**United States Coast Guard (USCG), October 17, 2007**

>>> "Bloom, Robert" <Robert.W.Bloom@uscg.mil> 10/17/2007 9:49:28AM >>>  
Good Morning,

I have reviewed the file for the proposal, with the file going back to 1996 when a week-long meeting was held in Grand Haven to discuss the possibilities of replacing the U.S. 31 bascule bridge in Grand Haven and the construction of a bypass structure near 120th Street, upriver from the U.S. 31 Bridge. The several meetings held that week were attended by the mayor and city manager of Grand Haven, a few council members, Regine Beaubeouf of the MDOT with several of her staff members and Jim Kirschensteiner of the Federal Highway Administration, a Corps of Engineers representative and a few other state and federal agency representatives. I attended the meetings, as did Mr. Nick Mpras from Coast Guard Headquarters in Washington, D.C., Bridge Program Administrator for the Coast Guard's nationwide bridge program. During that week, we discussed replacement of the U.S. 31 Bridge and a replacement bascule bridge with a vertical clearance of 45 feet in the closed position was discussed. That figure, being greater than now exists, would provide passage of at least seventy-five percent of the boats without requiring the bridge to be opened and cause traffic backups. However, because of the length of the approaches required for a bridge at that height, it was determined it would be less impactive to businesses and homes, and Spring Lake in particular, to consider a replacement bridge with clearances as now exist at the 31 bridge. One of the proposals was to construct a replacement bridge of a fixed design, but to provide for boating it would have to have a vertical clearance of 60 feet, at a minimum. That proposal quickly was put to rest due to the extent of negative impacts that would have occurred to businesses and homes.

The other subject of discussion during the week was the bypass bridge, subject of your email below. Initial thoughts were that if a bypass bridge were constructed, it would be of a fixed design and possibly require a minimum vertical clearance of sixty (60) feet. However, after doing a survey of the boats using the waterway and those that potentially could use the upper reaches of the waterway, it was determined by the Coast Guard that a bridge of forty (40) feet vertical clearance would provide for existing and prospective navigation. That figure was agreed to by the MDOT and the FHWA. As part of the discussions concerning the bypass bridge and its location, we were provided a boat and crew by Coast Guard Station Grand Haven to do an inspection by water of the proposed crossing site and to be able to go ashore at the crossing site and do a "walk-around" inspection. That inspection trip further reinforced the fact that a fixed bridge with 40 feet vertical clearance was feasible and would be the best alternative for a bypass structure, and would provide for the needs of both vessel and land traffic.

Since the time of the meeting, there have been personnel changes at the city, state and federal level and the proposal is being viewed in somewhat different light from those various offices and agencies. However, from the perspective of the Coast Guard, nothing has changed as relates to navigation upon the Grand River, the potential for future use, and our obligation to maintain and enforce the federal regulations under which our Bridge Administration Program operates.

Based upon the results of the week-long meeting in 1996, and the fact that nothing has changed since that time to bring about a change in clearance requirements, I advise you that we are firm on our requirement for a clearance of not less than forty feet for a fixed bridge at the proposed crossing site. Navigation trends and numbers of boats using any given waterway may change somewhat every few years, going up or down in number and type of usage, but overall there is an average consistency of usage and that is what we have to consider when looking at the existing and prospective navigation needs and requirements.

At the time of the meeting in 1996, it was stated that the proposed projects in the area would be a long time in coming to a development stage due to the state not having funding to match federal dollars. What changes have there been since that time for the state to now commit funding to match federal dollars and make the projects, or just the bypass bridge, financially viable?

Bob

Robert W. Bloom, Jr.  
Bridge Program Manager  
Ninth Coast Guard District  
1240 East Ninth Street  
Cleveland, Ohio 44199-2060  
Tele: 216-902-6085  
Fax: 216-902-6088

**Response to United States Coast Guard (USCG), October 17, 2007**

-----Original Message-----

From: WEERSTRAV@michigan.gov [mailto:WEERSTRAV@michigan.gov]  
Sent: Wednesday, November 07, 2007 3:22 PM  
To: Bloom, Robert  
Cc: Dennis Kent; Carlson, Kurt; Striffler, Scot  
Subject: RE: US-31 Bypass @ Grand River

Mr. Bloom:

Thank you for responding to our request for clarification of the vertical clearance requirements for the planned new Grand River crossing near 120th Avenue in Ottawa County. I understand your concern over accommodating vessel traffic on the river; however, at this point on the river, it appeared from our previous discussions in May of this year, that something less than 40 feet would accommodate the anticipated river traffic. Also, a few miles upstream, vessel passage is limited by the 68th Avenue structure which has a vertical clearance of approximately 24 feet.

Based on discussions at the meeting held in 2005 with, MDOT staff, river users, US Army Corps of Engineers and Coast Guard staff, it appeared that 30-35 feet of clearance would be adequate. That finding was again reviewed in a conversation in May 2007 with you and your staff. In addition, it was MDOT's understanding that the 35 foot maximum clearance proposed in May was verified by your staff during a survey in the area.

Since the 1996 meetings, MDOT selected a Preferred Alternative (F/J-1) for the US-31 Bypass project, which included the referenced new river crossing; cost was estimated at approximately \$1 Billion. Based on discussions in 2005 and 2006 with local officials, assessing their priorities and state highway needs, MDOT developed a revised Bypass proposal. The revised alternative is still on the F/J-1 alignment, but limited to connecting M-45 and I-96 including the same river crossing scenario, near 120th Avenue. The required Final Environmental Impact Statement will be submitted to FHWA in early 2008, reflecting this modified Preferred Alternative, estimated at approximately \$150 Million. Based on anticipated state and federal funding availability, including federal earmarked funds from US Representative Hoekstra, MDOT plans to begin construction of the new river crossing in 2010. MDOT's ability to match federal aid was never an issue in 1996 and will not be an issue in 2010.

Preliminary design engineering will begin shortly for the new river crossing. MDOT can develop those plans based on 40 feet of vertical clearance, if that is the requirement. However, the 35 foot clearance level would reduce visual and environmental impacts, as well as costs. It is MDOT's responsibility to identify reasonable and feasible opportunities to more cost effectively spend federal and state transportation funds. Therefore, we would appreciate your consideration of reducing the required vertical clearance to 35 feet, based on the user information obtained to date. Please let us know the process that needs to be followed to request and implement the reduced clearance standard.

Thank you for your assistance. Please contact me if you need additional information on this project.

Vicki Weerstra  
Associate Region Engineer-Development  
MDOT-Grand Region  
616/451-3091

**United States Coast Guard (USCG), November 14, 2007**

Message from "Bloom, Robert" <Robert.W.Bloom@uscg.mil> on Wed, 14 Nov 2007 09:44:37 -0500 -----

To: <WEERSTRAV@michigan.gov>

cc: "Carlson, Kurt" <Kurt.A.Carlson@uscg.mil>, "Striffler, Scot" <Scot.M.Striffler@uscg.mil>

Subject: RE: US-31 Bypass @ Grand River

Vicki,

We again have gone through the file information concerning the construction of a new bridge near 120th Street. While the originally established forty feet vertical clearance was based upon agreement of all parties early on in the process, from what now has been presented, we feel the thirty-five (35) feet vertical clearance will be workable. We do understand that the difference between the 35 and 40 feet is not a nickel and dime difference and feel that the lower clearance will best serve the taxpayer and yet provide for navigation needs, present and future, on the Grand River.

Since we are the permitting federal agency for the project, and obviously a cooperating agency in the NEPA process, we would very much appreciate receiving a copy of the Draft EIS and the upcoming Final EIS.

Bob

ROBERT W. BLOOM, JR.  
Bridge Program Manager  
Ninth Coast Guard District  
1240 East Ninth Street  
Cleveland, Ohio 44199-2060  
tele: 216-902-6085  
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U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2025  
Cleveland, OH 44199-2060

Phone: (216) 902-6087  
FAX: (216) 902-6088

16590  
B-048/sms  
May 18, 2009

FEDERAL HIGHWAY ADMIN.

MAY 20 2009

MICHIGAN DIVISION  
LANSING, MICHIGAN

David Williams  
Environmental Programs Manager  
Federal Highway Administration – Michigan Division  
315 W. Allegan, Room 201  
Lansing, Michigan 48933

Dear Mr. Williams:

I am responding to your letter dated May 7, 2009 and the attached preliminary Final Environmental Impact Statement (FEIS) regarding the U.S. 31 Holland to Grand Haven project in Ottawa County, Michigan, and request for cooperating agency comments.

The preliminary FEIS contains all prior correspondence from the Coast Guard and adequately addresses the coordination conducted so far in determining preliminary navigation clearances for the preferred alternative. The navigation clearances discussed in the FEIS, specifically the vertical clearance requirement for a new bridge across Grand River in the vicinity of 120<sup>th</sup> Street, should reflect the proper Low Water Datum (LWD) elevation – referred to IGLD1985 - for that section of Grand River. We have consulted with the U.S. Army Corp of Engineers and determined that the proper LWD elevation is 577.8 feet. Please ensure that future design clearances and engineering drawings that may be submitted with a federal bridge permit application utilize this elevation for LWD reference. This letter also serves as a reminder that the 35-foot vertical navigation clearance is a preliminary clearance pending the comments that may be received by the Coast Guard following the issuance of a Coast Guard Public Notice.

There is also discussion in the FEIS concerning the placement of a temporary bridge over Grand River to facilitate construction of a new permanent bridge. Details of the temporary bridge must also be included in a possible future bridge permit application to the Coast Guard.

Please feel free to contact me at (216) 902-6087 to discuss this project or answer any questions or concerns. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Scot M. Striffler".

SCOT M. STRIFFLER  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

DEPARTMENT OF THE ARMY  
DETROIT DISTRICT, CORPS OF ENGINEERS  
BOX 1027  
DETROIT, MICHIGAN 48231-1027

October 28, 1994

IN REPLY REFER TO

Construction-Operation Division  
Regulatory Functions Branch 94-050-010-0 A

Michael O'Malley, Environmental Coordinator  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. O'Malley:

Reference is made to the U.S. 31 scoping document, US-31 Location Design Study; Allegan, Ottawa, and Muskegon Counties, Michigan, and to the Natural Environment Biological Assessment, both dated "September 1994," provided to this office on behalf of the Michigan Department of Transportation (MDOT) concerning State Projects 93-0341 and 94-0759; Federal Project No. DPR 0045(001). The bypass is a portion of the reconstruction and relocation of U.S. Highway 31 from Holland, Michigan north over the Grand River in or near Grand Haven, Michigan.

This letter provides the U.S. Army Corps of Engineers (USACE) comments on these documents and acknowledges the first concurrence point under joint Federal Highway Administration (FHWA), USACE procedures under Section 404 of the Clean Water Act.

1. All of the proposed alternatives would involve discharges of dredged or fill material in navigable waters (the Grand River) and adjacent wetlands and would require a permit from USACE. The permit for the bridge(s) would be processed by the Coast Guard, while attendant features, such as shoreline stabilization, and approaches through wetlands adjacent to the Grand River would be permitted by USACE.

2. USACE maintains the Federal navigation channels in the Grand Haven Harbor and in the Grand River. The navigation channel depth at the existing US 31 bridge is 18 feet deep and supports barge and recreational craft, including fairly large sailboats harbored in the Grand River and in Spring Lake. The Grand River channel is 100 feet wide and maintained to an eight foot depth. This channel supports barge traffic. We suggest that any bridge piers be placed a minimum distance of 10 feet from the edge of the channel. Thus the minimum span would be 120 feet between bridge piers. Maps describing these Federal channels are available in the Detroit office. The point of

-2-

contact is Mr. Wayne Schloop, Acting Chief, Operations and Maintenance Branch at 313-226-6796.

3. USACE policy requires that all practicable alternatives which avoid and minimize impacts to special aquatic sites including wetlands be thoroughly analyzed. Past permit applications reviewed by this office that did not avoid or minimize wetlands to the maximum practicable extent have generally been denied. We note that the alternatives within Grand Haven using the existing alignment pose the least wetland impact. In addition to selecting the least damaging alignment, design options may also be used to reduce wetland impacts. These can include adjustments in road alignment and the use of clear spans to pass over wetland areas. We note that estimated bridge costs are nearly identical for each alternative crossing of the Grand River. Extensive wetlands are present at the Grand River, particularly at the Robbins Road and Eastern Corridor crossings. Consideration should be given to additional spans to cross wetlands fringing the Grand River. This should considerably reduce wetland impacts. Also, USACE and the Michigan Department of Natural Resources (permit numbers 90-050-008-2 and 90-9-312, respectively) have required construction of a wetland mitigation area directly under the proposed Central Corridor crossing. This permit was issued to Joe Walsh/Lake Michigan Contractors, Inc. A marked copy of Sheet C-10 is enclosed for your reference. A review of our records also shows there is a National Register historic site (Spoonville site, #73002158) between the Central Corridor alignment and Crockery Creek.

3

4. Once it is established that wetland impacts have been avoided and minimized to the maximum practicable extent, compensatory mitigation will be considered. For a project of this type and magnitude, compensatory wetland mitigation would likely be required. We assume that any wetlands affected by the project would be replaced at a replacement ratio of greater than one for one based on acreage or on functions and values. We note that no estimate of costs for wetland mitigation is included in the preliminary design costs for alternative plans. These costs are likely to be extensive and must be estimated prior to the selection of the most reasonable alternatives. A copy of the Detroit District's Mitigation Policy is enclosed for your reference. We also offer the following additional comments on mitigation:

a. We strongly prefer that mitigation be in-kind and within the watershed where impacts occur. Specifically, impacts in the Black River (Macatawa Creek) watershed should be compensated for within that watershed; impacts to wetlands fringing the Grand River should be replaced along the Grand River. In contrast, a

4

-3-

single mitigation site excavated from uplands would likely be unacceptable to this office.

4

b. We prefer that compensatory mitigation be accomplished in areas that were formerly wetlands, such as disturbed areas along the Grand River or areas that have been affected by past hydrologic modifications. We feel these areas have a greater chance for successful wetland mitigation than areas excavated from uplands.

5

5. Based on our knowledge of traffic patterns in the Grand Haven, Michigan area and on established planning for enhancing the US 31 corridor along the Lake Michigan shoreline in Michigan, this office concurs with the purpose and need for this project, which is to provide additional capacity on US 31 between Holland and Grand Haven, Michigan. We agree that a new crossing over the Grand River with additional capacity is needed in the near future. We will require considerable additional information regarding improved traffic movement and relative environmental impact, particularly wetland impacts and proposed compensatory mitigation, before we can comment on which alternatives are most reasonable. One sub-alternative which is not considered in the scoping document is to extend the Robbins Road crossing beyond M-104 to I-96 (about three miles). It appears such an extension would allow traffic to bypass Spring Lake and relieve likely congestion on M-104, a two-lane arterial road.

6

We appreciate the opportunity to provide comments regarding this scoping document for the planned Environmental Impact Statement. Should you have any questions on this matter, please contact Tom Allenson at 313-226-2222.

Sincerely,

**ORIGINAL SIGNED BY**

Gary R. Mannesto  
Chief, Regulatory Functions Branch  
Construction-Operations Division

Enclosures

copies furnished:

Compliance and Enforcement Section, w/ encl. Sh. C-10  
Grand Haven Area Office, R. Kittleman, w/ encl. Sh. C-10  
Norman Stoner, FHA, Lansing, MI, w/encls.  
Scott Cook, Greiner, Inc., Grand Rapids, MI, w/encls. ✓  
K. Eckert, MISHPO, w/ Encl. Sh. C-10

**United States Department of the Army Corps of Engineers (USACE), October 28, 1994**

Comments from the USACE were received in both 1994 and 1999. The 1994 comments were incorporated into modifications of alternatives developed for the DEIS. The 1999 comments are addressed later in this chapter. The following information includes updates from the DEIS, related to the 1994 letter:

1. Comment acknowledged and addressed. Mitigation and permit requirements for the proposed Grand River crossing of the Preferred Alternative are discussed in **Section 4.22**.
2. The Preferred Alternative no longer includes construction of a replacement crossing for the existing US-31 Bridge between Grand Haven and Ferrysburg.
3. The new crossing of the Grand River included in the Preferred Alternative crosses the entire Grand River, adjacent wetlands and adjacent floodplain. In addition, because the soils in the area are poor, the number of substructures will be minimized and span lengths maximized. The Preferred Alternative impacts 2.55 acres of wetland, as compared to the 89.96 expected to be impacted by Alternative F/J1.
4. Wetland mitigation sites were identified in accordance with the watershed, as requested, including adjacency to the Grand River. See **Section 4.9** for discussion on the proposed wetland mitigation for the Preferred Alternative.
5. Wetland mitigation sites were sought in accordance with these desires and met, including adjacency to the Grand River. The areas previously impacted will return to a natural state. See **Section 4.9** for discussion on the proposed wetland mitigation for the Preferred Alternative.
6. Concurrence with Purpose of and Need for the project and the need for an additional Grand River crossing are acknowledged. The need for the project is discussed at length in **Section 2**. The traffic analysis for the Preferred Alternative is in **Section 2.2**. The local Grand Haven Bypass did consider the Robbins Road extension, but was relocated south, to Comstock Street, after numerous meetings with and input from local community members. However, it did not meet Purpose of and Need for the project as well as the Preferred Alternative.



DEPARTMENT OF THE ARMY  
DETROIT DISTRICT, CORPS OF ENGINEERS  
BOX 1027  
DETROIT, MICHIGAN 48231-1027

February 1, 1999

IN REPLY REFER TO

Construction-Operations Division  
Regulatory Branch  
File No. 94-050-010-1

Mr. Ron Kinney, Manager  
Environmental Section  
Project Planning Division  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Kinney:

This letter provides comments on the Draft Environmental Impact Statement (DEIS) for US Highway 31 from I-196 in Allegan County to I-96 in Muskegon County, Michigan. The DEIS is dated October 23, 1998 and regards State Project Number 33955 and Federal Project Number DPR 0045(001). A variety of alternatives involving a range of improvements on the existing right-of-way, to new freeway or boulevard crossing of the Grand River, with and without local bypasses for the cities of Holland, Zeeland, and Grand Haven are discussed in the DEIS.

Need for a Corps Permit. As you are aware, a permit from the Corps of Engineers will be required for any structure or discharge of fill material in the Grand River and its adjacent wetlands. The Grand River is the only navigable water body scheduled to be affected by the various alternatives. A permit for work in non-navigable waters and in other wetlands will be required from the Michigan Department of Environmental Quality (MDEQ). The DEIS states that portions of the Grand River may be dredged or temporarily filled to allow equipment access for bridge construction. We request that you provide plans and work descriptions for bridge construction which include provisions for equipment access when an application for a Department of Army permit is submitted to our office.

Uncertain future of barge channel upstream of Grand Haven. A staff economist with our Detroit District staff had a telephone conversation with URS/Greiner regarding navigation interests in the Grand River in September, 1998. The Corps wishes to note that although the 17 mile long, eight foot deep, barge channel has recently been dredged, no barge traffic is using the river at this time. One firm that the Corps is aware of has indicated that they may use the channel for transporting scrap steel in the

-2-

future. The Corps is performing an assessment of the economic benefits of maintaining the barge channel and may consider abandoning this channel in the future. Required bridge clearances, particularly in the 120th Street corridor, could be affected.

Alternatives. The description of TSM alternatives is unclear regarding the fate of the existing bascule bridge in Grand Haven. On page 3-2 the DEIS states that "the existing bascule bridge would also be retained with the TSM alternatives." But in describing the TSM 2020 alternative on page 3-4, the DEIS states that "... a new structure at the existing US-31 Grand River crossing would be constructed." We understand that the existing bascule bridge would be replaced with either a new bascule bridge or a new fixed span bridge in all alternatives other than "No Action" and "TSM 2005."

In reviewing the alternatives studied, we wonder if a hybrid of freeway and boulevard alternatives could avoid the need of a local bypass at Grand Haven. The local bypass of Grand Haven would only remove 17,400 vehicles a day from US-31, while disturbing a sizeable portion of the city and creating an unsightly crossing over a State Game Area with extensive wetlands associated with river channels. What would the level of service be in Grand Haven if a freeway were constructed up to Grand Haven and a six lane boulevard were constructed through the portion of existing US-31 in the city? How much congestion in Grand Haven is acceptable given the options of a freeway across the entire city at an average cost of \$22 million per mile?

Regarding alternatives which were eliminated during the study, we find the DEIS is unclear in describing how an eight lane boulevard option in Grand Haven (Alternative C) was discarded. The statement on page 3-44 that "...eight lane boulevards are not desired" does not explain how the alternative was eliminated. We understand that widening US 31 would result in a large increase in property conversions in Grand Haven, but the DEIS does not discuss how this take was determined to be unacceptable.

We concur in eliminating Alternatives K,L, and M (all of which involve a Grand River crossing at 84th Street in the Eastern Corridor. The DEIS notes these alternatives would have only a minimal impact on US-31 traffic volumes while causing high levels of impacts to farmland in rural townships, and substantial wetland, floodplain, and wildlife impacts.

Wetlands. Wetland impacts seem very high for the length of the highway segment under study in this DEIS. We note that

-3-

Alternative R has the lowest take of wetland acreage. However, Alternative R likely will subject the 120th Street Corridor of heavy development pressure which could result in secondary and cumulative impacts to wetlands as well as to farm lands. Alternative A has the second lowest wetland take of the DEIS alternatives, and all direct impacts would be in areas adjacent to an existing heavily traveled four lane highway. It seems reasonable that the functions and values of the wetlands along existing US-31 are limited, as seems to be brought out in the wetland assessment discussion in the DEIS.

6

Wetland impacts for most alternatives may actually decrease through avoidance techniques in the final design stage since the DEIS assumes all wetlands identified within the proposed right-of-ways will be destroyed. We also note that the scope of wetland impacts may increase for the local Grand Haven bypass alternatives as more detailed information on how equipment can access the new bridge pier sites becomes available. The DEIS notes that wetlands and shallow water areas may have to be dredged to allow barge access. Also temporary fills may be needed to allow land based equipment access.

7

We agree with the MDEQ that impacts to a high quality wetland complex along the Pigeon River can be avoided by eliminating Alternative F.

8

Wetland Mitigation. All wetland mitigation plans must contain clearly stated objectives, criteria for judging success, and provisions to allow for corrective actions during development of new wetland areas. Also, all mitigation sites should be preserved permanently as natural resource areas under conservation easements or equivalent commitments. We agree with the practice of looking for interested owners of "prior converted wetland" property. Field checks of these properties are needed to determine if any areas have reverted to wetland conditions due to the abandonment of crop production. The Corps considers prior converted lands to be abandoned if wetland conditions return and no commodity crop has been produced for five years. Aerial photos provided in the DEIS show that agricultural crops have been produced recently on most of the properties identified as prior converted lands. Wetland determinations should be conducted on sites which have not been recently cropped, such as Grand River Site #2, which is described as fallow old field (page 6-46).

9

We note that Grand River Site #4 is the only site close to the Grand River. We suggest that more effort be put in locating potential sites within the Grand River floodplain so that impacts to wetlands associated to the Grand River itself may be more

10

-4-

adequately compensated for. If dredging and/or filling of Grand River wetlands is considered necessary to construct the local bypass option for Grand Haven, sufficient wetland mitigation credit for Grand River wetland impacts may not be available.

10

Alternatives to be Carried Forward for Detailed Study. The Corps of Engineers has not provided concurrence on Alternatives to be Carried Forward for Detailed Study. It appears that Alternative F might be eliminated. Before further narrowing the available alternatives, we wish to review information regarding the potential of a hybrid of Alternatives A and C through Grand Haven. Further, we would like to review estimates of wetland avoidance that might be possible through adjustments in highway design for various alternatives.

11

Should you have any questions, please contact Thomas E. Allenson at the above address or telephone (313) 226-2221. Please refer to File Number: 94-050-010-1.

Sincerely,



Gary E. Mannezzo  
Chief, Regulatory Branch  
Construction-Operations Division

Mr. Gerald Fulcher, MDEQ  
Mr. Jim Kirschensteiner, FHWA  
Mr. Mike MacMullen, USEPA; ATTN. Sherry Kamke

**United States Department of Army Corps of Engineers (USACE), February 1, 1999**

Comments from the USACE were received in both 1994 and 1999. The 1994 comments were incorporated into modifications of alternatives developed from the DEIS. The response to the 1999 comments is presented below.

1. Comment acknowledged. **Section 4.22** discusses the permits that may be required for construction. The FEIS proposes bridges that span the entire floodplain of the Grand River. The need for filling and dredging of the Grand River floodplain and floodway has been minimized to the fullest extent possible by recommending fewer substructures and longer spans. **Section 4.20.1** discusses the River Bridge Construction in detail. The method of construction will be decided either at the time of design or by the contractor, but prior to submitting for the permit.
2. Comment acknowledged. The Coast Guard has indicated, since the DEIS, that a minimum clearance height of 35 feet for a fixed span bridge at the new alignment Grand River crossing is reasonable. The Preferred Alternative provides this clearance over the navigation channel.
3. The Preferred Alternative no longer affects the Bascule Bridge in Grand Haven.
4. The alternatives near the referenced State Game Area have been eliminated from further consideration. The Preferred Alternative includes a new alignment paralleling 120th Avenue. This alternative includes improvements in Holland Township and the City of Grand Haven along existing US-31 and a new bridge over the Grand River. Non-freeway alternatives without bypasses of Grand Haven would require an 8-lane boulevard through the City of Grand Haven to provide an acceptable level-of-service. A detailed analysis of an 8-lane boulevard through Grand Haven was not recommended because:
  - Approximately 38 residential and 49 commercial displacements would occur.
  - Weaves lanes required for local traffic using US-31 to move only one block to the north or south.
  - Additional lanes for pedestrians to cross would limit accessibility and decrease safety in crossing US-31.
  - Opposition from the Cities of Grand Haven and Ferrysburg.
  - Does not meet the Purpose of and Need for the project.
  - Could not independently maintain long-term congestion relief.
5. See response to 4 above and **Chapter 3** discusses the alternatives considered.
6. The impact to wetlands associated with the Preferred Alternatives have been reduced since the DEIS (see **Table 4.9-1** in **Chapter 4**) from 89.93 acres to 2.55 acres. The Preferred Alternative no longer has the highest number of wetland impacts, due to modifications made to avoid and minimize impacts.
7. As stated in the previous response, the amount of impacted wetlands has been reduced from 89.93 acres to 2.55 acres since the DEIS. The local Grand Haven bypass has been eliminated from further consideration. Construction methods, such as dredging are discussed in **Section 4.20**.
8. The Preferred Alternative no longer directly impacts the Pigeon River.
9. **Section 4.9** Discusses State and Federal Wetland Mitigation Requirements, it describes in detail the criteria used in determining feasible wetland mitigation sites. All of the proposed mitigation sites have been reviewed and approved by the Resource Agencies as acceptable.
10. Mitigation for wetland for the new Grand River crossing has been adequately identified in **Section 4.9**.
11. The USACE has since provided concurrence on the "Alternatives to Be Carried Forward". The hybrid noted in the letter was eliminated from further consideration for the reasons discussed in item 4 above. Additionally, substantial wetland impact reduction was achieved by realignment and design modifications the Preferred Alternative.



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
DETROIT DISTRICT, CORPS OF ENGINEERS  
477 MICHIGAN AVENUE  
DETROIT MI 48226-2550

July 8, 2009

Engineering & Technical Services  
Regulatory Office  
Permit No. LRE-1994-500101

David Williams  
Environmental Programs Manager  
FHWA- Michigan Division  
315 W. Allegan, Room 201  
Lansing, MI 48933

Dear Mr. Williams:

This letter provides comments on the Preliminary Final Environmental Impact Statement, dated April 27, 2009, for US Highway 31 Holland to Grand Haven project in Ottawa County, Michigan, which is a revision of the original project study; the Draft Environmental Impact Statement (DEIS) for US Highway 31 from I-196 in Allegan County to I-96 in Muskegon County, Michigan. The Corps commented on previous stages of this overall project on October 28, 1994 and on February 1, 1999. Subsequently, the Corps attended a meeting on October 19, 2006 regarding the "120<sup>th</sup> Avenue corridor" crossing of the Grand River, and the "M-231" proposal from M-104 to M-45, as well as a field visit to potential wetland mitigation sites on November 12, 2007.

The Corps of Engineers interests include using the FEIS approval process to streamline the National Environmental Policy Act (NEPA) Clean Water Act Section 404 permitting process, and to assure that the FEIS completes as much agency coordination as possible prior to the submittal of any permit application.

NEPA/404 "streamlining"

The Corps concurs with the revised Purpose and Need statements, and the range of alternatives under study in the preliminary FEIS. After review of the revised suite of alternatives, and reduced work in aquatic sites, the Corps of Engineers agrees that the preferred alternative of creating the M-231 highway on new right-of-way meets the Purpose and Need statement and appears to be the least damaging practicable alternative. We would like to review opportunities for further minimization of wetland and aquatic impacts that might be possible should highway design proceed.

-2-

Consultation on Endangered Species and Historic Properties

The Corps encourages your agency to complete any necessary consultation under the Endangered Species Act and the National Historic Preservation Act during the completion of the Final Environmental Impact Statement, so that consultation is as complete as possible for impact sites and any potential wetland mitigation sites.

Navigation

The selected alternative includes a bridge crossing of the Grand River over the Federal navigation channel. We concur with statements at page 4-91 of the Preliminary FEIS, that a 35-foot vertical clearance and a horizontal span of at least 160 feet (a clearance of at least 30 feet to either side of the 100 foot wide channel) are sufficient for our interests. The project designer must coordinate with our Detroit District Office to accurately locate the navigation channel to develop permit and construction drawings.

Wetlands

The Michigan Department of Environmental Quality (MDEQ) takes primary Section 404 jurisdiction for inland waters not in or adjacent to federal navigable waters. A permit for impacts to navigable waters and adjacent wetlands is required from the Corps of Engineers as well as from MDEQ. Proposed work that would require a permit from our agency would include any structures, dredging, or discharge of fill material in the Grand River, and appears to include any discharges in wetlands adjacent to the Grand River, Wetlands C and D, as identified on pages 4-67 and 4-68 of the preliminary FEIS.

Wetland Mitigation

Mitigation wetlands should provide replacement of wetland services lost at project impact sites. All wetland mitigation plans must contain clearly stated objectives, criteria for judging success, and provisions to allow for corrective actions during development of new wetland areas. Also, all mitigation sites should be preserved permanently as natural resource areas under conservation easements or equivalent commitments. We agree with the practice of looking for interested owners of "prior converted wetland" property. We are also in favor of expanding Wetland C by removing fill from former riverside residences along Limberlost Lane. These sites, with proper removal of old fill material and adequate control of nuisance plant species, should closely reproduce lost functions since they were once part of the Wetland C complex. It appears that approximately half of the preferred alternative wetland impacts would occur in Wetlands C and D, and the Corps again encourages wetland mitigation in former wetlands adjacent to the Grand River, such as the Bolthouse property (page 4-77). While the Roger's Property is near the Grand River floodplain, it is unclear how a Great Lakes Marsh could be created with no actual connection to the river. Wetland delineations must be performed for

-3-

proposed mitigation sites, and data sheets in conformance with the Corps of Engineers Wetland Delineation Manual and the appropriate approved regional supplement must be supplied to this office.

Thank you for the opportunity to comment on these extensive changes to the earlier DEIS. Should you have any questions, please contact Thomas Allenson at the above address or telephone 313.226.2221. Please refer to File Number: LRE-1994-500101.

Sincerely,



John Konik  
Chief, Regulatory Office  
Engineering and Technical Services





Copy Furnished:





IN REPLY REFER TO:

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

East Lansing Field Office (ES)  
1405 South Harrison Road, Room 502  
East Lansing, Michigan 48823

October 27, 1994

James Kirshensteiner  
U.S. Department of Transportation  
Federal Highway Administration  
315 West Allegan Street, Room 211  
Lansing, Michigan 48933

Re: Comments to Project Scoping Information Package: US-31 Location Design Study, Holland to Grand Haven, Ottawa, Allegan, and Muskegon Counties, Michigan

Dear Mr. Kirshensteiner:

This is in response to your request of September 19, 1994 for U.S. Fish and Wildlife Service (Service) comments on the subject document and concurrence on the first sign-off juncture of purpose and need, pursuant to the Interagency Consensus Agreement on Concurrent NEPA/404 Processes for Transportation Projects.

#### Fish and Wildlife Coordination Act Comments

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.) and are consistent with the U.S. Fish and Wildlife Service Mitigation Policy (46 FR 7645) and the National Environmental Policy Act (NEPA) of 1969 (P.L. 92-190; 83 Stat. 852-856) as amended. These comments do not represent the views of the U.S. Department of the Interior on any forthcoming environmental statement.

#### General Comments

High rates of traffic congestion, delays, and accidents currently occur on US-31 between Grand Haven and Holland, Michigan. Michigan Department of Transportation (MDOT) has prepared a Location Design Study to address these concerns. An environmental impact statement (EIS) is being prepared.

The referenced Project Scoping Information Package addresses five potential alignment alternatives to improve and upgrade traffic flow between Grand Haven and Holland:

- A. No Build.
- B. Western Corridor, which is generally within the existing U.S.-31 alignment.
- C. Robbins Road/144th Avenue Corridor (Grand Haven By-Pass).

D. Central Corridor (120th Avenue By-Pass).

E. Eastern Corridor (84th Avenue by-Pass).

Transportation Systems Management (TSM), Mass Transit, and Intelligent Vehicle Highway Systems (IVHS) alternatives are also briefly addressed.

#### Purpose and Need

The existing bascule bridge on U.S.-31 at Grand Haven experiences occasional "lock-up" due to electrical and mechanical failure resulting in significant vehicular congestion. Traffic levels of service in the more heavily traveled section during peak periods are ranked as "F" by the Michigan Department of Transportation (MDOT) and deemed unacceptable. According to MDOT pavement management evaluations, most of U.S.-31 has "zero" remaining pavement service life and is in need of rehabilitation or reconstruction. Accident rates in various urban segments of U.S.-31 are more than twice the average rates for comparable cross section roads in west Michigan. Finally, increased traffic volumes are projected in the future. Without significantly increasing the capacity to carry traffic across the Grand River in Grand Haven, mobility within Ottawa County will be negatively affected.

The U.S. Fish and Wildlife Service concurs with the purpose and need of the proposed project. The Service will reserve comments on the next juncture of the NEPA/404 Process, "alternatives to be carried forward for detailed study", until we have received and reviewed the forthcoming EIS.

#### Wetland Impacts

Broad leaf deciduous hardwood forest, emergent, and scrub-shrub wetland habitat types have been identified within the project area. These wetlands provide various fish and wildlife species food, water, cover from predators, and shelter during severe weather. These wetlands also filter debris, pollutants, and sediments from surface water runoff and flood waters. The western corridor alternative will impact between 8 and 15 hectares (19-37 acres) of wetlands, the central corridor will impact between 20 and 53 hectares (49-132 acres), the eastern corridor will impact between 21 and 66 hectares (53-164 acres), while the Robins Road corridor will impact 17 hectares (42 acres). All corridor alternatives involve a high proportion of forested wetlands.

The Service has determined these forested wetland habitat to be of high value for resident wildlife species, fish, and migratory birds and to be relatively scarce or becoming scarce on a national basis or in the ecoregion. In accordance with the Service's Mitigation Policy, our mitigation goal for these wetlands is no net loss of in-kind habitat value. Due to its value and relative difficulty in successfully mitigating this type of wetland, the Service would encourage an alignment alternative that minimizes impacts to forested wetlands, even at the expense of additional impacts to other types of wetland habitat.

In accordance with the Wetlands Executive Order 11990, wetland impacts should be first avoided and then minimized to the fullest extent possible. In addition, any wetlands unavoidably destroyed during the proposed activity should be compensated for by enhancing existing low quality wetlands or creating wetlands equivalent to those destroyed in another location adjacent and/or contiguous to an existing wetland system. Therefore, an alignment alternative that utilized existing roadways and thus minimize wetland impacts would be preferred over a route on new alignment. The forthcoming EIS should more precisely disclose potential wetland impacts for the alignment alternatives considered and address how unavoidable losses would be offset. In addition, non-alignment options such as Transportation Systems Management, Mass Transit Options, and Intelligent Vehicle Highway Systems should be fully addressed.

3

#### Wetland Mitigation

The Service suggests that in order to expedite the project and avoid delays, a comprehensive wetlands habitat mitigation plan be developed that fulfills Service mitigation goals and be provided for advance agency review and inclusion in the DEIS. The plan should include the following:

- o The exact location of habitat mitigation sites (If there are no exact sites, where are the likely sites?).
- o A commitment for on-site wetland mitigation. If on-site mitigation is impossible, it should be within the watershed of the wetland impact.
- o A replacement ratio for wetlands impacted of at least 1.5 to 1.
- o Site plans that include a 30 meter (100 foot) perimeter buffer adjacent to habitat mitigation sites.
- o A commitment for wetland habitat creation before highway construction begins.
- o A no net loss of in-kind habitat value for any forested wetlands destroyed and a no net loss of habitat value while minimizing loss of in-kind habitat value for any emergent and shrub/shrub wetlands destroyed, in accordance with the Service Mitigation Policy.
- o A commitment to monitor the progress of the mitigation wetland habitat following their construction for a period of 5 years.
- o A timetable for the habitat monitoring that includes the time of year and the frequency of sampling.
- o Performance criteria to measure habitat success.
- o Steps to be taken to correct or improve the biological productivity of the proposed wetland mitigation habitats are spelled out.

4

- o The sponsor's commitment to submit annual monitoring reports to the Michigan Department of Natural Resources and the Service.
- o The sponsor's commitment to the establishment of a protection and management plan in perpetuity for the wetland habitat mitigation areas.

We welcome the opportunity to review draft wetland habitat mitigation plans.

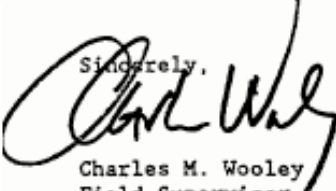
Endangered Species Act Comments

The U.S. Fish and Wildlife Service (Service) concurs with the finding that no federally listed or proposed species occurs within the area of the subject project. This presently precludes the need for further action on this project as required under section 7 of the Endangered Species Act of 1973, (the Act) as amended. The Service advises, however, that should a species become officially listed or proposed before completion of this project, the federal action agency for the work would be required to reevaluate its responsibilities under the Act. Further, should new information become available that indicates listed or proposed species may be present and/or affected, consultation should be initiated with the Service.

Since threatened and endangered species data is continually updated, new information pertaining to this project may become available which may modify these recommendations. Therefore, the Service recommends your agency annually request updates to this list.

Federal candidate species likely to be in the project vicinity are the Kirtland's snake (*Clonophis kirtlandii*) and the lake sturgeon (*Acipenser fulvescens*). Candidate species are currently under review by the Service for consideration as endangered or threatened. Candidate species have no protection under the federal Endangered Species Act and a determination of "may affect" for candidates does not require preparation of a biological assessment or consultation with the Fish and Wildlife Service. Candidate species are included as advance notice to federal agencies or their designees of species which may be proposed and listed in the future. If early evaluation of your project indicates that it is likely to adversely impact a candidate species, your agency may wish to request technical assistance from this office.

We appreciate the opportunity to provide these comments and look forward to continued coordination with your agency. Any questions can be directed to Mark Hodgkins at this office at (517) 337-6650.

Sincerely,  
  
 Charles M. Wooley  
 Field Supervisor

cc: Michigan Department of Transportation, Lansing, Michigan (Attn: Andy Ziegler)  
 Michigan Department of Natural Resources, Wildlife Division, Lansing, MI (Attn: Tom Weise)  
 U.S. Environmental Protection Agency (WQW-16-J) Chicago, IL (Attn: Mike Mac Mullen)  
 Michigan Department of Natural Resources, Land & Water Management Div., Lansing, MI (Attn: Peg Bostwick)  
 ARD, Twin Cities, MN (AES/DHC) Attn: Bob Krska

**United States Department of the Interior, Fish and Wildlife Service (USFWS), October 27, 1994**

Comments from USFWS were received in both 1994 and 1999. The 1994 comments were incorporated into modifications of alternatives developed for the Draft Environmental Impact Statement (DEIS). The 1999 comments are addressed later in this chapter.

Concurrence on Purpose of and Need for the project acknowledged.

Comment acknowledged. The number of wetlands impacted by the Preferred Alternative is now 2.55 acres (compared to 89.96 acres identified in the DEIS). The number of forested wetlands impacted is 0.27 acres (compared to 60.31 acres identified in the DEIS).

The area of wetlands impacted by the Preferred Alternative is 2.55 acres and the area of forested wetlands impacted is 0.27 acres. Where the alignment could not be relocated, bridging versus filling of wetland areas was done. TSM, Transit Alternatives, as well as ITS technologies, were included in the review of Practical Alternatives since the DEIS.

1. Wetland mitigation sites were sought in accordance with these desires and met. See **Section 4.9** for discussion on the proposed wetland mitigation for the Preferred Alternative. Of the five sites, one is located on land owned by the Ottawa County Parks Department and will be incorporated into their proposed large regional park and Macatawa Greenway project. A second of the five has been acquired by MDOT because the opportunity arose for purchase. The other three will be acquired when they become available or as part of the project.
2. Acknowledge receipt of concurrence on their being no federally listed or proposed species within the Preferred Alternative corridor in 1994. With an updated species list and new available information, consultation with the USFWS is ongoing to produce a more recent evaluation.
3. MDOT last updated the list of federally threatened & endangered species within the project area on May 3, 2007 with the use of the USFWS' website.
4. Neither of these species is currently listed as federal candidate species for Ottawa County by the USFWS. Additionally none were found within the area of the Preferred Alternative through numerous surveys.



IN REPLY REFER TO:

Realty

**United States Department of Interior  
BUREAU OF INDIAN AFFAIRS**

MICHIGAN AGENCY  
FEDERAL SQUARE OFFICE PLAZA  
2901.5 I-75 Business Spur  
SAULT STE. MARIE, MICHIGAN 49783-3519  
(906) 632-6809 Phone  
(906) 632-0689 Fax

AUG 23 1994

Greiner, Inc.  
Attn: Scott Cook  
3950 Sparks Drive S.E.  
Grand Rapids, MI 49546

Re: Proposed Improvement of Highway U.S.-31

Dear Mr. Cook:

Thank you for informing the Bureau of Indian Affairs of the upcoming scoping meeting concerning the improvements proposed for Highway U.S.-31 in Ottawa County, Michigan. As our Acting Realty Officer, John Haarala, stated, at this time, there would be no Indian lands affected by any such improvements. The Michigan Agency recently was informed of the addition of three new Federally recognized tribes, one of which is located in close proximity to Ottawa County. As these new tribes begin acquiring lands, it is possible that they may purchase land which may be impacted by improvements to other highway corridors. Therefore, would you please put our office on your mailing list so that we may be apprised of future developments. Thank you for your concern on this matter.

If you should have any questions or require additional information, please feel free to contact the Agency Realty Section at the above number.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerald F. Parish".

Gerald F. Parish

**ACTING** Superintendent

cc: Michael O'Malley  
Regine Beauboeuf

1

**United States Department of Interior, Bureau of Indian Affairs (BIA), August 23, 1994**

1. Comment acknowledged. BIA office added to the mailing list. BIA will be contacted if any of the remaining eleven archaeological sites to be surveyed are found to impact Native American lands or resources.

UNITED STATES DEPARTMENT OF AGRICULTURE  
Agricultural Stabilization and Conservation Service  
Ottawa County ASC Committee  
16731 Ferris Street  
Grand Haven, MI 49417  
Telephone: 842-5852

October 28, 1994

Scott Cook  
Environmental Planner  
Greiner, Inc.  
3950 Sparks Drive, S.E.  
Grand Rapids, MI 49546

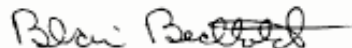
Dear Mr. Cook,

This letter is sent in regards to the scoping meeting and documents provided on the US-31 project.

I wish to thank your agency for the opportunity to comment on the proposed project. I was very impressed with your approach and the response of other agencies. I am sure this will make the decision process easier.

I have discussed this topic and distributed the material with other Agricultural leaders in Ottawa County. To make this letter short and to the point I will summarize the discussions and decision. LEAVE US-31 WHERE IT IS. Fix if you have to but leave the agricultural corridor alone. Ottawa County is a fast growing urban area. This is taking it's toll on a nonrenewable resource, mainly precious good fertile growing land. Using your figures, the amount of traffic diverted from the existing corridor would be limited. Can we really justify the cost involved in building a new corridor thru the heart of the best ag ground in the county. The feeling of the agricultural sector is no. Yes I know it is a view that has bias. By fixing the existing US-31 it would take less land, disrupt less people, and would accomplish the task with less money. We did not address the problem with the Grand river crossing in Grand Haven as it was not our task to solve that problem. Everyone agrees that really is one of the main problems trying to be addressed with this study.

Again thank you for allowing our input into the process. If I can be of further assistance to your project please feel free to contact me.



Sincerely,  
Blain Becktold  
County Executive Director  
Ottawa County ASCS

**United States Department of Agriculture (USDA), October 28, 1994**

Comments from the USDA were received in both 1994 and 1999. The 1994 comments were incorporated into modifications of alternatives developed for the DEIS.

Comment acknowledged



United States  
Department of  
Agriculture

Natural  
Resources  
Conservation  
Service

Michigan State Office  
1405 South Harrison Road Rm 101  
East Lansing, MI 48823-5243  
517-337-6701 (t); 517-337-6905 (f)

November 12, 1998

SUBJECT: Proposed US-31 Improvements

Mr. Jose Lopez  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

We received the Draft Environmental Impact statement for the proposed improvements to US-31 from I-196 in Allegan County to I-96 in Muskegon County.

Of the alternatives presented, we support Alternative A which is the new freeway on the existing US-31 corridor. This alternative would have the least impact on prime and unique farmlands. We do not support the alternatives which require a new US-31 corridor east of the existing highway. Not only do these alternatives directly convert more acres of prime and unique farmlands, but the associated future development would also impact farmlands.

Disturbed areas should be seeded during and after construction to reduce the potential for soil erosion. For further information on seeding mixtures and rates, please contact:

Jack Sage  
Resource Conservationist  
16731 Ferris St.  
Grand Haven, Mi. 49417-9601

We appreciate the opportunity to review and comment on this proposed project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane E. Hardisty".

Jane E. Hardisty  
State Conservationist

cc: Jack Sage, NRCS, RC, Grand Haven, MI

JEH:lcs:eis31doc 190-13-15

The Natural Resources Conservation Service  
works hand-in-hand with the American people  
to conserve natural resources on private lands

AN EQUAL OPPORTUNITY PROVIDER AND EMPLOYER

**United State Department of Agriculture (USDA), November 12, 1998**

Comment acknowledged. Alternative A did not meet the Purpose of or Need for the project as well as the Preferred Alternative due to the strong community objections from the City of Grand Haven and City of Holland. The primary reason for opposition is due to the significant community impacts resulting from the loss of numerous commercial and residential buildings. Alternative A also does not provided additional access over the Grand River. Significant efforts were expended in order to avoid and/or minimize impacts to prime, unique and other locally important farmland for the Preferred Alternative. Prime farmland was reduced from 342.38 to 105 acres impacted, unique farmland was reduced from 14.60 to zero acres impacted, other farmland was reduced from 512.49 to 105 acres.

1. Adequate soil erosion control will be addressed through MDOT's Approved Soil Erosion and Sedimentation Plan.



U.S. Department of Housing and Urban Development  
Midwest - Grand Rapids Area Office  
Northbrook Office Plaza, Building #2  
2922 Fuller Avenue, NE  
Grand Rapids, Michigan 49505-3499



August 25, 1994

Scott Cook  
Environmental Planner  
Greiner, Inc.  
3950 Sparks Drive, S.E.  
Grand Rapids, MI 49546

Dear Mr. Cook:

SUBJECT: EIS, Improvement of U.S.31  
Allegan, Ottawa, and Muskegon Counties

Thank you for the opportunity to comment on the proposed EIS for the location design study being undertaken for the affected areas noted above.

HUD's concern will lie with any existing or currently proposed federally assisted housing adversely affected by the various alternatives under consideration. In addition to the potential environmental impact of the project, we will also be concerned with possible marketability and property value issues.

We are interested in the further development of your plans and may have additional comments as more definitive information is made available. Mr. Daniel Doane, Environmental Advisor for our office, is your contact person and can be reached at (616) 456-2111 if you have any questions.

Sincerely,

  
Janet Matthews  
Chief, Valuation Branch

**United State Department of Housing and Urban Development (HUD), August 25, 1994**

1. No federally assisted housing is adversely affected by the Preferred Alternative. Specific information regarding residential displacements and efforts to assist those displaced is found in **Section 4.1.2**. MDOT has also performed and produced a “Conceptual Stage Relocation Plan” for this project that further clarifies issues related to this concern. The Conceptual Stage Relocation Plan is found in **Appendix E**.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**JAN 21 1999**

REPLY TO THE ATTENTION OF  
B-19J

Mr. James A. Kirschensteiner, PE  
Federal Highway Administration  
315 West Allegan  
Room 207  
Lansing, Michigan 48933

Dear Mr. Kirschensteiner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for US-31 from I-196 in Allegan County North to I-96 in Muskegon County.

We have received your letter dated November 9, 1998 requesting that EPA provide concurrence and comments regarding the second NEPA/Section 404 concurrence point "Alternatives Carried Forward." Although U.S. EPA has agreed to utilize the NEPA/404 Process for this project, it has not yet provided written concurrence on the "Purpose and Need for the Proposed Action" or on the "Alternatives to Be Carried Further."

Several alternatives were evaluated in the DEIS, including No Action, two Transportation Systems Management (TSM) Alternatives (Low Capital Improvement Alternatives), five Limited Access Freeway Alternatives with and without bypasses for the Holland and Grand Haven areas, two Controlled Access Boulevard Alternatives [both utilizing the existing US-31 alignment and the addition of a new local Grand Haven bypass] and an Uncontrolled Access Boulevard Alternative [utilizing the existing US-31 alignment and increasing the capacity of 120<sup>th</sup> Avenue]. Except for the No Action and 2005 TSM alternatives, each of the alternatives will have impacts to wetlands, woodlands, wildlife, and agricultural land. All but the No Action, 2005 and 2020 TSM alternatives would have significant impact on wetlands, as well as natural and historic resources and communities.

Based on our review of the information provided in the DEIS for this project, we have rated the present DEIS as EO-2. The "EO" means that we have environmental objections with the proposed action, and the "2" means that additional information needs to be provided in the Final Environmental Impact Statement (FEIS). From a NEPA perspective, we have issues with the level of detail of information that is documented in the DEIS in the areas of Purpose and Need and Range of Alternatives. Furthermore, it appears that wetland impacts under all but a few

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alternatives would be significant. Based on our review of Title 40 of the Code of Federal Regulations (CFR) Section 230, the substantive requirements related to the protection of wetlands and other special aquatic sites have not been met. Based on the information provided in the DEIS and the significance of the above-mentioned issues, our agency believes that substantial additional information will need to be submitted in subsequent environmental documentation. Our detailed comments on the DEIS are attached.

We are anxious to further discuss this letter with you and other interested parties in further detail. If you would like to arrange a conference or if have any questions, please contact Sherry Kamke of my staff at (312) 353-5794.

Sincerely,

*for Sherry A. Kamke*  
Al Fenedick, Acting Manager  
Environmental Review Group  
Office of Strategic Environmental Analysis

cc: Mr. Jeff Suxby, PE  
Michigan Department of Transportation  
Design Division  
425 West Ottawa Street  
Lansing, Michigan 48933

U.S. Environmental Protection Agency Region 5 Comments on the  
Draft Environmental Impact Statement and Section 4(f) Evaluation for  
US -31 from I-196 in Allegan county North to I-96 in Muskegon County

**Purpose and Need**

The Purpose and Need for the project is not consistently and clearly stated in the DEIS. U.S. EPA would like to provide concurrence on the project's purpose and need but before we can do so we need to have a clearly specified Purpose and Need Statement. The section in the DEIS, Section 2: Purpose of and Need for the Proposed Action, is a 13-page description of the existing problems with traffic congestion and automobile collision history of the US-31 study area. In the Summary portion of Section 2: Purpose of and Need for the Proposed Action, it appears that the Purpose and Need for the project is to reduce traffic congestion and improve safety for the traveling public. In Section 2.1.3 (Purpose of the Proposed Action) and Section 2.3 (Conclusion), the DEIS states that "If no action is taken to decrease demand or improve capacity and operational characteristics along US-31, unacceptable traffic delays are projected to occur at the majority of intersections. In order for US-31 to provide a safe and efficient means of local and regional travel, capacity must be increased or demand decreased for US-31, particularly at the Grand River."

1

It is clear that unacceptable conditions with traffic congestion and automobile collisions are occurring in the US-31 corridor. However, there is not sufficient clarity regarding the project's purpose and need for U.S. EPA to provide concurrence on this point. In the statements listed above there is a sufficient level of ambiguity to hamper further analysis. For example the first statement, "reduce traffic congestion and improve safety for the traveling public" is the least specific statement and it does not point to the locations of any specific problem area. The second statement, "The primary purpose and need for the proposed project is to alleviate congestion on the existing route, to rebuild the existing route and to improve safety and service," focuses on travelers utilizing the existing alignment. This statement seems to favor the highway build alternatives that utilize the existing alignment for US-31. The last statement, "capacity must be increased or demand decreased for US-31, particularly at the Grand River," is the broadest Purpose and Need Statement which allows for the widest range of possible alternatives. This statement opens the door for alternatives that address both capacity increases OR alternatives that utilize demand management strategies for the US-31 corridor. Furthermore, it emphasizes that the project alternatives should focus on providing relief in one area, the Grand River.

2

Since the Purpose and Need Statement sets the stage for the range of possible alternatives, it is important to have this point clarified in all subsequent NEPA/404 documentation.

The DEIS states that existing and forecasted conditions for the US-31 corridor indicate that without increased capacity or decreased demand within the corridor, mobility within Ottawa County will be negatively affected. Although it is clear that a problem exists today in the corridor, without additional information documenting how conditions in the corridor were projected, the reader is left to question if the problem of future congestion problems is being

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understated or overstated. Therefore, U.S. EPA recommends that additional information detailing how forecasted conditions for the US-31 corridor were determined should be included in the forthcoming environmental documentation. The DEIS states that the Existing (1997) Peak-Hour Levels-of-Service values were determined by using Highway Capacity Software (HCS). No explanation was given to explain how Design year (2020) LOSs were determined. The EIS could be improved by including a short summary of the HCS software and its application. Information such as the purpose of the software, history of its use, inputs/outputs and assumptions made, along with a reference to more information would be useful information to include.

3

### **Alternatives**

The alternatives evaluated in the DEIS included No Action, two Transportation Systems Management (TSM) Alternatives (Low Capital Improvement Alternatives), five Limited Access Freeway Alternatives on various alignments, utilizing various combinations of new and existing right-of-way, with and without bypasses for the Holland and Grand Haven areas, two Controlled Access Boulevard Alternatives [both utilizing the existing US-31 alignment and the addition of a new local Grand Haven bypass] and an Uncontrolled Access Boulevard Alternative [utilizing the existing US-31 alignment and increasing the capacity of 120<sup>th</sup> Avenue].

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The DEIS does not give the Transit and Intelligent Transportation Systems (ITS) alternatives equal development compared to those listed above. The suitability of these alternatives for satisfying the project's purpose and need in conjunction with other alternatives should be further discussed in the forthcoming environmental documentation. The DEIS evaluates only the ability of a fully implemented transit alternative in providing an acceptable LOS in the year 2020 if it is used by itself. Although it may be true that a fully implemented transit alternative may not provide an acceptable LOS in the year 2020 by itself, the effectiveness of these alternatives in reducing traffic congestion in the US-31 corridor should not go unevaluated. The effectiveness of a fully implemented Intelligent Transportation System (ITS), transit alternatives, pedestrian and bicycle alternatives, along with enhanced intermodal facilities or elements of these in combination, have the potential for reducing travel demand enough that it could affect the selection of other build alternatives.

The DEIS states that components of a proposed transit and an ITS alternative are recommended for inclusion with the remaining "Alternatives Under Consideration." We strongly recommend that the effectiveness of these other measures to reduce travel demand in the US-31 study area be fully evaluated in the subsequent environmental documentation. This analysis should be used to show what combination of highway build and transit/ITS alternatives may be effective for meeting the project's purpose and need. U.S. EPA believes that this level of detail is necessary in order to demonstrate that the least environmentally damaging practicable alternative (LEDPA) under Title 40 of the Code of Federal Regulations (CFR) Section 230 is being selected.

**Environmental Consequences**

**Wetlands Assessment -**

The wetlands assessment documented in the DEIS is well done for this stage of the project. However, it indicates that a substantial and significant loss to wetlands (between 48 - 90 acres), particularly forested wetlands (between 30 and 60 acres), could occur if any one of the build alternatives (all but the No Action, 2005 TSM and 2020 TSM) is implemented. Our agency considers these resources valuable and impacts to them should be avoided and minimized wherever possible.

4

In addition, Section 230.10 of U.S. EPA's 404(b)(1) guidelines state that five basic requirements must be satisfied before a 404 permit can be issued for a project. In particular, the alternatives analysis provided in the DEIS does not demonstrate that there are no other practicable alternatives that satisfy the purpose and need of the project while having less adverse impact on the aquatic environment. As discussed in the Alternatives section, it appears that some combination of alternatives such as the 2020 TSM along with key components of the ITS and transit alternatives could satisfy the purpose and need for the project (adequate LOS in the year 2020). This could significantly reduce the wetland impacts. U.S. EPA also believes that the filling of 47 to 90 acres of wetlands (30 to 60 of which are forested wetlands) may be in the range of a significant degradation to waters (including wetlands) of the U.S. under 40 CFR Section 230.10(c).

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U.S. EPA recommends that subsequent environmental documentation focus on the context and scope of wetland impacts and their consequences for water quality. In order for NEPA and 404 (b)(1) guidelines to be fully addressed, every attempt should be made to develop an alternative that effectively meets the purpose and need for the project while avoiding and minimizing impacts to wetland resources (both direct and indirect). For nonwater dependent projects, the applicant of the 404 permit must demonstrate LEDPA alternative has been selected for project implementation. Unless a compelling LEDPA argument is made for Alternatives F/J1 (90 acres), J1 (76.8 acres), P w/ B2b (61.4 acres), P1r w/ B2b (61.4 acres), F1/F3 w/ P1r (58.9 acres), A (54 acres) and R (47.6 acres), these alternatives would be unacceptable relative to an effective TSM alternative because of their direct impact to wetlands.

**Indirect and Cumulative Impacts -**

Section 1502.16 of the Council on Environmental Quality (CEQ) implementation regulations for NEPA requires a discussion of environmental consequences associated with alternatives evaluated in an Environmental Impact Statement. This analysis should include direct effects, indirect effects and cumulative impacts. The direct effects of the alternatives are evaluated in the majority of the DEIS. Indirect impacts were analyzed in the DEIS and documented in Section 5.2.3. This section includes a fairly extensive analysis centered on projected land use changes resulting in the implementation of the various alternatives. These land use changes were depicted in a series of maps showing areas that would experience urban influence. The secondary impact analysis went a good step forward by projecting probable impacts of this land

use change to the environment (agricultural land, wetlands, and water quality). We agree with the assessment that many of the build alternatives have a high potential of contributing to wetlands losses due to secondary impacts. The potential for impacts to wetlands may be greater from secondary impacts than from the direct impact of the highway project. U.S. EPA recognizes that some of the forecasted wetlands losses would be significant due to secondary effects with the most significant losses likely to be from Alternatives F1/F3, F/J1, and R (then F, J1 and P/P1r). We believe that an improved cumulative impact analysis for wetlands losses could help to substantiate the LEDPA demonstration.

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The DEIS makes a comment regarding cumulative impacts that we believe needs to be clarified. Section 5.2.3 states that cumulative impacts are those impacts related to the natural environment or the human community structure that occur due to the changes in land use. While this statement is not inaccurate, we believe the definition needs to be expanded. The CEQ defines cumulative impact to be the impact on the environment which results from the incremental impact of the actions when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.

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Although we agree that cumulative impacts related to water quality, ground water, wetlands, ecological systems, cultural resources and human community structure for this study area would be directly related to the secondary impacts on land use (to which this project would likely contribute), we do not want to equate the two types of impacts. Specifically, we think that the DEIS provides an adequate assessment of likely secondary or induced land use changes as a result of the alternatives. However, we do not believe that Section 5.2.3 provides a complete cumulative impact analysis because it does not provide enough information on the past impacts to water quality, groundwater, wetlands, ecological systems, cultural resources and human community structure. The U.S. EPA would like additional information regarding the cumulative effect of this action, along with others, on wetlands losses and water quality degradation. We believe that these areas have been identified by various resource agencies as being particularly vulnerable resources in the study area. This analysis should be provided in the forthcoming environmental documentation.

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Comparable Format -

The table used to summarize the impacts associated with each of the alternatives (Table 1.3-1) could be improved by adding a section that provides an assessment of each alternative's effectiveness in satisfying the purpose and need for the project. The projected 2020 LOS would be a good evaluation indicator to include in this table.

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**United States Environmental Protection Agency (USEPA), January 21, 1999**

1. The Purpose of and Need for the proposed action, has been clarified based on these comments, discussions during the December 6, 2001 and November 2006 Resource Agency Meetings. **Section 2.1** of the FEIS provides further explanation and clarification of the Purpose of and Need for the project. Throughout the EIS process, MDOT has sought concurrence from the Resource Agencies (USEPA, USACOE, USFWS, USCG and MDEQ) on the three concurrence points; "Purpose and Need", alternatives to be carried forward, and the Preferred Alternative.
2. See response to Comment 1.
3. The methodology used to project the 2030 traffic volumes is described in **Section 2.2.3** of the FEIS.
4. A discussion on transit is included in **Section 3.4** of the FEIS, although a stand-alone transit alternative was dismissed, it is expected that transit service will continue to attract new riders, as the area grows. Transit systems are encouraged, but analysis of area travel patterns suggests that transit is not a viable alternative, nor would a fully developed transit system reduce congestion to eliminate the need for build alternatives. Much of the study area is rural; therefore, it is not practical or feasible to expect travel volumes to be reduced to levels that will address the issues related to the project due to dispersed travel patterns.

The Preferred Alternative will likely include an Intelligent Transportation Systems (ITS) component. Development of a county-wide or region-wide ITS Plan is needed prior to implementation of a corridor specific plan along US-31 in Ottawa County. A Transportation System Management (TSM) Alternative was also studied but did not meet the Purpose of and Need for of the project. The TSM Alternative is a short-term solution, including low capital cost improvements. Since publication of the DEIS in 1999, several TSM projects have been completed along the corridor including intersection improvements and signal progression.

5. The number of wetlands impacted by the Preferred Alternative has been reduced from 89.96 acres to 2.55 acres through avoidance and minimization modifications of the alignment. **Section 4.9** includes a discussion on the wetland mitigation plans. Where the alignment could not be relocated, bridging versus filling of wetland areas was utilized
6. MDOT pursued innovative options and met extensively with concerned citizens and public agencies, and took time to address the concerns raised in response to public and agency comments during and after the development of the DEIS and after the Public Hearing. MDOT led the development of an assessment of indirect impacts through an innovative research study conducted by Michigan State University's Basic Science and Remote Sensing Initiative. The study paired observations of historic land use changes with anticipated population and employment growth projections to determine potential land use changes in the future (2020). The study concluded that the intense pressure for growth and development in the area is due to the robust regional economy. The corridor alternatives therefore have a limited impact on the future location of land development, due to the fact that local governments control land use through zoning and master plans.
7. See response to Comment 6.
8. See response to Comment 6.
9. A table addressing the impacts of the Preferred Alternative is located in **Chapter 4**.



ER 98/753

# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240



JAN 15 1999

Mr. James J. Steele  
Division Administrator  
Region 5, Michigan Division  
Federal Highway Administration  
315 West Allegan Street, Room 207  
Lansing, Michigan 48933

Dear Mr. Steele:

This is in response to the request for Department of the Interior's comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the Proposed Reconstruction of US-31 from I-196 in Allegan County north to I-96 in Muskegon County, Michigan.

## SECTION 4(f) EVALUATION COMMENTS

The area of potential effect (APE) for the proposed project includes many park and recreation areas, historic properties, archeological resources, and recreational trails. The APE also includes several proposed park and recreation areas. The DEIS describes 11 action alternatives, all of which could adversely affect some of these properties.

At this time, we are unable to concur with the first proviso of Section 4(f) because we believe, as explained below, that the DEIS does not adequately analyze low impact alternatives. Such low impact alternatives may achieve project objectives without adversely affecting Section 4(f) properties or other important resources.

The draft Section 4(f) Evaluation states that there are no Land and Water Conservation Act (LWCF) Section 6(f) properties within the study area. This is incorrect. The Matt Urban Sports Complex, also known as the Holland Softball Center, was acquired with assistance from LWCF under project 26-01023M1. If any property within the boundary of the Matt Urban Sports Complex will be used for the proposed improvements to US-31, the Federal Highway Administration should consult with the official who administers the LWCF program in Michigan to determine potential conflicts with Section 6(f) of the LWCF Act (Public Law 88-578, as amended). Section 6(f) of the LWCF Act states, "No property acquired or developed with assistance under this section shall, without the approval of the Secretary (of the Interior), be converted to other than public outdoor recreation uses." The administrator is: Mr. K.L. Cool, Director, Michigan Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909.

If further analysis of alternatives still indicates unavoidable adverse impacts to Section 4(f) properties, the Final Section 4(f) Evaluation should include specific measures to minimize harm to those properties. It should also show evidence of consultation and coordination with agencies that manage the properties, and illustrate that the agencies concur with any suggested mitigation. Copies of signed, documented agreements should be included in the Final Section 4(f) Evaluation.

1

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## ENVIRONMENTAL STATEMENT COMMENTS

### General Comments

The DEIS lacks a comparison of wetland functions and values among the build alternatives, making selection of an alternative relative to the amount *and* quality of wetland to be destroyed difficult. The DEIS also lacks an acceptable suite of alternatives that minimizes wetland habitat impacts yet fulfills project objectives. Therefore, the U.S. Fish and Wildlife Service (FWS) advises that it cannot concur with the second concurrence point, that of the acceptability of alternatives carried forward, pursuant to the NEPA/404 Merging Process. In addition, the DEIS is deficient in not including a requested comprehensive wetland habitat mitigation plan, in sufficient detail, describing how the significant and substantial adverse wetland impacts associated with freeway and new alignment alternatives would be offset. We recommend that a supplement to the DEIS be prepared that addresses these concerns.

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### Specific Comments

#### Project Description

The DEIS states that the purpose and need for the proposed project is to reduce traffic congestion and improve safety for the traveling public between Holland and Grand Haven. The DEIS reports that accident rates in the area are more than double the statewide average on comparable facilities. Five alternatives are presented in the DEIS:

- No-Action Alternative (rehabilitation of existing facilities without additional capacity)
- Low Capital Improvement Alternatives (2 Sub-alternatives)
- Limited-Access Freeway Alternatives (5 Sub-alternatives)
- Controlled-Access Boulevard Alternatives (2 Sub-alternatives)
- Uncontrolled-Access Boulevard Alternative (Upgrade of existing US-31 alignment)

The DEIS reports the no-build alternatives, i.e., No Action And Low Capitol Improvement alternatives (three total), would not impact wetland habitats but would also not increase traffic capacity. All other build alternatives (eight total) would impact wetlands, ranging from 19.25 hectares (47.55 acres) to 36.42 hectares (89.96 acres).

#### Impacts of Proposed Build Alternatives

Any freeway or new alignment alternative would have substantial impacts on wetlands, uplands and other fish and wildlife habitat. Broad-leaved deciduous hardwood forest, emergent, and scrub-shrub wetland habitat types have been identified within the project area. These wetlands provide various fish and wildlife species food, water, cover from predators, and shelter during severe weather. These wetlands also filter debris, pollutants, and sediments from surface water runoff and floodwaters. We believe that low capital improvement alternatives, in conjunction with lower impact build alternatives, need to be more thoroughly analyzed in an

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effort to avoid or minimize impacts to the aforementioned fish and wildlife habitats. More investigation, discussion, analysis, and creativity are needed to develop low impact alternatives, which may include, but not be limited to, traffic-calming strategies, road widening at key congestion areas, methods of rerouting through-traffic coupled with low impact city bypasses, etc.

#### Wetland Impact Comparisons

The DEIS adequately compares potential primary and secondary wetland impacts among the different build alternatives. Also, mitigation objectives for the different watersheds in which build alternatives would occur were well executed. However, the DEIS lacks any comparisons of wetland functions and values among the build alternatives, making selection of an alternative relative to the amount *and* quality of wetlands to be destroyed difficult.

5

#### Wetland Habitat Mitigation

The DEIS provides an adequate description of the general mitigation design goals and target wetland functions. Wetland mitigation impacts, replacement ratios, and mitigation acreage required by watershed, exact locations of habitat mitigation sites, and estimated costs were included. The DEIS also describes the advantages of wetland restoration over creation of new wetlands. If wetlands must be destroyed for this or any action, we support wetland restoration as a priority in selection criteria for wetland mitigation sites. Converted wetlands usually retain suitable hydric soils and "seed banks" that help increase the likelihood of wetland mitigation success upon the reestablishment of wetland water regimes.

However, the document is deficient in that a comprehensive wetlands habitat mitigation plan is absent. The October 27, 1994, letter from the FWS's East Lansing Field Office recommended that a comprehensive wetlands habitat mitigation plan that fulfills FWS mitigation goals should be developed early in the planning process and provided for advance agency review and inclusion into the DEIS. As previously recommended, the mitigation plan should include, but not be limited to:

6

- Site plans, or commitments, that include a perimeter buffer of at least 30 meters (100 feet) adjacent to all habitat mitigation sites.
- A commitment that wetland mitigation actions be initiated in advance of project construction so that wetland habitats may be functioning concurrent with the action's adverse wetland impacts.
- A commitment for post-construction monitoring of mitigation wetland habitats following their construction for a period of at least 6 years for emergent and shrub-scrub wetlands, and 10 years for forested wetlands.
- A timetable for habitat mitigation monitoring describing the time of year and the frequency of sampling.
- Performance criteria to measure habitat mitigation success.
- A commitment to steps that would be taken to correct or improve the biological productivity of the proposed wetland mitigation habitats in the event that performance criteria are not met. This would include planting desirable hydrophytic vegetation, controlling exotic and invasive plant species, and implementing other measures, as necessary, to achieve successful mitigation, for the duration of the monitoring period.

- The sponsor's commitment to submit annual monitoring reports to the Michigan Department of Natural Resources and the FWS.
- The sponsor's commitment to the establishment of a protection and management plan in perpetuity for the wetland habitat mitigation areas. This would include legal surveys of the specific boundaries, protective buffers, and appropriate conservation easements.

6

#### NEPA/404 MERGING COMMENTS

In a November 9, 1998, letter transmitting a copy of the DEIS to the FWS East Lansing Field Office, the Michigan Division of the Federal Highway Administration requested the FWS concurrence regarding the second concurrence point, "acceptability of alternatives carried forward," of the March 1994 NEPA/Section 404 Merging Process. In light of the potential substantial and significant impacts on valuable wetlands and other fish and wildlife habitat, the FWS remains unconvinced that the alternatives presented, in their current form, avoid and minimize environmental impacts to the extent practicable. Therefore, the FWS is currently unable to concur. The FWS will reconsider this concurrence point when alternatives are created or modified that would substantially reduce current projected wetland impacts.

7

#### ENDANGERED SPECIES ACT COMMENTS

The FWS has determined that there are presently no records of federally listed threatened, endangered, proposed, or candidate species in the project area. However, the absence of records for any federally listed species does not rule out the presence of such species. If the project is modified or new information about the project becomes available that indicates listed or proposed species may be present and/or affected, consultation with the FWS should be reinitiated.

8

If any species in the project area or affected by the project is federally listed or proposed during the action, the Federal Highway Administration should initiate consultation with the FWS to fulfill its responsibilities under the Endangered Species Act (ESA). Since threatened and endangered species data is continually updated, the FWS suggests you request an updated Federal list of the species occurring in the project area every six months during the remaining planning and building period pursuant to section 7(c) of the ESA (CFR § 402.12(c)). In summary, the proposed freeway and new alignment alternatives addressed in the subject DEIS would have considerable, unacceptable environmental impacts on wetlands, uplands, and other fish and wildlife habitats. The DEIS lacks a thorough analysis of low impact, low capital improvement possibilities that would address level of service, traffic congestion, and accident rates. Therefore, the FWS is unable to concur with the second concurrence point of the NEPA/404 Merging Process. In addition, the DEIS lacks a comprehensive wetlands habitat mitigation plan, with commitments, that had been requested by the FWS early in the planning process. Finally, the DEIS lacks any comparisons of wetland functions and values among build alternatives, making selection of an alternative relative to the amount and quality of wetland to be destroyed difficult. A supplement to the DEIS or the Final EIS should address these concerns.

9

The Department has a continuing interest in working with the Federal Highway Administration and the Michigan Department of Transportation to ensure that impacts to fish and wildlife resources are adequately addressed. For continued coordination on fish and wildlife issues, please contact the Field Supervisor, U.S. Fish & Wildlife Service, 2651 Coolidge Road, East Lansing, Michigan 48823-6316. The telephone number is: 517 351-2555.

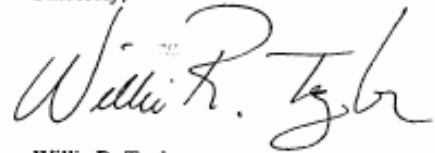
**SUMMARY COMMENTS**

At this time, we are unable to concur with the first proviso of Section 4(f) because the DEIS does not adequately analyze low impact alternatives, that could avoid adverse impacts to Section 4(f) properties. We will provide you with further comments on the proposed project upon the receipt of a supplement to the DEIS/Section 4(f) Evaluation or the Final EIS when circulated for public review and comment.

10

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Willie R. Taylor". The signature is fluid and cursive, with the first name "Willie" and last name "Taylor" clearly distinguishable.

Willie R. Taylor  
Director, Office of Environmental  
Policy and Compliance

cc: Mr. Jeff Saxby, P.E.  
Design Division  
Michigan Department of Transportation  
425 West Ottawa Street  
Lansing, Michigan 48933

**United States Department of Interior, Office of the Secretary, January 15, 1999**

1. The Preferred Alternative no longer impacts the Matt Urban Sports Complex Park in Holland or Harbor Island in Grand Haven.
2. The Preferred Alternative no longer affects Section 4(f) properties.
3. The comparison of wetland function and values in the DEIS found the derived function and value index to be similar among the build alternatives. Thus, the Watershed Wetland Impact Value was directly related to the amount of proposed wetland impacts for each alternative. Wetlands will be replaced in-kind and within the same watershed as the impacts. The maximum required acreage of wetland mitigation was calculated for each watershed using MDEQ regulatory replacement ratios. Ratios for areas of exceptionally high quality or low quality may be adjusted on an individual basis upon review by the resource agencies during permitting.

Lengthening the spans at river crossings and avoiding high quality wetlands has substantially reduced the amount of wetlands impacted by the Preferred Alternative. A supplement to the DEIS is not warranted as the wetlands discussions in the FEIS has addressed concerns received on the DEIS.

4. Low capital improvement alternatives were examined in more detail since the DEIS. They failed to meet the Purpose of and Need for the project and were eliminated from further consideration. In addition, lengthening the spans at river crossings and avoiding high quality wetlands has substantially reduced the amount of wetlands impacted by the Preferred Alternative.
5. The amount of wetlands impacted by the Preferred Alternative has been substantially reduced since publication of the DEIS (2.55 acres as compared to 89.96 acres). Discussion of wetland function and values can be found in the FEIS. A function and value assessment using the MnRAM method was conducted to provide a basis for determining the quality of the wetlands that will be affected by the Preferred Alternative. The function and value assessment also provides data for determining the wetland mitigation goals and targeted functions that will need to be designed into the mitigation areas to compensate for unavoidable wetland impacts.
6. A comprehensive wetlands habitat mitigation plan will need to be developed. The mitigation plan will include, but is not limited to the recommendations made by the USFWS.
7. See response to comment five. Since this comment letter was issued, MDOT conducted several meetings with the USFWS to discuss this issue. The revisions made to the current Preferred Alternative, and the conceptual designs of the wetland mitigation plans reviewed during the December 6, 2001 Resource Agency meeting update, were given tentative approval by USFWS personnel at that time.
8. According to correspondence with the Michigan Department of Natural Resources (MDNR) and the US Fish and Wildlife Service (USFWS), the following species are known to occur near the Preferred Alternative: Pitcher's thistle (*Cirsium pitcher*), American ginseng (*Panax quinquefolius*), Great Lakes marsh, Indiana bat (*Myotis sodalist*), and the recently de-listed bald eagle (*Haliaeetus leucocephalus*). The eastern box turtle (*Terrapene carolina carolina*), a state species of special concern, was found within the project area although it was not mentioned in correspondence with the MDNR.
9. Comment acknowledged. The threatened and endangered species data was reviewed periodically in order to ensure that the assumptions presented in the FEIS are still accurate. The most recent request for an update to lists used for this study was made in the summer of 2007. We received a letter from the MDNR on July 26, 2007 listing threatened or special concerned species in the study area. On August 3, 2007, the USFWS website was checked for threatened or special concern species within the study area.

10. Comment acknowledged. During the FEIS process MDOT evaluated Section 4(f) impacts in detail, and the Preferred Alternative no longer has any Section 4(f) impacts, by modifying the design and moving the alignment.

## Advisory Council On Historic Preservation

The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

Jan 21 1999

James A. Kirschensteiner  
Federal Highway Administration  
315 West Allegan, Room 207  
Lansing, Michigan 48933

REF: Draft Environmental Impact Statement  
Improvements to US-31 from I-96 in Allegan County North to Muskegon County  
Michigan

Dear Mr. Kirschensteiner:

We want to thank the Federal Highway Administration (FHWA) for providing the Council with an opportunity to review the Draft Environmental Impact Statement (EIS)/Section 4(f) Evaluation for the referenced undertaking. We have reviewed the draft EIS and have prepared comments for your consideration. However, we ask that you indicate to us if FHWA's request for the Council's review of the draft EIS for the referenced undertaking is intended as a notification of adverse effect and an invitation for the Council to participate in consultation.

We offer the following comments and recommendations based on our review of the draft EIS:

- As currently written, the *Summary* section in the draft EIS suggests that FHWA may seek Council comment on separate determinations of no adverse and adverse effect. This section should be revised because the Council provides a single comprehensive comment when an undertaking will affect historic properties, not a separate comment on each effect. Furthermore, when a Federal agency determines that the undertaking will have an adverse effect on historic properties that determination becomes the statement of effect for the entire undertaking. 1
- Once FHWA and the Michigan State Historic Preservation Office (SHPO) agree that the proposed action will adversely effect historic properties, FHWA should notify the Council of this determination and invite our participation in consultation, in accordance with 36 CFR § 800.5(e). If we elect to participate in consultation, FHWA should provide the Council with sufficient project documentation so that we may participate fully. In this case, the Council would be a full signatory to any Agreement document developed through consultation. On the other hand, the Council may elect not to participate in 2

consultation whereupon the Agreement would be submitted for Council acceptance. Summaries of the process described by the Council's regulations, "Protection of Historic Properties" (36 CFR Part 800), which are found in the *Summary, Cultural Resources* (5.8) and *Mitigation* (6.8) sections of the draft EIS should be revised to more accurately reflect the Section 106 process.

- Since these same sections [*Summary, Cultural Resources* (5.8) and *Mitigation* (6.8)] appear to be intended to provide an overview of the Section 106 process, they must also make it clear that FHWA should afford interested persons with an opportunity to participate in consultation regarding how to avoid, minimize or mitigate adverse effects to historic properties, if they so request. In accordance with the Council's regulations, FHWA is also responsible for identifying such interested persons. The connection between public concerns, potential effects to historic properties and selection of an alternative is clearly stated in the succinct and informative *Areas of Controversy* section. However, the draft EIS should make it clear that identification and consideration of the concerns of interested persons is furthered through Section 106 consultation.
- The *Summary* and *Cultural Resources* sections of the draft EIS state that the Michigan Department of Transportation (MDOT) has evaluated effects pursuant to 36 CFR § 800.9. This statement must be revised because under the Council's regulations it is only the Federal agency, in this case FHWA, which has responsibility for making a determination of the effect.
- We note that the undertaking's Area of Potential Effect (APE) is described in Section 4.8.2. However, the discussion in the *Summary* section would also be significantly enhanced by inclusion of a map or verbal description of the APE. The draft EIS should also explain the basis on which the APE has been defined. In this way, any questions regarding its adequacy may be more precisely addressed.
- Section 4.8.3 should indicate when additional studies to determine the eligibility of certain archeological sites will be conducted.
- In Section 5.8.3 and again in 6.8.2, you state that eligible archeological sites may be adversely affected by implementation of the project. However, the discussion in these sections, erroneously connects significance under Criterion D with the "Exception to the Criteria of Adverse Effect" in 36 CFR § 800.9(c). If an archeological site is eligible under Criterion D, it does not necessarily follow that the Exception to the Criteria of Adverse Effect apply. The exception is applicable when a site is of value only for its potential contribution to research. Note here that the emphasis of the exception is on the site's limited "value" not "significance." An archeological site significant under Criterion D may be of value for research, but may also possess other very important values. For example, we would not recommend applying the exception to an archeological site containing human remains. Therefore, when considering the applicability of the exception you should evaluate and consider all of the values of the site. Likewise, a site could be eligible under another criterion but be of value only for the information it contains.
- In Section 5.8, you have determined that the proposed alternatives will affect the setting of the Boer Farm, a property considered eligible for listing in the National Register of

3

Historic Places. However, FHWA has determined that this affect will not be adverse. We recommend that you reconsider whether this affect will introduce "*visual, audible or atmospheric elements that are out of character with the property or alter its setting*" in accordance with 36 CFR § 800.9(b)(3). Although omitted from consideration here, we note that this criterion was a major factor in determining effects on other properties, ie. the Ottawa School.

We hope that you will find this review helpful. Should you require additional clarification or assistance do not hesitate to contact me at (202) 606-8527. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Laura Henley Dean".

Laura Henley Dean, Ph.D.  
Historic Preservation Specialist  
Office of Planning and Review

**Advisory Council on Historic Preservation, January 21, 1999**

1. Comment acknowledged. The Preferred Alternative does not impact any historic properties.
2. Comment acknowledged. The language in **Section 5.8.1** has been modified to accommodate the Advisory Council's request to revise the language concerning any proposed action and the process in which the Advisory Council may become involved.
3. Comment acknowledged. Agreement between FHWA, Michigan's State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation has been reached through procedures pursuant to Section 106 of the National Historic Preservation Act.
4. The language has been revised in **Section 5.8**.
5. The Area of Potential Effect (APE) is verbally defined in **Section 4.8.2** and has been added to **Figures 5.8-1 through 5.8-3**.
6. With the exception of several outstanding parcels along 120th Avenue, north of the Grand River, all of the additional studies to determine the eligibility of archaeological have been performed. Based on the available information, no significant archaeological findings are noted or anticipated on the remaining eleven parcels. FHWA and SHPO agreed that the EIS process could proceed without access. When the property is purchased, the required analyses will be completed on the remaining eleven parcels.
7. The affected sites were determined to be eligible only under Criterion A and C, not D, which is discussed in Section 4.8.1 of the DEIS.
8. The Preferred Alternative does not affect the Boer Farm.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control  
and Prevention (CDC)  
Atlanta GA 30341-3724

January 8, 1999

Mr. Jose A. Lopez, Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Lopez:

We have completed our review of the Draft Environmental Impact Statement (DEIS) for US-31 from I-196 in Allegan County North to I-96 in Muskegon County. We are responding on behalf of the U.S. Public Health Service, Department of Health and Human Services.

Generally, we believe this DEIS addresses our potential concerns. However, our review did not reveal a specified "Preferred Alternative." Although not specifically required by NEPA, we recommend that future DEISs state a preferred alternative based on the best available information and current thinking of the sponsors so reviewers may compare alternatives to it. Based on comments received, modifications may be made or a different preferred alternative may evolve and be presented in the Final document for review.

1

Thank you for the opportunity to review and comment on this DEIS. Please send us a copy of the Final DEIS, and any future environmental impact statements which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely,

Kenneth W. Holt, MSEH  
Special Programs Group (F16)  
National Center for Environmental Health

**Michigan Department of Health and Human Services, January 8, 1999**

1. Comment acknowledged. The FEIS describes the Preferred Alternative in detail.

**NATURAL RESOURCES  
COMMISSION**  
JERRY C. BARTNIK  
LARRY DEWYST  
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JAMES P. HILL  
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STATE OF MICHIGAN



JOHN ENGLER, Governor

**DEPARTMENT OF NATURAL RESOURCES**

Stevens T. Mason Building, P.O. Box 30008, Lansing, MI 48909  
ROLAND HARMES, Director

November 29, 1994

Mr. Ronald Kinney  
Environmental Section  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Kinney:

This is in response to your September 19, 1994 request for comments on the Scoping Document for the proposed US-31 location design study extending from Holland to Grand Haven in Ottawa, Allegan and Muskegon counties.

Based on our review of materials submitted to this office as well as extensive field review of the project area, the MDNR does concur with the purpose and need for this project. This determination is made in accordance with the recently signed Memorandum of Understanding between the Michigan Department of Transportation and the Michigan Department of Natural Resources as well as agreements on merging the National Environmental Protection Agency and Section 404 regulatory process for transportation projects.

1

Permits from the MDNR will be required for this project under the provisions of the Inland Lakes and Streams Act, (1972 PA 346 as amended), the Goemaere-Anderson Wetland Protection Act, (1979 PA 203 as amended), and the State's Floodplain Regulatory Authority, (1929 PA 245 as amended by 1968 PA 167). Other permit requirements may be identified at a later date as the project's total impacts are more adequately addressed.

2

Please ensure that the environmental document adequately addresses the statutory provisions of these Acts which requires a demonstration that the project is in the public interest, is necessary and will not cause an unacceptable disruption to the aquatic resources.

3

Environmental documents and/or plans submitted for our review should include, or have as an attachment, a base map or aerial plan view of the project area showing the alternates, the preferred route, wetland locations, types of wetlands involved, their resource values, total wetland acreage, number of acres being impacted, proposed available mitigation sites, mitigation methods, location of endangered and threatened species,



R 1026  
W92



Mr. Ronald Kinney  
November 29, 1994  
Page 2

hazardous waste sites, floodplains, watercourses, waterbodies and their proposed crossing methods and areas of special interest or unique character. Submission of the above information will allow the MDNR to conduct a comprehensive review and submit more detailed comments to your office within a reasonable time frame.

4

The Department of Natural Resources has determined that the wetland habitats involved with all but the existing alignment are of a extremely high value. Every effort must be made to eliminate or minimize to the extent possible, loss of these valuable resources since mitigation for these types of wetland values are very difficult and extremely costly. As a minimum the mitigation ratios for emergent scrub-shrub type wetlands is 1.5 to 1 with a mitigation ratio of 2 to 1 for loss of forested wetland habitat.

5

Proposed alterations to the involved watercourses which have a contributing drainage area of greater than two square miles, will require sufficient hydraulic computations to determine that any proposed alteration or placement of structures will not cause a harmful interference to flood flows. Although the hydraulic computations need not be part of the environmental document, it is recommended that they be conducted in the early stages of design to minimize any unnecessary delays during the processing of your permit application. The analysis should include computations for a range of discharges up to and including the 100-year urbanized (if applicable) discharge. A design discharge may be requested from this office to assist you in conducting your hydraulic review. Please direct such requests to Mr. David Hamilton, Hydrologic Studies Unit, Land and Water Management Division, MDNR, P.O. Box 30028, Lansing, MI 48909.

6

Prior to permit application and early in the design stage, a preliminary meeting should be held between our agencies to lay the ground work necessary to effect a feasible and acceptable mitigation proposal. This exchange of ideas will minimize costly delays which could occur during permit processing.

7

We encourage you to devote a substantial effort in the environmental document to the project's secondary impacts associated with accelerated and expanded development that may result from its approval. Induced growth can eliminate forested areas used for wildlife habitat and will put pressure on remaining areas. Lakes, streams and wetlands that currently give the region its unique and attractive character will also be particularly vulnerable to developmental impacts as a result of filling, dredging, increased recreational use, increased runoff volumes and pollutants, and lost flood retention and filtration capacity. The proximity of noise, light and human activity will discourage wildlife uses in the remaining areas.

8

Mr. Ronald Kinney  
November 29, 1994  
Page 3

The environmental assessment should address impacts to surface water quality, which may result from in-stream bridge and culvert activities, proposed increase in discharge rates to the receiving watercourse, increased stream velocities, and potential water quality impacts associated with roadway runoff.

9

The following comments were received from the Michigan Natural Features Inventory(M.N.F.I.):

**Plants** - p 36 - *Lithospermum latifolium* - The habitat listed for this species should also include Southern Floodplain Forest. Walk through surveys may or may not have been adequate to discover rare species. No conclusions about the probability of occurrence of rare plants within the corridors can be drawn from this report.

10

**Survey methodology** - The survey methodology is not adequately explained to determine whether or not any of the surveys were adequate to draw conclusions about species presence or absence. Report should include maps with survey routes noted, amount of time spent on each route, time of day, weather conditions and details of method.

11

**Animals** - "Pedestrian" and canoe surveys are not adequate for determining presence/absence of certain listed species. In particular, king rail, Kirtland's snake, fish, and Blanchard's cricket frog require special techniques or timing. Based on the habitat described as present, we feel there is a high potential for rare animal occurrences.

12

**King rail** surveys require use of taped calls and must be accomplished in a fairly narrow time window. You would not expect to find this secretive species in July, or at any time without using taped calls. Additionally, the methods description indicates that little survey work was done in the appropriate habitat for this species.

**Kirtland's snake** is notoriously difficult to detect. The report notes that there is little appropriate habitat, but this small species does not necessarily require large habitat patches. It is unclear from the methods description whether or not the appropriate habitat was visited.

**Blanchard's cricket frog** - To detect this species, night surveys during the mating season are required. The species would not likely be found by walking through its habitat in daylight.

**Fish** - Neither pedestrian nor canoe surveys would be expected to detect rare fish species. Seining or other capture techniques are necessary to detect fish.

Mr. Ronald Kinney  
November 29, 1994  
Page 4

The black rat snake is listed on p. 32 as a common species. This species is rare in Michigan and is considered of Special Concern by MNFI. Several points in the report refer to information obtained from "MNAI," which at one point is identified as "Michigan Natural Areas Inventory." I am aware of no such organization in the state. Did the report mean to refer to MNFI (Michigan Natural Features Inventory)?


13

It is the opinion of the MNFI biologist that more comprehensive detailed surveys would likely discover occurrences of endangered, threatened or special concern species within these corridors. MNFI recommends that this report be followed up by more comprehensive surveys of appropriate habitats along the corridors.

14

If you have any questions or if I may be of further assistance please feel free to contact me at 517-373-1170.

Sincerely,



David A. Bastian, Supervisor  
Transportation Review Unit  
Land and Water Management Division

DAB:sas

cc: T. Weise, WMD  
K. Eustice, LWMD  
Peg Bostwick, LWMD  
Dist. 9, LWMD  
Dist. 12, LWMD

**Michigan Department of Natural Resources (MDNR), November 29, 1994**

Comments from the MDNR were received in both 1994 and 1999. The 1994 comments were incorporated into modifications of alternatives developed for the DEIS. Responses to the 1994 comments are listed below. The 1999 comments are addressed later in this chapter.

1. Concurrence on “Purpose and Need” acknowledged.
2. Permit requirements, including those noted, are discussed throughout in **Section 4.22**.
3. The Purpose of and Need for the project is documented in **Chapter 2**. This demonstrates that the project is necessary for the public interest. The description of impacts and mitigation of the impacts to aquatic resources are documented in detail in **Chapter 4**. Significant efforts were made between the DEIS and FEIS to avoid and/or minimize impacts to aquatic resources by adjusting the alignment of the Preferred Alternative.
4. This information is included in the FEIS. The base map showing the DEIS Practical Alternatives is **Figure 3.1-1**. A base map and aerial of the Preferred Alternative is included in **Figure 3.5-1** and **Appendix A**, respectively. Mapping of wetland mitigation sites, floodplains, watercourses, waterbodies, and proposed crossings of these waterbodies and watercourses can be found in **Chapter 4** of the FEIS. Hazardous waste sites are discussed in **Section 4.6.1**, but not mapped. Threatened and endangered species were not observed within the study area and therefore there is no mapping of these resources.
5. Avoidance, minimization, and replacement values of wetlands were completed as required, and documented in **Section 4.9**. Specifically, the number of forested wetlands has been reduced to 0.984 acres, as compared to 60.31 acres identified in the DEIS.
6. An hydraulic analysis of the Grand River crossing was completed for the Preferred Alternative. No adverse impacts to hydraulics or floodplains of the rivers will be caused by the proposed structures. The proposed Grand River crossing structures span the floodplains.

The hydraulic analyses were performed in the vicinity of the proposed bridge crossing. A cross-section field survey was performed at the following locations:

- Along the crown of the roadway centerline.
- At the upstream and downstream faces of the proposed structure.
- One bridge length upstream of the face of the structure.
- Five downstream of the structure at 100-foot intervals, beginning 150 feet downstream of the proposed roadway centerline.
- Five upstream of the structure at 100-foot intervals, beginning 150 feet downstream of the proposed roadway centerline.

The hydraulic computations determined that there would be no harmful interferences to flood flows.

7. Request for a meeting prior to permit application(s) is acknowledged. Nine resource agency meetings have been held throughout the study to date. The MDEQ attended and participated in all the meetings. Early coordination will be pursued prior to construction.

8. MDOT retained the services of Michigan State University's (MSU) Basic Science and Remote Sensing Department to create a Land Use model for the study area and adjoining counties. The results of this study are detailed in **Section 2.2** of the FEIS or at [www.us31.msu.edu](http://www.us31.msu.edu).
9. Surface water quality topics are included in **Section 4.10** of the FEIS.
10. A meeting was held on February 3, 1995 with MDOT, MDNR and consultant representatives to discuss this particular comment letter. MDOT prepared a report titled "Task 7.91 Natural Environmental Biological Assessment (Supplemental: Protected Species Sampling), February 1995. This report provides a more in-depth description of the methods used in the review of the corridors for protected species. Specific mention is made regarding the Southern Floodplain Forest in this 1995 supplemental report to address this comment.
11. A meeting was held on February 3, 1995 with MDOT, MDNR and consultant representatives to discuss this particular comment letter. MDOT prepared a report titled "Task 7.91 Natural Environmental Biological Assessment (Supplemental: Protected Species Sampling), February 1995. This report provides a more in-depth description of the survey methods used in the review of the corridors for protected species. Each element of this comment was addressed in this 1995 supplemental report.
12. A meeting was held on February 3, 1995 with MDOT, MDNR and consultant representatives to discuss this particular comment letter. MDOT prepared a report titled "Task 7.91 Natural Environmental Biological Assessment (Supplemental: Protected Species Sampling), February 1995. This report provides a more in-depth description of the survey methods used in the review of the corridors for protected species. An additional a meeting was held on May 15, 1996 with MDOT, MDNR and consultant representatives to discuss additional Threatened & Endangered Species surveys that were scheduled for the summer and fall of 1996. Specific surveys were conducted in 1996 for the King Rail, Kirkland's Snake, and Blanchard's Cricket Frog as per the preferred methodologies. Because of the potential impacts to threatened or endangered fish species it was recommended by the MDNR that fish sampling not be conducted, therefore, no sampling was performed.
13. Comment acknowledged. MNAI has been corrected to MNFI.
14. A meeting was held on February 3, 1995 with MDOT, MDNR and consultant representatives to discuss this particular comment letter. MDOT prepared a report titled "Task 7.91 Natural Environmental Biological Assessment (Supplemental Protected Species Sampling), February 1995. This report provides a more in-depth description of the survey methods used in the review of the corridors for protected species. New surveys were conducted in areas where the Preferred Alternative alignment was altered.



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

July 26, 2007

Mr. Brandon Earl  
URS Corporation  
3950 Sparks Drive, SE  
Grand Rapids, MI 49546

**RE: Proposed redesign/enlargement of two existing segments of US-31**

Dear Mr. Earl:

The location of the proposed project was checked against known localities for rare species and unique natural features, which are recorded in a statewide database. This continuously updated database is a comprehensive source of information on Michigan's endangered, threatened and special concern species, exemplary natural communities and other unique natural features. Records in the database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records may mean that a site has not been surveyed. The only way to obtain a definitive statement on the presence of rare species is to have a competent biologist perform a field survey.

Under Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection, "a person shall not take, possess, transport, ...fish, plants, and wildlife indigenous to the state and determined to be endangered or threatened," unless first receiving an Endangered Species Permit from the Department of Natural Resources, Wildlife Division. *Responsibility to protect endangered and threatened species is not limited to the list below. Other species may be present that have not been recorded in the database.*

The presence of threatened or endangered species does not preclude activities or development, but may require alterations in the project plan. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered in the future.

The following is a summary of the results for the project in Ottawa County, sections 14, 15, 16, 21, 22, 23, 28, 33, T8N R15W; sections 4, 9, 16, 21, T7N R15W; sections 20, 21, 28, T8N R16W.

The following list includes unique features that are known to occur on or near the site(s) and may be impacted by the project.

common name	status	scientific name
Pitcher's thistle*	state/federally threatened	<i>Cirsium pitcheri</i>
Ginseng	state threatened	<i>Panax quinquefolius</i>
Great Lakes marsh	N/A	N/A

Pitcher's thistle has been known to occur in section 20, T8N R16W and is known to be growing

NATURAL RESOURCES COMMISSION  
Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • Darnell Earley • John Madigan • J. R. Richardson • Frank Wheatlake  
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[www.michigan.gov/dnr](http://www.michigan.gov/dnr) • (517) 373-2329  
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extensively along the shoreline. Pitcher's thistle typically grows on open sand dunes and occasionally on lag gravel associated with dunes. All of its habitats are along the Great Lakes shores, or in very close proximity. Pitcher's thistle often occurs in association with the Great Lakes endemic Houghton's goldenrod (*Solidago houghtonii*) when interdunal wetlands are present.

This monocarpic (once-flowering) plant produces a vigorous rosette that may mature for 5-8 years or more before it flowers. Pitcher's thistle blooms from approximately late-June to early September. Seeds are dispersed individually by wind or as entire flower heads blown across the sand or possibly transported by water. Seeds germinate in June, and most seedlings appear within 1-3 meters of parent plants. The taproot of this thistle, which can reach 2 m in length, enhances its ability to survive the often desiccating conditions of its dune habitat.

Pitcher's thistle can be locally extirpated by destruction or major disturbance of its habitat (e.g. by shoreline development, vehicular or ORV traffic, heavy foot traffic and/or intensive recreation).

**Ginseng** has been found in section 20, T8N R16W. It also occurs in wooded dune hollows and leeward slopes along the Lake Michigan shoreline. Common associates include sugar maple, hickory, basswood, red maple and white ash, although not all are required to be present. Ginseng is a long-lived plant. Flowering may occur during the fourth year; however, often it is not until the fifth year or later that mature fruit is produced. Flowering occurs during June and July, with flowers developing small green fruits in late July and early August. In late August and September the fruits ripen, becoming bright crimson (red) in color.

A **Great Lakes Marsh** has been recorded in section 28, T8N R15W. Great Lakes marshes are characterized as being multi-seral, non-forested wetlands that are directly influenced by and connected to a large freshwater lake. The habitat is important for migrating and breeding waterfowl, shorebirds, spawning fish, and mammals. Vegetational patterns and dominance are influenced by the type of coastal feature, but generally include: a deep marsh with submerged plants (ex. wild-celery, waterweed, pondweed, water-milfoil); an emergent marsh of mostly narrow-leaved species (ex. cat-tails, bulrushes, arrowhead, bur-reed, wild-rice); a marsh meadow which is inundated by storms (dominated by sedges), and at the upland margin dogwood, willow, speckled alder, sweet gale, and sedges. Seiches, storms and water level cycles change vegetation over short periods by destroying some vegetation zones, creating others, and forcing all zones to shift lakeward or landward to accommodate water levels.

In summary, the project site may include suitable habitat for the above listed species. Potential impacts might include direct destruction of species and disturbance of critical habitat. **Clearance from this office in the form of a "No Effect" statement will be needed before work on this project begins.** To obtain an evaluation for project clearance, please provide at least one of the following to this office:

1. Description of the project area with regard to the species habitat type(s) described above. A recent photo of the project site and a map that shows habitat type(s) and location(s) of the proposed project will be necessary. This can be done by the landowner, other responsible party, or knowledgeable source (i.e. botanist, ecologist, biologist, experienced birder, etc.). This level of evaluation will only define the presence or absence of available habitat. If this office determines that there is no significant available habitat, the project may be cleared at this point. If potential habitat does exist, the next level of evaluation must be undertaken (see options 2 or 3 below).

**OR**

Brandon Earl  
URS Corporation

Page 3  
07/26/2007

2. A statement from a knowledgeable source (see above) stating that suitable habitat is or is not present and why the project will not impact the species or habitat(s) identified above.

**OR**

3. Results from a complete and adequate survey by a knowledgeable source (see above) showing whether or not the above listed species are present in the affected project area. Guidelines for conducting surveys can be obtained from this office on request. For additional information and guidance for conducting surveys, including consultation with MNFI staff biologists, please contact me at the number below or go to the DNR website at [www.michigandnr.com/publications/pdfs/huntingwildlifehabitat/TE\\_consultants.pdf](http://www.michigandnr.com/publications/pdfs/huntingwildlifehabitat/TE_consultants.pdf).

In most situations, the most efficient, thorough, and expeditious evaluation of the project and its impacts results from option 3. Please provide information **in writing** to the mailing address or e-mail provided below.

Michigan Department of Natural Resources  
Wildlife Division – Natural Heritage Program  
PO Box 30180  
Lansing, MI 48909

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. If you have further questions, please call me at 517-373-1263 or e-mail at [SargenL2@michigan.gov](mailto:SargenL2@michigan.gov).

Sincerely,

  
Lori G. Sargent  
Endangered Species Specialist  
Wildlife Division

cc: Craig Czarniecki, US Fish & Wildlife Service

October 26, 2007

Ms. Lori Sargent  
Michigan Department of Natural Resources  
Wildlife Division  
P.O. Box 3044  
Lansing, MI 48909

**Re: Proposed Existing US-31 Improvements and Construction of New Alignment**  
**T8N, R15W, Sections 14, 15, 16, 21, 22, 23, 28, 33**  
**T7N, R15W, Sections 4, 9, 16, 21**  
**T8N, R16W, Sections 20, 21, 28, 29**  
**T5N, R15W, Sections 8, 9, 16, 17, 21**  
**Ottawa County, Michigan**

Dear Ms. Sargent:

As part of our compliance with Part 365, Endangered Species Protection of the Natural Resources and Environmental Protection Act (Act 451 of the Michigan Public Acts of 1994), an endangered species habitat assessment was performed in late August 2007 on behalf of the Michigan Department of Transportation (MDOT) by URS Corporation.

Our client is proposing to redesign and enlarge two segments of US-31 near Holland and Grand Haven. The Preferred Alternative keeps construction activities within the highway's current footprint by narrowing the median. MDOT is also proposing to construct a new alignment which connects Lake Michigan Drive (M-45) and I-96. Please see the enclosed maps for the preferred alignment. This project will reduce crashes and congestion that routinely occur on US-31.

According to correspondence with the Michigan Department of Natural Resources (MDNR), two threatened species and one special natural community are known to occur within the project area. The project area was examined by Sherry Slocum and Brendan Earl, Environmental Scientists for URS Corporation, for the presence of Pitcher's thistle, American ginseng, and Great Lakes marsh and their associated habitats.

The habitat along the two segments of existing US-31 in Grand Haven and Holland Township is almost entirely developed or landscaped. It consists of commercial buildings, landscaped lawns, and disturbed roadside habitat. Neither the Pitcher's thistle nor American ginseng was observed and are unlikely to inhabit this unnatural and routinely disturbed habitat. The only wet areas in the area were county-maintained drains.

Several different habitat types exist along the proposed new alignment in Robinson and Crockery Townships. The upland areas consist of mesic southern forests, grasslands/old

fields, nurseries, and agricultural land. The mesic southern forest habitat includes white oak (*Quercus alba*), red oak (*Quercus rubra*), red maple (*Acer rubrum*), American beech (*Fagus grandifolia*), sassafras (*Sassafras albidum*), black cherry (*Prunus serotina*), scotch pine (*Pinus sylvestris*) and stands of eastern white pine (*Pinus strobus*). The understory consists of bracken fern (*Pteridium aquilium*), ground pine (*Lycopodium sp.*), false Solomon's seal (*Smilacina racemosa*) and Virginia creeper (*Parthenocissus quinquefolia*). The old field habitat is dominated by Queen Anne's lace (*Daucus carota*), milkweed (*Asclepias spp.*), goldenrod (*Solidago sp.*), mullein (*Verbascum sp.*), chicory (*Cichorium intybus*) and sumac (*Rhus sp.*).

Wetland habitat was present within the project area, mainly around the banks of the Grand River and other smaller waterways. These wet areas support emergent, wet meadow and wet prairie habitat as well as forested habitat. The emergent wetland areas are dominated by reed canary grass (*Phalaris arundinacea*), arrow arum (*Peltandra virginica*) and cattail (*Typha spp.*). Some of the wetlands have a sapling fringe dominated by green ash (*Fraxinus pennsylvanica*) and assorted willow species (*Salix spp.*). The forested wetland areas contain eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*) and green ash. The project area also contains areas of wet prairie which support joe-pye-weed (*Eupatorium maculatum*), blue vervain (*Verbena hastata*), late goldenrod (*Solidago gigantea*) and swamp milkweed (*Asclepias incarnata*).

Pitcher's thistle (*Cirsium pitcheri*) grows extensively along shorelines on open sand dunes and low open beach ridges of the Great Lakes' shores. It is most often found in near-shore plant communities but can also grow in all non-forested areas of a dune system. This native thistle often occurs in association with the Great Lakes endemic Houghton's goldenrod (*Solidago houghtonii*).

American Ginseng (*Panax quinquefolius*) is found in rich hardwood forests often on slopes or ravines and sometimes in swampy areas and wooded dune hollows. Ginseng grows best in heavy soils (clay mixed with gravel) covered with leaf mold or rotted wood. Flowering occurs during June and July with the flowers developing into small green fruits in late July and early August. In late August and September the fruits ripen and become bright crimson in color.

A Great Lakes marsh, a multi-seral, non-forested wetland, is directly influenced by and connected to a large freshwater lake. They are important habitat for waterfowl, shorebirds, fish, and mammals. Vegetational pattern and dominance are influenced by the type of coastal features including deep marsh, emergent marsh, marsh meadow, and upland margin.

After a thorough examination of all habitats potentially impacted by the new alignment, this proposed project should have no significant impact on state listed species or their associated habitat. No Pitcher's thistle was observed during the site assessment and this species is unlikely to exist within the project area due to the lack of suitable open dune and shoreline habitat. Additionally, no Great Lakes marshes were observed on account

of the absence of large freshwater lakes in the project area. No American ginseng was found within the project area, however, small pockets of suitable habitat may exist in the upland forest areas. One small area of potential habitat was identified north of Lincoln Street, near the Beeline Drain. This Dry-Mesic Southern Forest habitat is situated on sloping terrain and contains a thick litter layer consisting of rotting leaves and wood.

Should you have any questions or if you need additional information, please contact Ms. Sherry Slocum at (616) 560-5245.

Sincerely,

**URS Corporation**

Sherry Slocum  
Environmental Scientist

Brendan M. Earl  
Environmental Scientist



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

January 15, 2008

Mr. Brandon Earl  
URS Corporation  
3950 Sparks Drive SE  
Grand Rapids, MI 49546

Dear Mr. Earl:

Information received dated November 13, 2007 (received November 19, 2007) regarding the impacts of the proposed improvements and addition to US-31 in Ottawa County (sections 14, 15, 16, 21, 22, 23, 28, 33, T8N R15W, sections 4, 9, 16, 21, T7N R15W, sections 20, 21, 28, T8N R16W) has been reviewed. The information was found

  X   to adequately address the concerns for potential threatened and endangered species at the site in question.

       not adequately address the concerns for potential threatened and endangered species at the site in question.

Based on the provided information,

  X   The proposed project should have no direct impacts on known special natural features at the location(s) specified if it proceeds according to the plans provided. Please contact me for an evaluation if the project plans are changed.

       The following special features occur on the site(s) and should be avoided and protected from harm from all activities associated with the project and in perpetuity from any future activities on the property.

NATURAL RESOURCES COMMISSION  
Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • Darnell Earley • John Madigan • J. R. Richardson • Frank Wheatlake

STEVENS T. MASON BUILDING • P.O. BOX 30028 • LANSING, MICHIGAN 48909-7528  
[www.michigan.gov/dnr](http://www.michigan.gov/dnr) • (517) 373-2329

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Brandon Earl  
URS Corporation

Page 2  
01/15/2008

  X   An endangered species permit is required if activities will harm the species that are present, including transplanting them to another location.

       The project may proceed with recommendations listed below. You are advised to minimize or eliminate impacts on endangered and threatened species and to report observations to this office.

       Other recommendations:

Thank you for your cooperation in addressing the protection of Michigan's Natural Resource Heritage. If you have further questions I can be reached at 517-373-9418.

Sincerely,



Lori G. Sargent  
Endangered Species Specialist  
Wildlife Division  
[SargentL2@michigan.gov](mailto:SargentL2@michigan.gov)

cc: Craig Czamecki, US Fish & Wildlife Service

STATE OF MICHIGAN



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*"Better Service for a Better Environment"*

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48999-7973

INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)

RUSSELL J. HARDING, Director

REPLY TO:

LAND & WATER MANAGEMENT DIVISION  
PO BOX 30458  
LANSING MI 48999-7558

January 11, 1999

Mr. Ron Kinney, Manager  
Environmental Section  
Project Planning Division  
Michigan Department of Transportation  
PO Box 30050  
Lansing, Michigan 48909

Dear Mr. Kinney:

SUBJECT: US-31 Draft Environmental Impact Statement (DEIS)

Thank you for the opportunity to review the DEIS for the proposed US-31 connection between Holland and Grand Haven. On August 18, 1998 we provided comments to Carolyn Nelson of MDOT on a preliminary draft of the EIS. Some of those suggestions were not made to the revised draft and are listed below with any new comments. Please review and incorporate these comments into the final EIS as applicable.

We concur with the alternatives indicated in the DEIS as those alternatives which should be carried forward. It should be noted that our previous objections to alternatives F and F/J1 still stand. The proposed project in the vicinity of the Pigeon River would result in severe adverse impacts to the floodplain and wetland areas. It is our recommendation that this area be avoided as other feasible and prudent alternatives exist.

1

Other comments to the document are as follows:

Section 1.7 - Permits:

-In paragraph 1, page 1-13, the following wording should be used:

A permit from the Michigan Department of Environmental Quality (MDEQ) may will be required to occupy, fill, or grade lands in a floodplain, streambed, or channel of a stream under the State's Floodplain Regulatory Authority found in Part 31, Water Resource Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

2

Mr. Ron Kinney

2

January 11, 1999

A permit from the MDEQ may be required under Part 301, Inland Lakes and Streams of NREPA for any of the following activities:

2

- a) Dredge or fill bottomland of a lake or stream.
- b) Construct, enlarge, extend, remove, or place a structure on bottomland of a lake or stream.
- c) Create, enlarge, or diminish an inland lake or stream.
- d) Structurally interfere with the natural flow of an inland lake or stream.
- e) Construct, alter or extend a new or existing waterbody located within 500 feet of the ordinary high-water mark of an existing inland lake or stream and which connects to the existing inland lake or stream.

Any activities below the ordinary high water elevation.... of 1899.

-In paragraph 2, page 1-13, the following wording should be used:

The MDEQ monitors the MDOT to ensure compliance with Part 91, Soil Erosion and Sedimentation Control, of NREPA. MDOT is not ....Agency.

3

-In paragraph 3, page 1-13, we recommend rewording the first sentence to "A wetland permit from the MDEQ is required under Part 303, Wetland Protection, of NREPA to place fill material into a wetland, dredge, remove or permit removal of soils from a wetland, or to drain surface water from a wetland. The project ....the permit

4

#### Section 4.6.5

-1<sup>st</sup> paragraph, 2<sup>nd</sup> Sentence, page 4-33- The following wording should be changed to ... and Spring Lake participated in the Federal Emergency Management Agency program and have published Flood Insurance Rate maps and or Flood Insurance Studies.

5

-It should be noted that all rivers have a floodplain and floodway. Figures 4.6-4a and 4.6-4b are misleading in that only floodplains, which have been mapped, are shown. 1st paragraph, 2nd sentence, page 4-34 should be changed to "Figures 4.6-4a and 4.6-4b indicate the 100 year floodplains, which have been mapped. Floodplains for the other river have not been mapped and may also require permits."

-2<sup>nd</sup> Paragraph, 1<sup>st</sup> sentence, Page 4-33- The following wording should be used. The 100-year flood has been adopted by the Federal Emergency Management Agency....

6

-Page 4-34, 1<sup>st</sup> paragraph, 1st full sentence and the last sentence of page 5-49. The following wording should be used.

7

\*...1996, which amended Part 31 of Act 451, encroachment in the floodplain is limited to that which will cause a harmful interference with the discharge and stage characteristics of streams. Harmful interference is defined as likely to cause any of the following: 1) damage to property, 2) a threat to life, 3) a threat of personal injury, 4) pollution impairment, or destruction of water or other natural resources.

Note: In some cases no increase in stage would be allowed due to an encroachment.

Mr. Scott Hanley

3

January 11, 1999

#### Section 4.7 Ecological Resources

##### 4.7.1 Surface Water Quality, Pages 4-35 to 4-39.

##### Macatawa River

-The discussion of the Macatawa River is somewhat inaccurate. The entire Macatawa River watershed, including Lake Macatawa, has been identified as a nonattaining waterbody by the department and does not support designated uses. Causes of impairment include nutrient enrichment, poor macroinvertebrate communities, impaired fish communities, elevated turbidity, hydrologic instability, and sedimentation. Information contained in the following staff reports should be incorporated into the text, MI/DNR/SWQ-95/044, MI/DEQ/SWQ-97/067, MI/DEQ/SWQ-97/080, and MI/DEQ/SWQ-98/015. Copies of these reports are available through Mr. Scott Hanley of MDEQ's Surface Water Quality Division.

8

Page 4-37, paragraph 3 -should be rewritten as follows:

The Michigan Department of Environmental Quality has conducted a project to identify point and nonpoint sources of phosphorus loadings into Lake Macatawa. Lake Macatawa is currently experiencing algae blooms and is considered to be hypereutrophic. Phosphorus concentrations in the lake have been measured as high 250 micrograms/liter, compared to the MDEQ goal of 50 micrograms/liter. The project is in its second year and a majority of the sources of phosphorus loadings have been identified. The MDEQ conducted a one-year water quality-sampling program involving 44 sample locations. The results indicate 91% of the total phosphorus loadings is from nonpoint sources (agricultural, residential, and commercial) and 9% from municipal and industrial discharges.

9

##### Pigeon River

-The Pigeon River is also listed as a nonattaining waterbody by the department. Causes of impairment include poor fish and macroinvertebrate communities, nutrient enrichment, nuisance plant growths, sedimentation, and hydrologic instability. These stressors should not be considered minor water quality problems. Information included in staff report MI/DNR/SWQ-90/099 should be incorporated into the text. Also, the Pigeon River Watershed Advisory Council is working to improve the quality of the Pigeon River fishery, information contained in An Ecological Assessment of Opportunities for Fishery Rehabilitation (Wiley and Seelbach, 1998) should be consulted. Again, copies of these reports are available through Mr. Hanley.

10

##### Grand River

-Although the lower Grand River is on the nonattainment list for fish consumption advisories and combined sewer overflows, we do not agree with the overall conclusion that the water quality within the lower reaches is poor. The text does not contain the analytical results used by the Grand Valley State University Water Resources Institute to develop the Water Quality Index, therefore, no evaluation can be made. The water quality data collected by the Surface Water Quality Division and the United States Geological Survey indicate the lower Grand River does not exceed Water Quality Standards for the parameters listed in the draft EIS.

11

MR. JOHN FULLER

4

January 11, 1999

Page 4-39, paragraph 5.

-The point source discharges (NPDES permitted facilities) are regulated by the Department of Environmental Quality, not Natural Resources.

12

Section 4.7.3- Wetlands. page 4-39, 3rd sentence

-Michigan Resource Information System (MIRIS) maps can be less accurate than National Wetland Inventory (NWI) maps, due to the different years and types of aerial photography used in their photointerpretation. Therefore, we recommend omitting the third sentence of paragraph 1, page 4-42 and adding to the second sentence that both NWI and MIRIS maps were utilized in determining approximate locations of wetlands.

13

Wetland Identification Methods

-In paragraph 2, page 4-43: Please add the word "typically" before the word "must" in the last sentence, since there can be normal circumstances where not all three parameters are present, but an area can still be classified as a wetland per the United States Army Corps of Engineers (USCOE) delineation manual.

14

-Unlike the USCOE's manual, the MDEQ's draft Wetland Determination Manual does not require the presence of all three parameters (hydrophytic vegetation, hydric soils, and wetland hydrology) to classify land as wetland. Part 303 of the NREPA identifies that vegetation and hydrology are sufficient to identify an area as wetland, however, noting that soils can be used to verify the hydrology parameter. Since discrepancies between the USCOE and MDEQ can occur, please check your records for any areas that were not classified as wetland despite having had both hydrophytic vegetation and hydrology. If none exist, we recommend including a sentence in the DEIS noting that the findings of wetlands using the USCOE manual are/would be consistent with findings made using the DEQ manual.

15

-In paragraph 1, page 4-44: The use of the federal definition to exclude intermittent and perennial streams from being waters of the state is not appropriate. Part 301 and Part 303 of the NREPA require permits for activities within intermittent and perennial streams; therefore, these areas must be included in your review of the alignments and segments of the project.

16

-On page 4-45 first bullet: You may want to recheck field notes given that Enchanter's Nightshade (*Circaea lutetiana*) is a facultative upland species and Dwarf Enchanter's Nightshade (*Circaea alpina*) is a facultative wetland species.

17

-The sources used to depict the wetlands on maps 4.7-1a and 4.7-1b should be listed on the maps.

18

January 11, 1999

Section 5.7 Environmental Consequences

5.7.1 Surface Water Quality, Pages 5-56 and 5-57.

-The draft EIS indicates the greatest potential for water quality degradation would likely be associated with stream crossings but fails to identify the total number of crossings that may occur. This section is limited to only the major crossings of the Macatawa River, Pigeon River, and Grand River. Appendix A identifies numerous crossings of other surface waters, including designated trout streams, which will likely be impacted by such crossings. What impacts will these crossings have on local and watershed hydrology and the aquatic biota? The EIS should identify each of these crossings and provide information regarding these resources. The cumulative impacts of these crossings may be more detrimental to water quality and to fish and other aquatic life than the crossings of the major rivers. Without this information it is not possible to determine the environmental consequences the proposed alternatives may have on aquatic resources.

19

-Page 5-65, Could Table 5.7.3-2b be expanded to include the types of wetland impacts for each alternative within each watershed?

20

Section 6.6.5 Navigation

-2nd paragraph, page 6-24, last sentence. The number of piers, which are placed in the water, should be minimized and located outside of the main portion of the channel when possible.

21

-Any new bridge upstream of the existing US-31 should provide an adequate underclearance for any existing boat traffic.

22

Section 6.7 Mitigation

6.7.1 Surface Water Quality, Pages 6-25 and 6-26.

-The draft EIS indicates best management practices will be employed during construction to mitigate short-term water quality impacts. How will potential long-term impacts such as increased hydrologic loadings be mitigated? Also, what measures will be taken to mitigate the loss of aquatic habitat associated with dredging and bridge construction?

23

Section 6.7.3.1 State and Federal Wetland Mitigation Requirements:

-1<sup>st</sup> paragraph, page 6-27 We recommend changing the word "is" to "can be", to say that wetland mitigation can be required by either or both the NREPA and Section 404 of the Clean Water Act for unavoidable impacts to wetlands. The MDEQ can make a decision, separate of the USCOE, on whether to require mitigation or not.

24

6.7.3 Wetland Mitigation, Page 6-28.

-The draft EIS indicates wetland mitigation sites will not include areas east of 120<sup>th</sup> Avenue. Many of the impairments identified in both the Macatawa River and Pigeon River watersheds are linked to hydrologic modifications due to wetland losses, primarily in the headwater regions. The Macatawa Area Coordinating Committee and the Pigeon River Watershed Council have identified headwater wetland restoration as a means to rehabilitate lost designated uses in these watersheds. In order to maximize the benefits of wetland mitigation, we recommend the target area for wetland mitigation sites include the headwater regions east of 120<sup>th</sup> Avenue.

25

Macatawa Mitigation Site # 1 & 2, Page 6-36 & 6-38

-Have the private landowners expressed an interest in selling these sites? If not, they should not be listed as potential sites.

26

Pigeon River Mitigation Site #1 & 2, page 6-39 & 6-40

-Have the private landowners expressed an interest in selling these sites? If not, they should not be listed as potential sites.

Pigeon River Mitigation Site #4, page 6-42

-Same concern with private ownership as indicated above. Also, any proposed mitigation site should not be used as a filter to clean effluent from the Sara Lee Corporation turkey operation. If this water has already been treated properly it may be suitable.

Pigeon River Mitigation Sites #5 and #6- Page 6.43, Grand River Wetland Mitigation Area #1 and #2- page 6-46, Grand River Wetland Mitigation Area #3-page 6.47

27

- All these sites were identified as being prior converted. Prior converted needs to be defined. Prior converted does not necessarily mean that these sites can be used for mitigation. We would require that the sites had been continuously farmed since 1980 and had been effectively drained since 1980. Effectively drained is defined as meaning that if the farming operation ceased the wetlands would not be restored on their own because the drainage system prevents the re-establishment of the hydrology.

-The same comment on private ownership would apply for any of the Grand River sites.

Grand River Potential Mitigation Sites- page 6-45, Grand River Wetland Mitigation Area #3 and #4-page 6-48.

28

-The term shrub-carr wetlands is used. Should this be shrub-scrub?

Grand River Wetland Mitigation Area #4, page 6-48

-Has the DNR made any commitment allowing this site to be used for mitigation? If not, it may have to be dropped as a potential candidate.

29

Grand River Potential Wetland Mitigation Sites, page 6-45

-MDEQ requests that other potential riverine floodplain mitigation sites along the Grand River be identified to offset any riverine wetland loss associated with this project.

30

Impacts During Construction, page 6-57

-It is expected that methods listed in this section to avoid impacts to the waterways and wetland areas will be coordinated with the permitting agencies well before a final design is submitted.

31

Section 7: list of preparers, page 7-2

-Jerry Fulcher has 18 years of experience, not 10 as indicated.

January 11, 1999

Section 9, Purpose and Need for the Proposed Action, page 9-2

-The MDEQ/MDNR concurred as to purpose and need in its November 29, 1994 letter to Mr. Ron Kinney of the Michigan Department of Transportation.

-The paragraph concerning the MDNR comments on page 9-4 should be included under comments of the NEPA/404 Coordinating agencies on page 9-3. At that time MDNR was one of the coordinating agencies

32

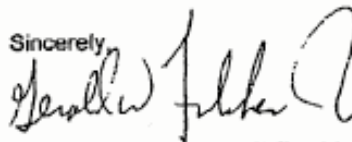
Alternatives to be Carried Forward for Detail Study, page 9-4

-Concurrence on the Alternatives to be Carried Forward for Detailed Study was not received from the MDEQ. In its October 17, 1996 memo to Mr. Michael Jaeger the MDEQ indicated that it would comment of the alternatives to carry forward during review of the Draft EIS.

33

If you have any questions please feel free to 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. Jim Kirshenleiner, USFHWA  
Mr. Mike MacMullen, USEPA  
Mr. Gary Mannesto, USCOE  
Mr. Charles Wooley, USFWS  
Mr. George Burgoyne, MDNR  
Mr. Scott Hanshue, MDEQ, SWQD  
Mr. Luis Saldivia, MDEQ, LWMD  
Ms. Kim Rice, MDEQ, LWMD  
Ms. Peg Bostwick, MDEQ, LWMD  
Mr. Stu Kogge, MDEQ, LWMD  
Ms. Holly Vickers, MDEQ, LWMD

**Michigan Department of Environmental Quality (MDEQ), January 11, 1999**

1. Comment acknowledged. The Preferred Alternative no longer impacts the Pigeon River or its watershed.
2. The need for permits from the MDEQ is acknowledged. Specific permits required by all governing agencies are noted in **Section 4.22**
3. Comment acknowledged. MDOT is now its own permitting agency, and monitors Soil Erosion and Sedimentation Control measures internally.
4. The discussion on permits is no longer in **Section 1** and therefore this recommended wording change can not be made. Permits required are noted in **Section 4.22**, and revised as per Comment 3.
5. The Preferred Alternative no longer impacts Spring Lake.
6. The wording has been changed to reflect this, see **Section 4.11**.
7. The wording has been changed to reflect this, see **Section 4.11**.
8. Although no longer directly impacted by the Preferred Alternative, information concerning the Macatawa River in **Section 4.10** has been revised to include the most up-to-date MDEQ staff reports and on-going studies of the Macatawa River Watershed.
9. Although no longer directly impacted by the Preferred Alternative, information concerning the Macatawa River in **Section 4.10** has been revised to include the most up-to-date MDEQ staff reports and on-going studies of the Macatawa River Watershed.
10. The Preferred Alternative no longer impacts the Pigeon River.
11. Revised discussion of the Grand River in **Section 4.10** to include a discussion of water quality based on recent data collected. The statement "Water quality in the Grand River near Grand Haven exceeds water quality standards for mercury" was included in the MDEQ Water Bureau September 2005 Staff Report (MI/DQ/WB-05/097). The GVSU study was deleted and substituted with more recent water quality data.
12. The wording has been changed to reflect this, see **Section 4.10**.
13. Both National Wetland Inventory (NWI) maps and MDEQ's Wetland Inventory map for Ottawa County were used for site reconnaissance for all wetland field work performed in 2007. **Section 4.9** has been revised, accordingly.
14. This wording is no longer included in the revised **Section 4.9**.
15. This wording no longer included in the revised **Section 4.9**.
16. This wording no longer included in the revised **Section 4.9**.
17. This plant species is no longer included in the revised **Section 4.9**.

18. The source used to depict the wetlands are National Wetland Inventory and delineated wetland boundary points.
19. The Preferred Alternative will cross several designated drains and roadside ditches. A table has been added to **Section 4.11** that lists all of the stream crossings and their locations. There is a statement about water quality impacts, fish impacts, as well as mitigation for fish impacts in **Section 4.10**. The type of structure to be used at these locations will be determined during final design. Where structures are used to cross streams with known populations of fish species of concern, measures will be taken to provide passage through the structure, such as suppressing the invert of the culvert or installing a bottomless arch. Water Quality impacts should be temporary and limited to the construction period. Storm water management will be provided to permanently treat runoff from the highways and bridges.
20. **Table 4.9-1** quantifies direct wetland impacts for the Preferred Alternative by wetland type. All wetland impacts are within the Grand River Watershed.
21. Piers near the Grand Rivers navigation channel will be minimized and located to minimize the potential for impact and need for pier protection as much as possible, see **Sections 4.10, 4.11, and 4.20**.
22. Comment acknowledged. A minimum vertical height of 35 feet has been tentatively agreed upon in consultation with the U.S. Coast Guard, to provide adequate underclearance at this location **Section 4.11**.
23. Potential long-term impacts such as increased hydrologic loadings are mitigated through storm water management. Storm water from roads and bridges will be collected and routed to first flush basins before being discharged to surface waters. Information on storm water management is included in **Section 4.10**. Hydraulic loadings are discussed in **Section 4.10**. The loss of aquatic habitat associated with dredging and bridge construction would only be temporary. Benthic organisms would reestablish within the dredged areas in one to two years. Dredged material (at river crossings) may be confined by the construction of temporary cofferdams, the use of top-down construction methods, construction from barges, etc., and dredged material will be placed on upland disposal sites. These construction methods are mentioned in **Section 4.20**
24. Comment acknowledged and changed.
25. The Preferred Alternative no longer impacts wetlands in the Macatawa or Pigeon River watersheds. Therefore mitigation is not required for these rivers.
26. The Preferred Alternative no longer impacts wetlands in the Macatawa or Pigeon River watersheds. Therefore mitigation is not required for these rivers.
27. Two potential mitigation sites, the Bolthouse Property and the Rogers property, are prior converted cropland. The definition of prior converted was added to the wetland mitigation portion of the FEIS.
28. Comment acknowledged. Wording has been changed.

29. The potential Grand River mitigation site owned by the Michigan Department of Natural Resources is no longer considered as a potential wetland mitigation site.
30. Two sites were identified, which will address mitigation requirements.
31. MDOT will coordinate with resource agencies prior to final design.
32. Comment acknowledged. **Section 5.2** of the FEIS contains a discussion of Cooperating and Resource Agencies. In addition, it should be noted that during the DEIS process prior to 1998, the original MDNR was split into two entities: the MDNR and the MDEQ.
33. Comment acknowledged.



JOHN ENGLER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



RUSSELL J. HARDING  
DIRECTOR

July 25, 2002

Ms. Theresa Petko  
URS Corporation  
3950 Sparks Drive, SE  
Grand Rapids, Michigan 49546

Dear Ms. Petko:

SUBJECT: Coastal Zone Management Act Federal Consistency Determination for US-31 from I-196 in Allegan County north to I-96 in Muskegon County

Staff of the Land and Water Management Division (LWMD) has reviewed the above-referenced project for consistency with the Michigan Coastal Management Program, as required by Section 307 of the Coastal Zone Management Act, PL 92-583, as amended. Thank you for providing the opportunity to review these projects.

The permitting criteria contained in Part 303 (Wetland Protection), Part 301 (Inland Lakes and Streams), and Part 91 (Soil Erosion and Sedimentation Control) of the Natural Resources and Environmental Protection Act, 1994 P.A. 451, as amended, comprise the standards and enforceable policies of the Michigan Coastal Management Program that would be relevant to this particular project. Potential impacts to coastal resources will be considered during the permit review process. Issuance of all necessary permits will certify that the activities for which the permit is issued is consistent with Michigan's Coastal Management Program.

LWMD staff has expressed concern with possible impacts to resources outside the coastal boundary. Although these concerns are beyond the purview of the consistency review process, we encourage you to continue to work with LWMD staff and the Michigan Department of Transportation through the NEPA process toward resolution of these issues.

This consistency determination does not waive the need for permits that may be required under other federal, state or local statutes. Please call me if you have any questions regarding this review.

Sincerely,

Christy L. Fox  
Michigan Coastal Management Program  
Land and Water Management Division  
517-335-3452

cc: Ms. Holly Vickers, LWMD  
Mr. David Schuen, MDOT

**MDEQ, LWMD, Michigan Coastal Management Program, July 25, 2002**  
Comment Acknowledged

AERONAUTICS COMMISSION

John K. Boerema, Chair  
Alice J. Gustafson, Vice Chair  
Joseph M. Pietro  
Arnold P. Saviano  
Lowell E. Kraft  
James R. DeSana  
Guy Gordon  
Capt. Jeffrey J. Steffel  
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STATE OF MICHIGAN



JOHN ENGLER, GOVERNOR

DEPARTMENT OF TRANSPORTATION

2700 EAST AIRPORT SERVICE DRIVE, LANSING, MICHIGAN 48906-2160

PHONE: (517) 335-8283 FAX NO.: (517) 321-6422

James R. DeSana, DIRECTOR

January 8, 1999

Mr. Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

Subject: Review of Draft Environmental Impact Statement  
US-31 from I-196 in Allegan County North to I-96 in Muskegon County

We have reviewed the draft document dated October 23, 1998, which was transmitted to this office. Our comments on this draft are as follows:

There are a number of airports in the vicinity of the proposed project, which causes the Michigan Department of Transportation, Bureau of Aeronautics concern. Those airports are under grant obligations and/or licensing obligations by the State of Michigan and the U.S. Department of Transportation's Federal Aviation Administration (FAA), and must meet state and federal rules and regulations. These include the Tulip City Airport, Holland; the Park Township Airport, Holland; the Ottawa Executive Airport, Zeeland; the Flying-A-Ranch, Fruitport; the Hat Field Airport, Nunica; the Jablonski Airport, Nunica; Memorial Airpark, Grand Haven; and the Muskegon County Airport, Muskegon.

Due to major adverse impacts to the Memorial Airpark, Grand Haven, we strongly object to Alternatives P and P1r. Pursuit of either of those alternatives impacts facilities which have been invested in with both state and federal funds.

Alternatives 2005/2020 TSM, A, F, F1/F3, F/J1, J1, and R are acceptable provided that any construction meets all State of Michigan and FAA aviation laws, regulations, and requirements, including those for approach protection and safe airport operation.

Please note more specifically, that any alternative with associated construction of retention or detention basins, wetland mitigation sites, or other wildlife attractants must be designed and implemented in accordance with FAA Advisory Circular 150/5200-33 (copy enclosed).

If you have any questions concerning these comments, please call me at (517) 335-9866.

Sincerely,

Elise A. Harrington, P.E.  
Environmental Liaison  
Airports Division  
BUREAU OF AERONAUTICS

cc: Ron Kinney, Manager, Environmental Section, Project Planning Division, MDOT  
Warren Benaway, Airport Manager, Memorial Airpark, Grand Haven  
Ernest Gubry, FAA-ADO  
Mark Dontje

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U.S. Department  
of Transportation

Federal Aviation  
Administration

# Advisory Circular

Subject: HAZARDOUS WILDLIFE ATTRACTANTS ON  
OR NEAR AIRPORTS

Date: 5/1/97  
Initiated by:  
AAS-310 and APP-600

AC No: 150/5200-33  
Change:

**1. PURPOSE.** This advisory circular (AC) provides guidance on locating certain land uses having the potential to attract hazardous wildlife to or in the vicinity of public-use airports. It also provides guidance concerning the placement of new airport development projects (including airport construction, expansion, and renovation) pertaining to aircraft movement in the vicinity of hazardous wildlife attractants. Appendix 1 provides definitions of terms used in this AC.

**2. APPLICATION.** The standards, practices, and suggestions contained in this AC are recommended by the Federal Aviation Administration (FAA) for use by the operators and sponsors of all public-use airports. In addition, the standards, practices, and suggestions contained in this AC are recommended by the FAA as guidance for land use planners, operators, and developers of projects, facilities, and activities on or near airports.

**3. BACKGROUND.** Populations of many species of wildlife have increased markedly in the

last few years. Some of these species are able to adapt to human-made environments, such as exist on and around airports. The increase in wildlife populations, the use of larger turbine engines, the increased use of twin-engine aircraft, and the increase in air-traffic, all combine to increase the risk, frequency, and potential severity of wildlife-aircraft collisions.

Most public-use airports have large tracts of open, unimproved land that are desirable for added margins of safety and noise mitigation. These areas can present potential hazards to aviation because they often attract hazardous wildlife. During the past century, wildlife-aircraft strikes have resulted in the loss of hundreds of lives world-wide, as well as billions of dollars worth of aircraft damage. Hazardous wildlife attractants near airports could jeopardize future airport expansion because of safety considerations.

DAVID L. BENNETT  
Director, Office of Airport Safety and Standards

5/1/97

AC 150/5200-33

## SECTION 1. HAZARDOUS WILDLIFE ATTRACTANTS ON OR NEAR AIRPORTS.

### 1-1. TYPES OF HAZARDOUS WILDLIFE ATTRACTANTS ON OR NEAR AIRPORTS.

Human-made or natural areas, such as poorly-drained areas, retention ponds, roosting habitats on buildings, landscaping, putrescible-waste disposal operations, wastewater treatment plants, agricultural or aquacultural activities, surface mining, or wetlands, may be used by wildlife for escape, feeding, loafing, or reproduction. Wildlife use of areas within an airport's approach or departure airspace, aircraft movement areas, loading ramps, or aircraft parking areas may cause conditions hazardous to aircraft safety.

All species of wildlife can pose a threat to aircraft safety. However, some species are more commonly involved in aircraft strikes than others. Table 1 lists the wildlife groups commonly reported as being involved in damaging strikes to U.S. aircraft from 1993 to 1995.

Table 1. Wildlife Groups Involved in Damaging Strikes to Civilian Aircraft, USA, 1993-1995.

Wildlife Groups	Percent involvement in reported damaging strikes
Gulls	28
Waterfowl	28
Raptors	11
Doves	6
Vultures	5
Blackbirds-	5
Starlings	
Corvids	3
Wading birds	3
Deer	11
Canids	1

**1-2. LAND USE PRACTICES.** Land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. FAA recommends against land use practices, within the siting criteria stated in 1-3, that attract or sustain populations of hazardous wildlife within the vicinity of airports or cause movement of hazardous wildlife onto, into, or across the approach or departure airspace, aircraft movement area, loading ramps, or aircraft parking area of airports.

Airport operators, sponsors, planners, and land use developers should consider whether proposed land uses, including new airport development projects, would increase the wildlife hazard. Caution should be exercised to ensure that land use practices on or near airports do not enhance the attractiveness of the area to hazardous wildlife.

**1-3. SITING CRITERIA.** FAA recommends separations when siting any of the wildlife attractants mentioned in Section 2 or when planning new airport development projects to accommodate aircraft movement. The distance between an airport's aircraft movement areas, loading ramps, or aircraft parking areas and the wildlife attractant should be as follows:

a. Airports serving piston-powered aircraft. A distance of 5,000 feet is recommended.

b. Airports serving turbine-powered aircraft. A distance of 10,000 feet is recommended.

c. Approach or Departure airspace. A distance of 5 statute miles is recommended, if the wildlife attractant may cause hazardous wildlife movement into or across the approach or departure airspace.

1 (and 2)

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## SECTION 2. LAND USES THAT ARE INCOMPATIBLE WITH SAFE AIRPORT OPERATIONS.

**2-1. GENERAL.** The wildlife species and the size of the populations attracted to the airport environment are highly variable and may depend on several factors, including land-use practices on or near the airport. It is important to identify those land use practices in the airport area that attract hazardous wildlife. This section discusses land use practices known to threaten aviation safety.

**2-2. PUTRESCIBLE-WASTE DISPOSAL OPERATIONS.** Putrescible-waste disposal operations are known to attract large numbers of wildlife that are hazardous to aircraft. Because of this, these operations, when located within the separations identified in the siting criteria in 1-3 are considered incompatible with safe airport operations.

FAA recommends against locating putrescible-waste disposal operations inside the separations identified in the siting criteria mentioned above. FAA also recommends against new airport development projects that would increase the number of aircraft operations or that would accommodate larger or faster aircraft, near putrescible-waste disposal operations located within the separations identified in the siting criteria in 1-3.

**2-3. WASTEWATER TREATMENT FACILITIES.** Wastewater treatment facilities and associated settling ponds often attract large numbers of wildlife that can pose a threat to aircraft safety when they are located on or near an airport.

**a. New wastewater treatment facilities.** FAA recommends against the construction of new wastewater treatment facilities or associated settling ponds within the separations identified in the siting criteria in 1-3. During the siting analysis for wastewater treatment facilities, the potential to attract hazardous wildlife should be considered if an airport is in the vicinity of a proposed site. Airport operators should voice their opposition to such sitings. In addition, they should consider the existence of wastewater treatment facilities when evaluating proposed sites for new airport development projects and avoid such sites when practicable.

**b. Existing wastewater treatment facilities.** FAA recommends correcting any wildlife hazards arising from existing wastewater treatment facilities located on or near airports without delay, using appropriate wildlife hazard mitigation techniques. Accordingly, measures to minimize hazardous wildlife attraction should be developed in consultation with a wildlife damage management biologist. FAA recommends that wastewater treatment facility operators incorporate appropriate wildlife hazard mitigation techniques into their operating practices. Airport operators also should encourage those operators to incorporate these mitigation techniques in their operating practices.

**c. Artificial marshes.** Waste-water treatment facilities may create artificial marshes and use submergent and emergent aquatic vegetation as natural filters. These artificial marshes may be used by some species of flocking birds, such as blackbirds and waterfowl, for breeding or roosting activities. FAA recommends against establishing artificial marshes within the separations identified in the siting criteria stated in 1-3.

**d. Wastewater discharge and sludge disposal.** FAA recommends against the discharge of wastewater or sludge on airport property. Regular spraying of wastewater or sludge disposal on unpaved areas may improve soil moisture and quality. The resultant turf growth requires more frequent mowing, which in turn may mutilate or flush insects or small animals and produce straw. The maimed or flushed organisms and the straw can attract hazardous wildlife and jeopardize aviation safety. In addition, the improved turf may attract grazing wildlife such as deer and geese.

Problems may also occur when discharges saturate unpaved airport areas. The resultant soft, muddy conditions can severely restrict or prevent emergency vehicles from reaching accident sites in a timely manner.

**e. Underwater waste discharges.** The underwater discharge of any food waste, e.g., fish processing offal, that could attract scavenging wildlife is not recommended within the separations identified in the siting criteria in 1-3.

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## 2-4. WETLANDS.

### a. Wetlands on or near Airports.

(1) **Existing Airports.** Normally, wetlands are attractive to many wildlife species. Airport operators with wetlands located on or nearby airport property should be alert to any wildlife use or habitat changes in these areas that could affect safe aircraft operations.

(2) **Airport Development.** When practicable, the FAA recommends siting new airports using the separations identified in the siting criteria in 1-3. Where alternative sites are not practicable or when expanding existing airports in or near wetlands, the wildlife hazards should be evaluated and minimized through a wildlife management plan prepared by a wildlife damage management biologist, in consultation with the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (COE).

NOTE: If questions exist as to whether or not an area would qualify as a wetland, contact the U.S. Army COE, the Natural Resource Conservation Service, or a wetland consultant certified to delineate wetlands.

b. **Wetland mitigation.** Mitigation may be necessary when unavoidable wetland disturbances result from new airport development projects. Wetland mitigation should be designed so it does not create a wildlife hazard.

(1) FAA recommends that wetland mitigation projects that may attract hazardous wildlife be sited outside of the separations

identified in the siting criteria in 1-3. Wetland mitigation banks meeting these siting criteria offer an ecologically sound approach to mitigation in these situations.

(2) Exceptions to locating mitigation activities outside the separations identified in the siting criteria in 1-3 may be considered if the affected wetlands provide unique ecological functions, such as critical habitat for threatened or endangered species or ground water recharge. Such mitigation must be compatible with safe airport operations. Enhancing such mitigation areas to attract hazardous wildlife should be avoided. On-site mitigation plans may be reviewed by the FAA to determine compatibility with safe airport operations.

(3) Wetland mitigation projects that are needed to protect unique wetland functions (see 2-4.b.(2)), and that must be located in the siting criteria in 1-3 should be identified and evaluated by a wildlife damage management biologist before implementing the mitigation. A wildlife damage management plan should be developed to reduce the wildlife hazards.

NOTE: AC 150/5000-3, *Address List for Regional Airports Division and Airports District/Field Offices*, provides information on the location of these offices.

2-5. **DREDGE SPOIL CONTAINMENT AREAS.** FAA recommends against locating dredge spoil containment areas within the separations identified in the siting criteria in 1-3, if the spoil contains material that would attract hazardous wildlife.

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### SECTION 3. LAND USES THAT MAY BE COMPATIBLE WITH SAFE AIRPORT OPERATIONS.

**3-1. GENERAL.** Even though they may, under certain circumstances, attract hazardous wildlife, the land use practices discussed in this section have flexibility regarding their location or operation and may even be under the airport operator's or sponsor's control. In general, the FAA does not consider the activities discussed below as hazardous to aviation if there is no apparent attraction to hazardous wildlife, or wildlife hazard mitigation techniques are implemented to deal effectively with any wildlife hazard that may arise.

**3-2. ENCLOSED WASTE FACILITIES.** Enclosed trash transfer stations or enclosed waste handling facilities that receive garbage indoors; process it via compaction, incineration, or similar manner; and remove all residue by enclosed vehicles, generally would be compatible, from a wildlife perspective, with safe airport operations, provided they are not located on airport property or within the runway protection zone (RPZ). No putrescible-waste should be handled or stored outside at any time, for any reason, or in a partially enclosed structure accessible to hazardous wildlife.

Partially enclosed operations that accept putrescible-waste are considered to be incompatible with safe airport operations. FAA recommends these operations occur outside the separations identified in the siting criteria in 1-3.

**3-3. RECYCLING CENTERS.** Recycling centers that accept previously sorted, non-food items such as glass, newspaper, cardboard, or aluminum are, in most cases, not attractive to hazardous wildlife.

**3-4. COMPOSTING OPERATIONS ON AIRPORTS.** FAA recommends against locating composting operations on airports. However, when they are located on an airport, composting operations should not be located closer than the greater of the following distances: 1,200 feet from any aircraft movement area, loading ramp, or aircraft parking space; or the distance called for by airport design requirements. This spacing is intended to prevent material, personnel, or equipment from penetrating any Obstacle Free Area (OFA), Obstacle Free Zone (OFZ), Threshold Siting Surface (TSS), or Clearway (see AC 150/5300-13, *Airport Design*). On-airport disposal of compost by-products is not recommended for the reasons stated in 2-3.d.

**a. Composition of material handled.** Components of the compost should never include any municipal solid waste. Non-food waste such as leaves, lawn clippings, branches, and twigs generally are not considered a wildlife attractant. Sewage sludge, wood-chips, and similar material are not municipal solid wastes and may be used as compost bulking agents.

**b. Monitoring on-airport composting operations.** If composting operations are to be located on airport property, FAA recommends that the airport operator monitor composting operations to ensure that steam or thermal rise does not affect air traffic in any way. Discarded leaf disposal bags or other debris must not be allowed to blow onto any active airport area. Also, the airport operator should reserve the right to stop any operation that creates unsafe, undesirable, or incompatible conditions at the airport.

**3-5. ASH DISPOSAL.** Fly ash from resource recovery facilities that are fired by municipal solid waste, coal, or wood, is generally considered not to be a wildlife attractant because it contains no putrescible matter. FAA generally does not consider landfills accepting only fly ash to be wildlife attractants, if those landfills: are maintained in an orderly manner; admit no putrescible-waste of any kind; and are not co-located with other disposal operations.

Since varying degrees of waste consumption are associated with general incineration, FAA classifies the ash from general incinerators as a regular waste disposal by-product and, therefore, a hazardous wildlife attractant.

**3-6. CONSTRUCTION AND DEMOLITION (C&D) DEBRIS LANDFILLS.** C&D debris (Class IV) landfills have visual and operational characteristics similar to putrescible-waste disposal sites. When co-located with putrescible-waste disposal operations, the probability of hazardous wildlife attraction to C&D landfills increases because of the similarities between these disposal activities.

FAA generally does not consider C&D landfills to be hazardous wildlife attractants, if those landfills: are maintained in an orderly manner; admit no putrescible-waste of any kind; and are not co-located with other disposal operations.

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**3-7. WATER DETENTION OR RETENTION PONDS.** The movement of storm water away from runways, taxiways, and aprons is a normal function on most airports and is necessary for safe aircraft operations. Detention ponds hold storm water for short periods, while retention ponds hold water indefinitely. Both types of ponds control runoff, protect water quality, and can attract hazardous wildlife. Retention ponds are more attractive to hazardous wildlife than detention ponds because they provide a more reliable water source.

To facilitate hazardous wildlife control, FAA recommends using steep-sided, narrow, linearly-shaped, rip-rap lined, water detention basins rather than retention basins. When possible, these ponds should be placed away from aircraft movement areas to minimize aircraft-wildlife interactions. All vegetation in or around detention or retention basins that provide food or cover for hazardous wildlife should be eliminated.

If soil conditions and other requirements allow, FAA encourages the use of underground storm water infiltration systems, such as French drains or buried rock fields, because they are less attractive to wildlife.

**3-8. LANDSCAPING.** Wildlife attraction to landscaping may vary by geographic location. FAA recommends that airport operators approach landscaping with caution and confine it to airport areas not associated with aircraft movements. All landscaping plans should be reviewed by a wildlife damage management biologist. Landscaped areas should be monitored on a continuing basis for the presence of hazardous wildlife. If hazardous wildlife is detected, corrective actions should be implemented immediately.

**3-9. GOLF COURSES.** Golf courses may be beneficial to airports because they provide open space that can be used for noise mitigation or by aircraft during an emergency. On-airport golf courses may also be a concurrent use that provides income to the airport.

Because of operational and monetary benefits, golf courses are often deemed compatible land uses on or near airports. However, waterfowl (especially Canada geese) and some species of gulls are attracted to the large, grassy areas and open water found on most golf courses. Because waterfowl and gulls occur throughout the U.S., FAA recommends that airport operators exercise caution and consult with a wildlife damage management biologist when considering proposals for golf

course construction or expansion on or near airports. Golf courses should be monitored on a continuing basis for the presence of hazardous wildlife. If hazardous wildlife is detected, corrective actions should be implemented immediately.

**3-10. AGRICULTURAL CROPS.** As noted above, airport operators often promote revenue-generating activities to supplement an airport's financial viability. A common concurrent use is agricultural crop production. Such use may create potential hazards to aircraft by attracting wildlife. Any proposed on-airport agricultural operations should be reviewed by a wildlife damage management biologist. FAA generally does not object to agricultural crop production on airports when: wildlife hazards are not predicted; the guidelines for the airport areas specified in 3-10.a-f are observed; and the agricultural operation is closely monitored by the airport operator or sponsor to ensure that hazardous wildlife are not attracted.

**NOTE:** If wildlife becomes a problem due to on-airport agricultural operations, FAA recommends undertaking the remedial actions described in 3-10.f.

a. **Agricultural activities adjacent to runways.** To ensure safe, efficient aircraft operations, FAA recommends that no agricultural activities be conducted in the Runway Safety Area (RSA), OFA, and the OFZ (see AC 150/5300-13).

b. **Agricultural activities in areas requiring minimum object clearances.** Restricting agricultural operations to areas outside the RSA, OFA, OFZ, and Runway Visibility Zone (RVZ) (see AC 150/5300-13) will normally provide the minimum object clearances required by FAA's airport design standards. FAA recommends that farming operations not be permitted within areas critical to the proper operation of localizers, glide slope indicators, or other visual or electronic navigational aids. Determinations of minimal areas that must be kept free of farming operations should be made on a case-by-case basis. If navigational aids are present, farm leases for on-airport agricultural activities should be coordinated with FAA's Airway Facilities Division, in accordance with FAA Order 6750.16, *Siting Criteria for Instrument Landing Systems*.

**NOTE:** Crop restriction lines conforming to the dimensions set forth in Table 2 will normally provide the minimum object clearance required by

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FAA airport design standards. The presence of navigational aids may require expansion of the restricted area.

c. **Agricultural activities within an airport's approach areas.** The RSA, OFA, and OFZ all extend beyond the runway shoulder and into the approach area by varying distances. The OFA normally extends the farthest and is usually the controlling surface. However, for some runways, the TSS (see AC 150/5300-13, Appendix 2) may be more controlling than the OFA. The TSS may not be penetrated by any object. The minimum distances shown in Table 2 are intended to prevent penetration of the OFA, OFZ, or TSS by crops or farm machinery.

**NOTE:** Threshold Siting standards should not be confused with the approach areas described in Title 14, Code of Federal Regulations, Part 77, (14 CFR 77), *Objects Affecting Navigable Airspace*.

d. **Agricultural activities between intersecting runways.** FAA recommends that no agricultural activities be permitted within the RVZ. If the terrain is sufficiently below the runway elevation, some types of crops and equipment may be acceptable. Specific determinations of what is permissible in this area requires topographical data. For example, if the terrain within the RVZ is level with the runway ends, farm machinery or crops may interfere with a pilot's line-of-sight in the RVZ.

e. **Agricultural activities in areas adjacent to taxiways and aprons.** Farming activities should not be permitted within a taxiway's OFA. The outer portions of aprons are frequently used as a taxilane and farming operations should not be permitted within the OFA. Farming operations should not be permitted between runways and parallel taxiways.

f. **Remedial actions for problematic agricultural activities.** If a problem with hazardous wildlife develops, FAA recommends that a professional wildlife damage management biologist be contacted and an on-site inspection be conducted. The biologist should be requested to determine the source of the hazardous wildlife attraction and suggest remedial action. Regardless of the source of the attraction, prompt remedial actions to protect aviation safety are recommended. The remedial actions may range from choosing another crop or farming technique to complete termination of the agricultural operation.

Whenever on-airport agricultural operations are stopped due to wildlife hazards or annual harvest, FAA recommends plowing under all crop residue and harrowing the surface area smooth. This will reduce or eliminate the area's attractiveness to foraging wildlife. FAA recommends that this requirement be written into all on-airport farm use contracts and clearly understood by the lessee.

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Table 2. Minimum Distances Between Certain Airport Features And Any On-Airport Agriculture Crops.

Aircraft Approach Category And Design Group <sup>1</sup>	Distance In Feet From Runway Centerline To Crop		Distance In Feet From Runway End To Crop		Distance In Feet From Centerline Of Taxiway To Crop	Distance In Feet From Edge Of Apron To Crop
	Visual & ≥ ½ mile	< ½ mile	Visual & ≥ ½ mile	< ½ mile		
Category A & B Aircraft						
Group I	200 <sup>2</sup>	400	300 <sup>3</sup>	600	45	40
Group II	250	400	400 <sup>3</sup>	600	66	58
Group III	400	400	600	800	93	81
Group IV	400	400	1,000	1,000	130	113
Category C, D & E Aircraft						
Group I	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	45	40
Group II	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	66	58
Group III	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	93	81
Group IV	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	130	113
Group V	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	160	138
Group VI	530 <sup>3</sup>	575 <sup>3</sup>	1,000	1,000	193	167

1. Design Groups are based on wing span, and Category depends on approach speed of the aircraft.

Group I: Wing span up to 49 ft.

Group II: Wing span 49 ft. up to 78 ft.

Group III: Wing span 79 ft. up to 117 ft.

Group IV: Wing span 118 ft. up to 170 ft.

Group V: Wing span 171 ft. up to 213 ft.

Group VI: Wing span 214 ft. up to 261 ft.

Category A:

Category B:

Category C:

Category D:

Category E:

2. If the runway will only serve small airplanes (12,500 lb. and under) in Design Group I, this dimension may be reduced to 125 feet; however, this dimension should be increased where necessary to accommodate visual navigational aids that may be installed. For example farming operations should not be allowed within 25 feet of a Precision Approach Path Indicator (PAPI) light box.

3. These dimensions reflect the TSS as defined in AC 150/5300-13, Appendix 2. The TSS cannot be penetrated by any object. Under these conditions, the TSS is more restrictive than the OFA, and the dimensions shown here are to prevent penetration of the TSS by crops and farm machinery.

5/1/97

AC 150/5200-33

#### SECTION 4. NOTIFICATION OF FAA ABOUT HAZARDOUS WILDLIFE ATTRACTANTS ON OR NEAR AN AIRPORT.

**4-1. GENERAL.** Airport operators, land developers, and owners should notify the FAA in writing of known or reasonably foreseeable land use practices on or near airports that either attract or may attract hazardous wildlife. This section discusses those notification procedures.

**4-2. NOTIFICATION REQUIREMENTS FOR WASTE DISPOSAL SITE OPERATIONS.** The Environmental Protection Agency (EPA) requires any operator proposing a new or expanded waste disposal operation within 5 statute miles of a runway end to notify the appropriate FAA Regional Airports Division Office and the airport operator of the proposal (40 CFR 258, *Criteria for Municipal Solid Waste Landfills*, section 258.10, *Airport Safety*). The EPA also requires owners or operators of new municipal solid waste landfill (MSWLF) units, or lateral expansions of existing MSWLF units that are located within 10,000 feet of any airport runway end used by turbojet aircraft or within 5,000 feet of any airport runway end used only by piston-type aircraft, to demonstrate successfully that such units are not hazards to aircraft.

**a. Timing of Notification.** When new or expanded MSWLFs are being proposed near airports, MSWLF operators should notify the airport operator and the FAA of this as early as possible pursuant to 40 CFR Part 258. Airport operators should encourage the MSWLF operators to provide notification as early as possible.

**NOTE:** AC 150/5000-3 provides information on these FAA offices.

**b. Putrescible-Waste Facilities.** In their effort to satisfy the EPA requirement, some putrescible-waste facility proponents may offer to undertake experimental measures to demonstrate that their proposed facility will not be a hazard to aircraft. To date, the ability to sustain a reduction in the numbers of hazardous wildlife to levels that existed before a putrescible-waste landfill began operating has not been successfully demonstrated. For this reason, demonstrations of experimental wildlife control measures should not be conducted in active aircraft operations areas.

**c. Other Waste Facilities.** To claim successfully that a waste handling facility sited within the separations identified in the siting criteria in 1-3

does not attract hazardous wildlife and does not threaten aviation, the developer must establish convincingly that the facility will not handle putrescible material other than that as outlined in 3-2. FAA requests that waste site developers provide a copy of an official permit request verifying that the facility will not handle putrescible material other than that as outlined in 3-2. FAA will use this information to determine if the facility will be a hazard to aviation.

**4-3. NOTIFYING FAA ABOUT OTHER WILDLIFE ATTRACTANTS.** While U. S. EPA regulations require landfill owners to provide notification, no similar regulations require notifying FAA about changes in other land use practices that can create hazardous wildlife attractants. Although it is not required by regulation, FAA requests those proposing land use changes such as those discussed in 2-3, 2-4, and 2-5 to provide similar notice to the FAA as early in the development process as possible. Airport operators that become aware of such proposed development in the vicinity of their airports should also notify the FAA. The notification process gives the FAA an opportunity to evaluate the effect of a particular land use change on aviation safety.

The land use operator or project proponent may use FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, or other suitable documents to notify the appropriate FAA Regional Airports Division Office.

It is helpful if the notification includes a 15-minute quadrangle map of the area identifying the location of the proposed activity. The land use operator or project proponent should also forward specific details of the proposed land use change or operational change or expansion. In the case of solid waste landfills, the information should include the type of waste to be handled, how the waste will be processed, and final disposal methods.

#### 4-5. FAA REVIEW OF PROPOSED LAND USE CHANGES.

**a.** The FAA discourages the development of facilities discussed in section 2 that will be located within the 5,000/10,000-foot criteria in 1-3.

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b. For projects which are located outside the 5,000/10,000-foot criteria, but within 5 statute miles of the airport's aircraft movement areas, loading ramps, or aircraft parking areas, FAA may review development plans, proposed land use changes, operational changes, or wetland mitigation plans to determine if such changes present potential wildlife hazards to aircraft operations. Sensitive airport areas will be identified as those that lie under or next to approach or departure airspace. This brief examination should be sufficient to determine if further investigation is warranted.

c. Where further study has been conducted by a wildlife damage management biologist to evaluate a site's compatibility with airport operations, the FAA will use the study results to make its determination.

d. FAA will discourage the development of any excepted sites (see Section 3) within the criteria specified in 1-3 if a study shows that the area supports hazardous wildlife species.

**4-6. AIRPORT OPERATORS.** Airport operators should be aware of proposed land use changes, or modification of existing land uses, that could create hazardous wildlife attractants within the separations identified in the siting criteria in 1-3. Particular attention should be given to proposed land uses involving creation or expansion of waste water treatment facilities, development of wetland mitigation sites, or development or expansion of dredge spoil containment areas.

a. **AIP-funded airports.** FAA recommends that operators of AIP-funded airports, to the extent practicable, oppose off-airport land use changes or practices (within the separations identified in the siting criteria in 1-3) that may attract hazardous wildlife. Failure to do so could place the airport operator or sponsor in noncompliance with applicable grant assurances.

FAA recommends against the placement of airport development projects pertaining to aircraft movement in the vicinity of hazardous wildlife attractants. Airport operators, sponsors, and planners should identify wildlife attractants and any associated wildlife hazards during any planning process for new airport development projects.

b. **Additional coordination.** If, after the initial review by FAA, questions remain about the existence of a wildlife hazard near an airport, the airport operator or sponsor should consult a wildlife damage management biologist. Such questions may be triggered by a history of wildlife strikes at the airport or the proximity of the airport to a wildlife refuge, body of water, or similar feature known to attract wildlife.

c. **Specialized assistance.** If the services of a wildlife damage management biologist are required, FAA recommends that land use developers or the airport operator contact the appropriate state director of the United States Department of Agriculture/Animal Damage Control (USDA/ADC), or a consultant specializing in wildlife damage management. Telephone numbers for the respective USDA/ADC state offices may be obtained by contacting USDA/ADC's Operational Support Staff, 4700 River Road, Unit 87, Riverdale, MD, 20737-1234, Telephone (301) 734-7921, Fax (301) 734-5157. The ADC biologist or consultant should be requested to identify and quantify wildlife common to the area and evaluate the potential wildlife hazards.

d. **Notifying airmen.** If an existing land use practice creates a wildlife hazard, and the land use practice or wildlife hazard cannot be immediately eliminated, the airport operator should issue a Notice to Airmen (NOTAM) and encourage the land owner or manager to take steps to control the wildlife hazard and minimize further attraction.

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AC 150/5200-33  
Appendix 1

## APPENDIX 1. DEFINITIONS OF TERMS USED IN THIS ADVISORY CIRCULAR.

**1. GENERAL.** This appendix provides definitions of terms used throughout this AC.

**a. Aircraft movement area.** The runways, taxiways, and other areas of an airport which are used for taxiing or hover taxiing, air taxiing, takeoff, and landing of aircraft exclusive of loading ramps and aircraft parking areas.

**b. Airport operator.** The operator (private or public) or sponsor of a public use airport.

**c. Approach or departure airspace.** The airspace, within 5 statute miles of an airport, through which aircraft move during landing or takeoff.

**d. Concurrent use.** Aeronautical property used for compatible non-aviation purposes while at the same time serving the primary purpose for which it was acquired; and the use is clearly beneficial to the airport. The concurrent use should generate revenue to be used for airport purposes (see Order 5190.6A, *Airport Compliance Requirements*, sect. 5h).

**e. Fly ash.** The fine, sand-like residue resulting from the complete incineration of an organic fuel source. Fly ash typically results from the combustion of coal or waste used to operate a power generating plant.

**f. Hazardous wildlife.** Wildlife species that are commonly associated with wildlife-aircraft strike problems, are capable of causing structural damage to airport facilities, or act as attractants to other wildlife that pose a wildlife-aircraft strike hazard.

**g. Piston-use airport.** Any airport that would primarily serve FIXED-WING, piston-powered aircraft. Incidental use of the airport by turbine-powered, FIXED-WING aircraft would not affect this designation. However, such aircraft should not be based at the airport.

**h. Public-use airport.** Any publicly owned airport or a privately-owned airport used or intended to be used for public purposes.

**i. Putrescible material.** Rotting organic material.

**j. Putrescible-waste disposal operation.** Landfills, garbage dumps, underwater waste discharges, or similar facilities where activities include processing, burying, storing, or otherwise disposing of putrescible material, trash, and refuse.

**k. Runway protection zone (RPZ).** An area off the runway end to enhance the protection of people and property on the ground (see AC 150/5300-13). The dimensions of this zone vary with the design aircraft, type of operation, and visibility minimum.

**l. Sewage sludge.** The de-watered effluent resulting from secondary or tertiary treatment of municipal sewage and/or industrial wastes, including sewage sludge as referenced in U.S. EPA's *Effluent Guidelines and Standards*, 40 C.F.R. Part 401.

**m. Shoulder.** An area adjacent to the edge of paved runways, taxiways, or aprons providing a transition between the pavement and the adjacent surface, support for aircraft running off the pavement, enhanced drainage, and blast protection (see AC 150/5300-13).

**n. Turbine-powered aircraft.** Aircraft powered by turbine engines including turbojets and turboprops but excluding turbo-shaft rotary-wing aircraft.

**o. Turbine-use airport.** Any airport that ROUTINELY serves FIXED-WING turbine-powered aircraft.

**p. Wastewater treatment facility.** Any devices and/or systems used to store, treat, recycle, or reclaim municipal sewage or liquid industrial wastes, including Publicly Owned Treatment Works (POTW), as defined by Section 212 of the Federal Water Pollution Control Act (P.L. 92-500) as amended by the Clean Water Act of 1977 (P.L. 95-576) and the Water Quality Act of 1987 (P.L. 100-4). This definition includes any pretreatment involving the reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a POTW. (See 40 C.F. R. Section 403.3 (o), (p), & (q)).

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Appendix 1

q. **Wildlife.** Any wild animal, including without limitation any wild mammal, bird, reptile, fish, amphibian, mollusk, crustacean, arthropod, coelenterate, or other invertebrate, including any part, product, egg, or offspring thereof (50 CFR 10.12, *Taking, Possession, Transportation, Sale, Purchase, Barter, Exportation, and Importation of Wildlife and Plants*). As used in this AC, WILDLIFE includes feral animals and domestic animals while out of the control of their owners (14 CFR 139.3, *Certification and Operations: Land Airports Serving CAB-Certificated Scheduled Air Carriers Operating Large Aircraft (Other Than Helicopters)*).

r. **Wildlife attractants.** Any human-made structure, land use practice, or human-made or natural geographic feature, that can attract or sustain hazardous wildlife within the landing or departure airspace, aircraft movement area, loading ramps, or aircraft parking areas of an airport. These attractants can include but are not limited to architectural features, landscaping, waste disposal sites, wastewater treatment facilities, agricultural or aquacultural activities, surface mining, or wetlands.

s. **Wildlife hazard.** A potential for a damaging aircraft collision with wildlife on or near an airport (14 CFR 139.3).

2. **RESERVED.**

**Michigan Department of Transportation Airports Division, January 9, 1999**

1. None of the noted airports is adversely impacted by the Preferred Alternative.
2. Alternatives P and P1r have been eliminated from further study.
3. Comment acknowledged. No response required.
4. Comment acknowledged. No response required. Receipt of Advisory Circular acknowledged.



MICHIGAN DEPARTMENT OF STATE  
Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

STATE HISTORIC PRESERVATION OFFICE  
Michigan Historical Center  
717 West Allegan Street  
Lansing, Michigan 48918-1800

February 13, 1997

MARGARET BARONDESS  
STAFF ARCHAEOLOGIST ENVIRONMENTAL SECTION  
BUREAU OF TRANSPORTATION PLANNING  
MICHIGAN DEPARTMENT OF TRANSPORTATION  
PO BOX 30050  
LANSING MI 48909

RE: ER-940543 US-31, Holland to Grand Haven, Ottawa, Allegan, and Muskegon Counties  
(MDOT)

Dear Ms. Baroness:

We have reviewed your letter regarding the status of the above referenced project. The proposed research plan appears to be adequate for the project. We concur that the following properties do not appear to be eligible for listing in the national register: West Olive, 15704 Winans, 12721 M-104, and Nortonville Historic District.

Since the project has shifted away from 10831 Cleveland and the Ferrysburg Historic District, we concur that no further work is necessary for these properties.

It is the opinion of the State Historic Preservation Officer that the Boer Farm does appear to meet the criteria for listing in the National Register of Historic Places. Every attempt should be made to avoid this property.

If you have any questions, please contact the Environmental Review Coordinator at (517) 335-2721. Thank you for this opportunity to review and comment.

Sincerely,

Kathryn B. Eckert  
State Historic Preservation Officer

KBE:KMK

1

2

3

**State Historic Preservation Office (SHPO), February 13, 1997**

1. Comment acknowledged, no response required.
2. Comment acknowledged, no response required.
3. Direct impacts to this property were avoided by the Preferred Alternative.



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
**DEPARTMENT OF TRANSPORTATION**  
LANSING

KIRK T. STEUDLE  
DIRECTOR

January 10, 2008

Ms. Martha MacFarlane-Faes  
Environmental Review Coordinator  
Michigan State Historic Preservation Office  
Michigan Historical Center  
PO Box 30740  
702 W. Kalamazoo  
Lansing, Michigan 48909-8240

Dear Ms. MacFarlane-Faes:

US-31 Final Environmental Impact Statement  
Holland, Grand Haven, Robinson and Crockery Townships and the  
City of Grand Haven, Ottawa County  
Original ER-940543

The purpose of this letter is to request State Historic Preservation Office (SHPO) concurrence with a no historic properties affected determination on above-ground historic resources for the proposed US-31 Holland to Grand Haven project. Additionally, we are seeking SHPO approval for the archaeological resources research plan which includes a no adverse effect determination for archaeological resources for this undertaking.

**Project History and Above-ground Historic Resources**

The Michigan Department of Transportation (MDOT) completed a Draft Environmental Impact Statement (DEIS) to increase the capacity of US-31 between I-196 near Holland and I-96 in Muskegon County. The DEIS was completed in 1998. Several above-ground cultural resources surveys were completed during this time frame and all were accepted by the SHPO. A total of 3 National Register-eligible properties were identified by the surveys including the Boer Farm in Zeeland Township, the Ottawa Station School in Olive Township, and the Southside Historic District in the City of Grand Haven (see enclosed "Project Study Area" map).

Now MDOT is in the process of completing the Final Environmental Impact Statement (FEIS) for a drastically reduced scope of work. No portion of the proposed improvements is planned within either Zeeland or Olive Townships, which means the Boer Farm and the Ottawa Station School are outside the Area of Potential Effect for this project.

MURRAY D. VAN WAGONER BUILDING • P.O. BOX 30050 • LANSING, MICHIGAN 48909  
[www.michigan.gov](http://www.michigan.gov) • (517) 373-2099

LH-LAN-0 (01/03)

Ms. Martha MacFarlane-Faes  
Page 2  
January 10, 2008

### **Project Description and Impacts**

Due to the environmental impacts discussed in the DEIS, budget constraints, and public input, the new project includes a new route between M-45 and I-96 crossing the Grand River, improving portions of existing US-31 in the Holland area, and improving portions of existing US-31 in Grand Haven (see enclosed "Project Study Area" map). The Southside Historic District in the City of Grand Haven remains in the project area. However, the improvements planned for the segment of US-31 near the Southside District will have no impact on the District. As the enclosed aerials demonstrate, the curb will either move away from the District or remain in the same location (see enclosed aerial photographs). No radius improvements will be necessary within the District boundaries, and the number of travel lanes (two) will remain the same. As a result, no above-ground historic properties will be affected by the proposed improvements.

### **Archaeological Resources**

During the summer of 2001, the Recommended Alternative was surveyed by Commonwealth Cultural Resources Group, Inc. (CCRG) and discussed in their report titled US-31 Location Design Study Holland to Grand Haven Summer 2001 Archaeological Investigations Along the Recommended Alternative in Ottawa County, Michigan, dated October 2001.

In this report, CCRG states that within the new areas surveyed, seven sites were identified (200T317 thru 200T323), but all were determined "not eligible" for the National Register of Historic Places (see enclosed "2001 Survey Corridor" map). Still, it was conjectured that the near proximity and archaeological potential of two other known sites 200T3 (an eligible site) and 200T283, both of which are located directly east of the proposed corridor, are such that further survey of the properties was recommended (CCRG Report 2001, 4.0 Conclusions, pages 4-1 & 4.2, and Figure 3.0-4). Unfortunately, the property owners denied access which delayed MDOT's ability to further survey these parcels as was recommended. Consequently, it is not presently known if there are any sites present in these untested areas.

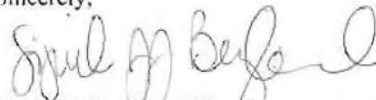
In consultation with the SHPO's Office in 2001 and again in 2008, it was determined that once MDOT purchased these properties, the surveys would be completed and any eligible archaeological sites located would be mitigated through data recovery since any such sites would be important for the information they may yield but not for preservation in place. If any eligible archaeological sites are discovered, MDOT shall consult with the SHPO and Office of the State Archaeologist, to develop and execute an acceptable data recovery mitigation plan.

Ms. Martha MacFarlane-Faes  
Page 3  
January 10, 2008

**Conclusion**

If you concur with this assessment, please sign the concurrence line below. This letter will be included as an attachment in the FEIS following receipt of the executed concurrence from your office. Please feel free to contact me at 335-4229 regarding above-ground historic resources or Dr. David Ruggles at 335-2637 regarding archaeological resources, if you have any questions or concerns. Thank you.

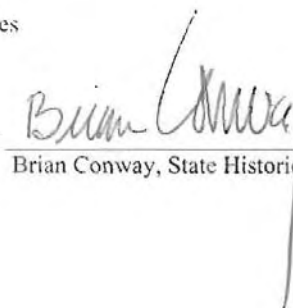
Sincerely,



Sigrid JJ Bergland, Historian  
Environmental Section  
Project Planning Division

Enclosures

I concur:



Brian Conway, State Historic Preservation Office

Date: 3/14/08

**State Historic Preservation Office (SHPO), January 10, 2008**

Comments acknowledged.

## KEWEENAW BAY INDIAN COMMUNITY

2007 TRIBAL COUNCIL

SUSAN J. LAFERNIER, President  
WARREN C. SWARTZ, JR., Vice-President  
TONI J. MINTON, Secretary  
GARY F. LOONSFOOT, SR., Asst. Secretary  
JENNIFER MISEGAN, Treasurer

Keweenaw Bay Tribal Center  
16429 Beartown Road  
Baraga, Michigan 49908  
Phone (906) 353-6623  
Fax (906) 353-7540

October 16, 2007

DOREEN G. BLAKER  
JERRY LEE CURTIS  
LARRY J. DENOMIE III  
WILLIAM E. EMERY  
MICHAEL F. LAFERNIER, SR.  
ELIZABETH "CHIZ" MATTHEWS  
ELIZABETH D. MAYO

Jennifer Reidsma, Transportation Planner  
URS Corporation  
3950 Sparks Drive, SE  
Grand Rapids, MI 49546

Re: **Cultural Resources Review: US-31 Environmental Impact Statement**  
**T5N R15W Sections 4,5,8,9,16,21 (Holland Township) T8N R16W Section 21, 28 (City of Grand Haven) T7N T8N R15W Sections 4,9, 16, 21, 28, 33 (Robinson Township) and T8N R15W Sections (14, 15, 16, 21, 22, 23, 28, 33 (Crockery Township)-Holland Township, City of Grand Haven, Robinson Township and Crockery Township, Ottawa County, Michigan**

Dear Ms. Reidsma:

The Keweenaw Bay Indian Community Tribal Historic Preservation Office (KBIC THPO) received your requests for comments or interest concerning the National Historic Preservation Act, Section 106 request for review and comment to the effect on historic and cultural sites within your proposed project area. The KBIC Tribal Historic Preservation Office has no interests regarding religious or cultural sites documented at this time in the proposed project areas.

It is the KBIC THPO's belief that many prehistoric sites and Indian historic sites within historic home territories have not yet been identified or documented. KBIC is among the many Tribes initiating the process of assisting in this endeavor. KBIC urges you to consult other Indian Tribes in your immediate area that may have documented interests in your project site, if you have not already done so.

If the scope of work changes in any way, or if artifacts or human remains are discovered, please notify the KBIC THPO immediately so we can assist in making an appropriate determination.

Please forward any future request for review of historic and cultural properties according to the National Historic Preservation Act Section 106 to Summer Sky Cohen, Officer, Tribal Historic Preservation Office or through email at [scohen@kbic-nsn.gov](mailto:scohen@kbic-nsn.gov) and keep us informed of future projects as we continue our efforts to identify and document historic, archaeological and traditional cultural sites in the area.

Sincerely,



Summer Sky Cohen, Officer  
Tribal Historic Preservation Office  
16429 Beartown Road  
Baraga, Michigan 49908  
906-353-6272

LAKE SUPERIOR BAND OF CHIPPEWA INDIANS

**Keweenaw Bay Indian Community, October 16, 2007**

Comment Acknowledged. If proposed project area changes, or any artifacts or human remains are discovered, the Keweenaw Bay Community will be notified.

*Little Traverse Bay Bands of Odawa Indians  
Archives, Records and Cultural Preservation Department  
7500 Odawa Circle, Harbor Springs, Michigan 49740  
(231) 242-1450 phone (231) 242-1455 fax*

September 19, 2007

Ms. Jennifer Reidsma, Transportation Planner/GIS Specialist  
URS Corporation  
3950 Sparks Drive, SE  
Grand Rapids, MI 49546

Re: US-31 Environmental Impact Statement in Holland Township, City of  
Grand Haven, Robinson Township and Crockery Township, Ottawa  
County, Michigan


Dear Ms. Sprague:

At this time, we do not have any information concerning the presence of any Indian Traditional Cultural Properties, Sacred Sites, or Other Significant Properties in the designated area of the proposed construction sites in the City of Grand Haven, Holland, Robinson and Crockery Townships, or Ottawa County, MI. This is not to say that such a site does not exist, just this office does not have any available information indicating that a site is present using our current documentation of the area.

However, this office would be more than willing to assist, if in the future or during construction, there is an inadvertent discovery of Native American human remains or burial objects. I have enclosed a Site Reference Form that our office uses in the event of a discovery in order to speed the process. Please contact me if you have any further questions or requests. I can be reached at (231-242-1453).

We thank you for including our tribe in your plans.

Miigwetch (thank you)



Winnay Wemigwase  
Director  
Archives/Records and Cultural Preservation  
Little Traverse Bay Band of Odawa Indians

## Site Reference Form



Date of Discovery: \_\_\_\_\_ Today's Date: \_\_\_\_\_

Owner/Site Representative: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Location: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

### Site Information:

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Location and Circumstance of Discovery: \_\_\_\_\_ Time of Discovery: \_\_\_\_\_ am/pm

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Contacts Made:

Law Enforcement Department: \_\_\_\_\_

Investigating Officer: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Date of police report: \_\_\_\_\_ Time on report: \_\_\_\_\_ am/pm

Other contacts (w/phone #): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Native American Burial (please circle) yes \_\_\_\_\_ no \_\_\_\_\_

Confirmed by: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Release Status: \_\_\_\_\_

Little Traverse Bay Bands of Odawa Indians Tribal NAGPRA Contacts:

Leonard J. Mitchell

Cultural Preservation Coordinator/NAGPRA Tech.

(231) 242-1451ph / jmitchell@ltbbodawa-nsn.gov

Winnay Wemigwase

Director, Archives/Records & Cultural Preservation

(231) 242-1453ph / wwemigwase@ltbbodawa-nsn.gov

7500 Odawa Circle, Harbor Springs, Michigan 49740

**Little Traverse Bay Band of Odawa Indians, September 19, 2007**

Comment Acknowledged. If proposed project area changes, or if an inadvertent discovery of Native American human remains, or burial objects are discovered, the Little Traverse Bay Band of Odawa Indians will be notified.



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Michigan Division

315 W. Allegan, Room 201  
Lansing, Michigan 48933

March 18, 2009

Mr. Andy Irwin  
Manager, Project Planning Section (B340)  
Michigan Department of Transportation  
Lansing, Michigan

Dear Mr. Irwin:

Concurrence in Traffic Analysis for  
I-96 at M-231/M-104 and 112<sup>th</sup> Avenue Interchanges &  
M-231 Corridor Rights-of-Way Preservation

The Federal Highway Administration (FHWA) is in receipt of your letters dated February 24 and March 12, 2009, requesting FHWA's recommendations regarding the proposed Interstate access modification at I-96 and preservation of additional rights-of-way along the M-231 corridor which are all part of the Preferred Alternative with US-31 Holland to Grand Haven Project which is currently in the last stages of completing the Final Environmental Impact Statement. The Interstate Access Justification Report (IAJR) is planned to be completed after the Record of Decision (ROD).

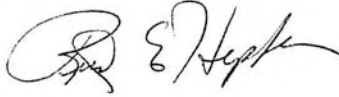
FHWA concurs with the traffic analysis for the I-96 at M-231/M-104 and 112<sup>th</sup> Avenue interchanges. While the proposed concept at I-96 at M-231/M-104 interchange is not a standard configuration, it does operate at an acceptable Level of Service in the future 2030 year and provides for all the movements. The interchange proposed at I-96 and 112<sup>th</sup> Avenue is a standard diamond configuration and operates at an acceptable Level of Service for all movements. This concurrence does not constitute approval of the proposed Interstate modification at I-96.

In addition, FHWA concurs that the projected traffic for the proposed M-231 corridor between M-45 and M-104 is approaching capacity in the year 2030 based on the HCS analysis provided. Therefore, FHWA concurs that it would be within the public's interest to preserve additional rights-of-way for future expansion to a four lane facility as part of the Preferred Alternative.

ENCLOSURE  
**AMERICAN  
ECONOMY**

Please feel free to call me at (517) 702-1847, for any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruth E. Hepfer". The signature is fluid and cursive, with the first name "Ruth" being more prominent.

Ruth. E. Hepfer  
Area Engineer

For: James J. Steele  
Division Administrator

cc: Dennis Kent, MDOT Grand Region  
Vicki Weerstra, MDOT Grand Region  
Mike O'Malley, MDOT (B340)  
Dave Calabrese, FHWA  
Dave Williams, FHWA  
Profile No. P-24152

**Federal Highway Administration (FHWA), March 18, 2009**  
Comment Acknowledged.

## C.2 LOCAL AGENCY COMMENTS AND RESPONSES



**Macatawa Area  
Coordinating Council**

A Cooperative Effort Among Units of Government

**Policy Board**

Richard Vander Broek, Chair  
Leroy Dell, Vice-Chair  
Ann Query  
Edward Berghorst  
Gene Berghorst  
Jerome Bush  
Luciano Hernandez  
Al Hoekman  
Lester Hoogland  
Vern Johnson  
Del McBurnies  
Al McGeehan  
Phil Quade  
Stu Visser  
John Vogelzang

**Committee Chairs**

**Land Use/Environmental:**  
Richard Vander Broek

**Housing/Quality of Life:**  
Ann Query

**Transportation:**  
Leroy Dell

July 15, 1994

Michael J. Jaeger, P.E.  
Greiner,  
3950 Sparks Drive, S.E.  
Grand Rapids, MI 49546

Dear Mike:

Following our telephone conversation, I am writing on behalf of the Macatawa Area Coordinating Council's Technical Committee, to request that you meet with us to review the more detailed options now under consideration for US -31 upgrading or relocation. I understand that it would be best for all concerned if we have such a presentation after you have completed the scoping process and, therefore, am requesting that you meet with us on September 12 at 10:00 a.m. (location to be determined).

It would be most helpful for all of our member units of government to receive such a presentation through the MACC, our metropolitan planning organization rather than individual presentations to each local unit of government. We are most interested in understanding the options, and not so much ready to voice our opinions.

Your assistance in presenting the most current information to all seven units of government that comprise the MACC will be very helpful in distributing that information to the decision-makers and the citizens of all of our area.

Thanks so much for your consideration. I look forward to hearing about the progress of this very exciting, and far-reaching, project.

Sincerely,

Sue Higgins  
Executive Director

cc: Tech Committee

325 North River Holland, Michigan 49424 Phone: (616) 395-2688 - Fax: (616) 396-3774

**Macatawa Area Coordinating Council (MACC), July 15, 1994**

1. Comment acknowledged. Since the DEIS was issued, MDOT has met with the MACC on several occasions to update and keep them involved in the EIS process.

In a letter dated January 25, 1999, the Macatawa Area Coordinating Council Policy Committee conveyed that the committee had voted unanimously to support the Alternative F/J1. The Preferred Alternative includes critical segments of F/J1. The MACC supports the current Preferred Alternative and have approved of its inclusion in the LRTP.

January 25, 1999

Page 2

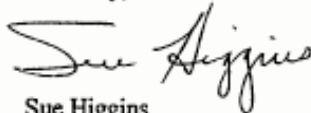
These issues are particularly important in such a rapidly growing area as this part of West Michigan.

We appreciate the expertise that the Michigan Department of Transportation, their subcontractors (URS Greiner), and the Federal Highway Administration have brought to this Major Investment Study. We are particularly pleased with the unified consensus that has resulted from this extensive study. Not only are all of the members of the MACC in agreement, but the Mayors of Holland and Grand Haven also delivered to us today a joint letter of support for our recommendations, helping to unify the northern and southern parts of the study area.

In addition, the Boards of Directors of the Holland Area Chamber of Commerce and the Zeeland Chamber of Commerce, representing our business community, also have issued resolutions in support of these recommendations. They recognize that the businesses directly impacted by the current US 31, as well as the businesses throughout our entire area, will greatly benefit from the implementation of these recommendations.

While we realize that there are many demands upon available resources for road construction throughout the State of Michigan, we urge you to support the early implementation of the improvements that have been unanimously agreed upon for the future of US 31. The strong economy of West Michigan needs the support of these significant improvements to our infrastructure to best sustain the high level of growth that we are experiencing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sue Higgins".

Sue Higgins  
Executive Director

Encl.



**Macatawa Area  
Coordinating Council**

*A Cooperative Effort Among Units of Government*

**Policy Board**  
\* Robert Den Harder  
\* Randolph Bolesau  
\* James Brooks  
\* Chris Bymes  
\* Leroy Dett  
\* Edward Berghorst  
\* Gene Berghorst  
\* Jerome Bush  
\* John Craven  
\* Terry Eldred  
\* Luciano Hernandez  
\* Alvin Hostman  
\* Lester Hoogland  
\* Albert McGeehan  
\* Terry Menhuis  
\* William Sidal  
\* Stuart Visser

**\* Executive Committee**

**RESOLUTION**

Resolution of the Macatawa Area Coordinating Council (MACC) Policy Committee regarding future improvements to the US 31 corridor.

**WHEREAS**, the MACC is the designated Metropolitan Planning Organization for the Holland/Zeeland urbanized area; and

**WHEREAS**, the MACC is responsible for overseeing the 3-C Urban Transportation Planning Process and making related decisions, in the Holland/Zeeland urbanized area; and

**WHEREAS**, the MACC, in conjunction with MDOT and FHWA officials, initiated a Major Investment Study (MIS) to analyze future improvements to the US 31 corridor in the MACC area; and

**WHEREAS**, through the work of the MACC's US 31 ad-hoc Committee, Technical Committee and Policy Committee assisted MDOT officials in analyzing alternatives contained in the MIS; and

**WHEREAS**, members of the committees noted above desired to take a comprehensive approach to the recommendation of improvements to US 31 with the goals that any improvements provide congestion relief, improve safety, and minimize impacts on rural and urban areas; and

**WHEREAS**, the recommendations proposed by the MACC address short term and anticipated long term problems in the US 31 corridor, effectively address congestion and safety issues, minimize impacts on rural and urban areas, and should be considered concurrently, and

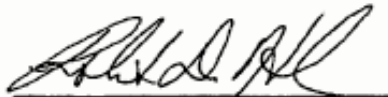
**WHEREAS**, the attached recommendations urge MDOT to immediately begin implementing short term solutions such as Transportation System Management and Intelligent Transportation System improvements as well as the various transit activities as detailed in the US 31 Draft Environmental Impact Statement; and

**WHEREAS**, the attached recommendations call for more permanent solutions which include a narrow median boulevard on the existing alignment and limited access improvements, following the F/JI alignment, consisting of a bypass around the east side of Zeeland and a freeway along 120th Avenue with the recognition that the boulevard will most likely occur in the near term and the bypass in the future as the need arises; and

**WHEREAS**, it is recognized that implementation of these recommended improvements could be significantly hampered if right-of-way is not acquired in a timely manner and MDOT is urged to actively pursue the right-of-way necessary to implement the recommended improvements; and

WHEREAS, it is also recognized that proper land use controls are needed to manage growth not only to preserve the corridors necessary to implement the recommended improvements but also help ensure the preservation of agriculture and natural areas and that the Counties of Ottawa and Allegan can play a vital role in assisting local units of government in developing such controls.

NOW, THEREFORE, BE IT RESOLVED that the MACC Policy Committee adopts the recommended improvements, attached hereto, as the preferred course of action to address the travel demands in the US 31 corridor.



Robert Den Herder  
MACC Policy Committee Chairperson

1-25-99  
Date

**Recommended Future Improvements**  
**to the**  
**US 31 Corridor**

*Macatawa Area Coordinating Council*

January 25, 1999

### Background

US-31 from Interstate 196 to Interstate 96 has been under study for several years. The purpose of the study is to reduce traffic congestion and improve safety on and in the vicinity of US-31. A 1990 Michigan Department of Transportation (MDOT) report which provided a preliminary assessment of the conditions on the corridor recommended further study of several alternatives on the existing US-31 alignment. It also identified the possibility of an alternate by-pass alignment.

The current US-31 Location Design Study was initiated in 1993. In 1995, following the creation of the Macatawa Area Coordinating Council (MACC) as the Metropolitan Planning Organization for the Holland-Zeeland Area, a Major Investment Study (MIS) was initiated for that portion of the study area south of New Holland Street. A MIS is required when improvements to a transportation facility result in significant costs and have a substantial impact on the metropolitan transportation network in terms of traffic and capacity. As part of the MIS process, the MACC worked with MDOT to develop the data necessary for traffic modeling, reviewed traffic projections, and analyzed alternatives. It also assisted in reducing the number of alternatives that were carried forward as practical alternatives and further studied as the Draft Environmental Impact Statement (DEIS) was developed.

The DEIS, released November 1998, was prepared by MDOT as required by the National Environmental Policy Act (NEPA). The DEIS describes the practical alternatives being considered within the study area and analyzes the social, economic, and environmental impacts of each alternative. The DEIS presents the results of a combined NEPA/MIS planning study. NEPA focuses on environmental analyses of alternatives, whereas MIS procedures call for a comprehensive investigation of investment options.

The DEIS has been studied by MACC members, staff, and the MACC's US-31 ad-hoc Committee, which was established by the MACC Policy Chair, in 1995 when the MIS was initiated. The MACC's US 31 ad-hoc Committee is comprised of the following individuals:

Bob Den Herder	MACC Policy Chair
Bill Nelson	Allegan County Road Commission
Tom Palarz	Ottawa County Road Commission
Bill Driesenga	Holland Township
Gord Ellens	Zeeland Township
Dave Langhorst	City of Zeeland
Soren Wolff	City of Holland

Meetings of the US-31 ad-hoc Committee were held to discuss research conducted by MACC and MDOT staff, consider comments regarding the US 31 study made by the MACC's Technical and Policy Committees as well as the general public, and, most recently, the analyses contained in the DEIS.

As a result of these efforts based on a desire to provide congestion relief and improve safety on and in the vicinity of US-31, while minimizing impacts on rural and urban areas, recommendations for future improvements to US-31 have been developed and are described below.

### **Recommendations for Future Improvements to US-31**

This document is intended to provide recommendations about the future improvements desired by the MACC for US-31. The MACC, recognizing that improvements to US-31 will be the largest transportation project this area will experience for many years to come, has attempted to take both a short term and long term approach to its recommendations. Therefore, these recommendations are viewed as solutions to both short-term and anticipated long-term problems. The recommendations will most effectively address the congestion and safety issues that we face today, as well as minimize the impacts on rural and urban areas, if they are implemented concurrently. Rapid growth in the entire study area requires an early implementation of all components of this recommendation. It is particularly important to note that future development controls, including acquisition of needed right-of-way, occur as soon as possible and that they are viewed as significant components of each of the recommendations.

Please note that these recommendations contain references to information contained in the DEIS. A map which graphically represents this phased recommendation is included at the end of this document.

### **Right of Way and Future Development Controls**

The need for improvements to US-31 is due to the growth and development experienced within the study area and this growth is expected to continue. This development, if not managed properly, has the potential of hampering the implementation of some of the recommendations. Furthermore, managed growth will help ensure the preservation of agricultural land and natural areas and allow for needed improvements to supporting infrastructure. The MACC calls upon Ottawa and Allegan Counties, along with each local governmental unit, to take measures to create or amend their master plans to manage development and growth in such a way as to allow the implementation of these needed improvements while minimizing possible negative impacts. It would be helpful and appropriate for Allegan and Ottawa Counties to provide technical and financial assistance to individual units of government in reviewing and amending master plans and zoning regulations in order to take a significantly different approach to managing future growth. Negative impacts are more likely to occur if proper controls are not instituted.

The Home Builders Association and individual developers and builders could be helpful in spearheading, with the support of local units of government, development strategies such as clustering as a means to mitigate impacts of infrastructure improvements and preserve open spaces. Density bonuses could be utilized and other techniques implemented to provide landscaping and other buffers from the roadways.

The MDOT should actively seek to acquire necessary right-of-way by purchasing parcels beginning as soon as the specific alignments can be designed in order to preserve the corridor and protect it from future development which would impede construction of the recommended infrastructure improvements.

Ottawa County should institute a proactive program to provide assistance to individual units of government, as well as property owners and developers, to encourage growth that is consistent with these recommendations and which minimize impacts of the infrastructure on both urban and rural areas. Such a program might appropriately be referred to as "Sensible Growth" and should utilize lessons learned from other areas (e.g., Peninsula Township in the Traverse City area) while being developed to specifically meet the unique needs of this study area and the long-term growth philosophies of each affected unit of government.

### **Holland-Zeeland Bypass (F/J1)**

The preliminary engineering of a freeway bypass following the F/J1 alignment from I-196 to 120<sup>th</sup> Avenue is recommended. The specific alignment of this component of the recommendations should be identified as soon as possible, and development controls should be implemented, in order to preserve the corridor and protect it from future development that would impede the actual construction of the bypass. Construction is viewed as a possible future need to occur when funding becomes available. Additional overpasses should be included in order to provide good connectivity of the local roadway network. Interchange types and right-of-way widths should be examined to safely minimize impacts to agricultural areas and manage development.

Comments: Current and future development in the northern portion of the MACC and eastern Ottawa County, and the anticipated travel demand from that development, requires a long term transportation improvement. The bypass option would allow for a roadway that would facilitate goods and people movement, in primarily an east/west direction, between the Holland/Zeeland and Grand Rapids metropolitan areas, a traffic flow that continues to increase. At the same time, it would provide a safe and convenient route, along with the freeway option noted below, for through north/south traffic along a freeway system that is continuously connected from the Indiana state line to the areas north of the study area. To preserve community cohesion, additional overpasses (e.g. Ransom Street) should be included. Construction of this segment, along with the F/J1 freeway recommendation, closes the freeway gap in US-31. Conducting preliminary engineering to delineate the alignment of this improvement can greatly assist in preservation of the corridor and acquisition of right-of-way as it becomes available. Appropriate right-of-way should be set aside and protected, as soon as possible, in order to best implement this component of the recommendations.

1

### Transportation System Management

Immediate improvements to US-31 to relieve congestion and improve safety are needed in the short-term, regardless of what future, more permanent, improvements are constructed. The Transportation System Management (TSM) improvements contained in the DEIS are recommended (in addition to the pavement rehabilitation activities on US-31 already in MDOT's five-year plan) to be fully implemented by the year 2005. Examples of TSM improvements include:

- Increased radii at corners to improve turning movements
- Modifications to traffic signal timing and progression
- Addition and extension of auxiliary turn lanes

Comments: These low cost capital improvements are intended as short-term solutions to ease congestion and improve safety until the construction of more permanent improvements can be completed. It is understood that many of these improvements can be incorporated into other recommended improvements thereby preserving the investment. The MACC intends to immediately begin working with appropriate MDOT officials to implement these types of improvements.

2

### Intelligent Transportation Systems

The implementation of Intelligent Transportation System (ITS) activities can also assist in providing short-term relief. The DEIS identifies several ITS technologies including Advanced Traffic Management Systems (ATMS), Advanced Traveler Information Systems, and Commercial Vehicle operations. These technologies, especially demand responsive traffic controls, should be explored and implemented in conjunction with the TSM improvements.

Comments: While not as specifically defined as the TSM improvements, it is recognized that ITS improvements can also help. The MACC will work with MDOT officials to begin identifying potential ITS technologies that are appropriate for the MACC area.

3

### Transit Components

The DEIS states that further consideration should be given to the expansion and/or creation of park and ride/intermodal facilities. Several improvements for the MACC area are noted. The MACC in its Long Range Transportation Plan seeks to encourage and develop a balanced transportation system, supported by significant additional funding, that gives residents choices. The transit components should be fully explored and incorporated into these recommended improvements in order to eventually realize a coordinated and comprehensive transit service that serves the entire study area.

Comments: Likewise, in an effort to achieve a balanced transportation system, appropriate improvements are needed in conjunction with these recommendations to encourage non-motorized transportation in a safe and attractive manner throughout the study area. The proposals of the Greenway Partnership to protect and preserve open space corridors should be considered and incorporated as well.

4

### Construction of Narrow Median Boulevard (P1r)

Construction of P1r, the narrow median boulevard using direct, protected, left turns, is recommended from I-196 to New Holland Street. It is imperative that lower speed limits be implemented on this segment, in an effort to address safety concerns, and especially to reduce the severity of crashes. It is expected that many of the TSM improvements noted above can be incorporated into this improvement. Grade separated intersections should be considered for a very limited number of intersections, specifically those intersections with existing or anticipated poor levels of service. A grade separated intersection design which minimizes or eliminates the need for additional right-of-way and enhances pedestrian/nonmotorized safety should be utilized. Specific attention needs to be made to avoid increased speeds when utilizing any grade separated intersections. Additional design features that can be implemented to mitigate the potential for higher average speeds could include landscaping, pedestrian improvements, and perhaps even curbs and gutters.

Comments: The construction of a narrow median boulevard results in the minimization of business displacements and employment loss. The boulevard alternative allows for the slowing of speeds, provides direct access to US-31 at every intersection, and maintains community cohesion. The consideration of grade separated intersections recognizes the safety and capacity benefits that grade separated intersections provide. However, issues related to potential increases in average speeds need to be addressed as noted above. It is assumed that ramps will be provided at these intersections to allow all turning movements to occur thereby preserving full access to the adjoining land uses. It is understood that a specific type of interchange, the single-point interchange, may meet the requirements of this recommendation.

5

### Construction of Freeway (F/J1)

Construction of a freeway following the F/J1 alternative alignment from New Holland Street to I-96 is recommended. Additional overpasses should be included in order to provide good connectivity of the local roadway network. Interchange types and right-of-way widths should be examined to safely minimize impacts to agricultural areas and manage development.

Construction of the freeway bypass following the F/J1 alignment, delineated by the preliminary engineering activity recommended earlier in this document and based on funding and need, would be completed. In addition, on the existing US-31 alignment from New Holland to the Grand Haven City limit, the P1r improvements are recommended.

Comments: This recommendation recognizes the need for another crossing of the Grand River between Grand Haven and 68<sup>th</sup> Avenue and, along with the recommended bypass, addresses the freeway gap that exists in the US-31 corridor. It provides a direct north-south route with a logical connection to existing US 31. The recommendation calls for preserving the continuity of the local roadway network and attempts to limit the impact of the transportation system on urban sprawl by carefully examining the location of interchanges.

6

### Summary

The MACC recommends the following improvements to the US 31 Corridor. These improvements are to be viewed as occurring concurrently, the listing is not an indication of priority, and they include:

- **ROW Acquisition and Future Development Controls** – right-of-way acquisition and effectively managing development is essential in order for the timely implementation of all recommended improvements
- **Holland-Zeeland Bypass** – completion of preliminary engineering for a freeway bypass from I-196 around the east side of the City of Zeeland with a connection to the freeway at 120<sup>th</sup> Avenue
- **TSM Improvements** – implement low cost capital improvements to ease congestion until a more permanent solution is constructed
- **ITS Improvements** – implement technologies such as demand responsive traffic signals, traveler information systems, etc. as appropriate
- **Transit Components** – incorporate various transit components such as park and ride lots, intermodal facilities, etc. into other improvements as appropriate
- **Boulevard Improvements** – construction of a narrow median boulevard through the City of Holland and Holland Township
- **Freeway Improvements** – construction of a freeway north of the MACC area along the 120<sup>th</sup> Avenue corridor across the Grand River to I-96 with a freeway connector to existing US 31.
- **Holland-Zeeland Bypass** – construction of a freeway bypass from I-196 around the east side of the City of Zeeland with a connection to the freeway at 120<sup>th</sup> Avenue

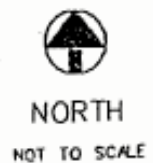
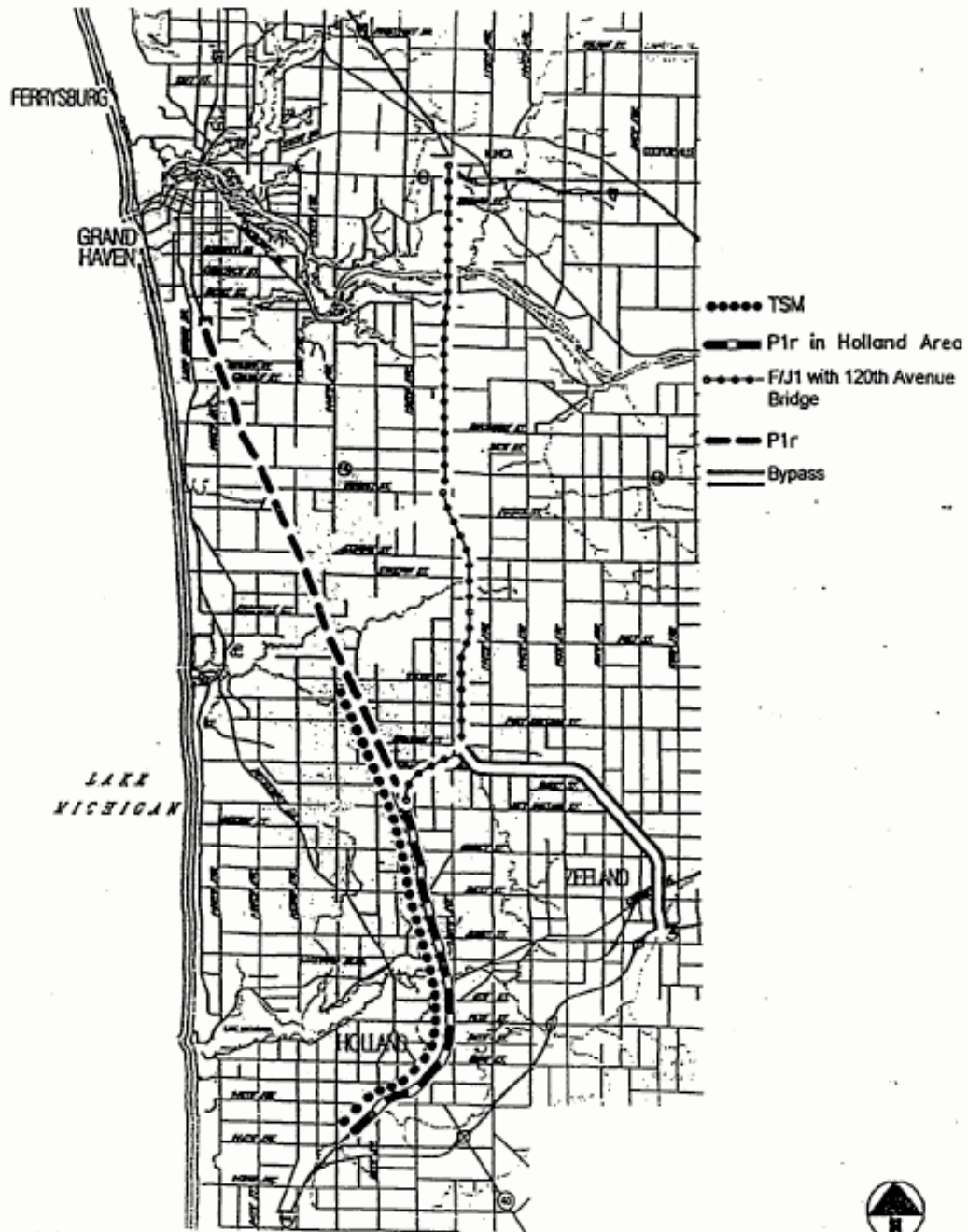
These recommended improvements to US-31 will address the traffic congestion and safety concerns on this corridor, minimize impacts on rural and urban areas, respond to the short-term and long-term transportation needs of the area, and remain consistent with the goals and objectives contained in the MACC's Long Range Transportation Plan.

### Contact Information

Questions concerning this document should be addressed to:

Sue Higgins, Executive Director or Steve Bulthuis, Planner  
Macatawa Area Coordinating Council  
400-136<sup>th</sup> Avenue, Suite 416  
Holland, MI 49424  
(616) 395-2688  
email: bulthuis@macatawa.org

# Recommended Improvements to US 31 Corridor



**Macatawa Area Coordinating Council (MACC), January 25, 1999**

1. Right-of-way acquisition generally begins after receiving the Record of Decision (ROD).
2. Many operational improvements have been made along US-31; any interim improvements should not interfere with the NEPA process.
3. See response to comment 2.
4. The current Preferred Alternative may include a non-motorized crossing over the Grand River on the M-231 bridge. A discussion of this is included in **Section 4.17**.
5. At this time no grade separations are planned for existing US-31.
6. The continuity of the local roadway network will be maintained with the current Preferred Alternative. There will be road closures at only two locations along the new M-231 and none along existing US-31. See **Section 3.5**.



WEST MICHIGAN SHORELINE  
REGIONAL DEVELOPMENT COMMISSION

December 17, 1998

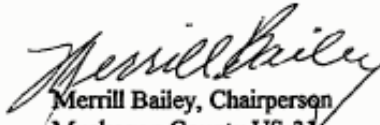
Mr. Jose A. Lopez, Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909


Dear Mr. Lopez:

Please find enclosed a document titled Muskegon Area Response to the Draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa, and Muskegon Counties. This document serves as the official position of Muskegon Area Community Leaders meeting as the Muskegon County US-31 Blue Ribbon Committee. We are submitting this as input to the comment period ending January 11, 1999.

Your consideration of our comments in this matter is greatly appreciated. If you should have any questions on this matter, please feel free to contact us.

Sincerely,

  
Merrill Bailey, Chairperson  
Muskegon County US-31  
Blue Ribbon Committee

  
Sandeep Dey, Executive Director  
West Michigan Shoreline Regional  
Development Commission

enclosure  
SD:jk

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WWW.WMSRDC.ORG

MUSKEGON, MICHIGAN 49443-0387

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**MUSKEGON AREA RESPONSE  
TO THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
FOR US-31 IN ALLEGAN, OTTAWA,  
AND MUSKEGON COUNTIES**

Prepared for  
**Muskegon Area Community Leaders meeting as the  
Muskegon County US-31 Blue Ribbon Committee**

by the  
**West Michigan Shoreline Regional Development Commission**

December 1998

## BACKGROUND

In the coming months, the Michigan Department of Transportation will be making an important decision about improvements to the US-31 Corridor in West Michigan. The decision will provide a remedy for decisions made in the past, will address traffic issues faced in the present, and will affect the communities along the lakeshore corridor far into the future. It is a monumental decision, with much more than monetary costs involved.

The Muskegon County US-31 Blue Ribbon Committee, a committee comprised of local government, community, and business leaders, has previously provided input on potential solutions regarding the US-31 issues, as transmitted to the Michigan Department of Transportation in a position paper dated April 1998. The position paper noted the importance of this corridor to the lives of Muskegon County residents and provided reasons that the corridor should be preserved and improved on its current alignment. The position provided input on short term solutions that could be taken to improve the situation, and left open the door for Muskegon County to comment on additional long-range improvements once the Draft Environmental Impact Statement on the US-31 issue was completed.

On November 5, the Draft Environmental Impact Statement (DEIS) was made available for review, and a public comment period was begun. The Muskegon County US-31 Blue Ribbon Committee met to discuss the study and directed that a response be prepared to show the Muskegon Area's unified position on the issue. This paper is intended to serve as the Muskegon Area's response to the Draft Environmental Impact Statement, and as the Muskegon County US-31 Blue Ribbon Committee's input to the public comment process ending January 11, 1999.

## STATEMENT OF POSITION

Muskegon area leaders, meeting as the Muskegon County US-31 Blue Ribbon Committee, strongly believe, as shown by a unanimous Committee vote on the issue, that **the US-31 Corridor should remain on its current alignment, with the long term solution to the issues of the corridor being Alternative A, a freeway on the existing alignment.** Preparations should be made immediately to begin the development of Alternative A, with Transportation System Management strategies being utilized for short term improvements until Alternative A is constructed.

## SUPPORT FOR THE MUSKEGON AREA'S POSITION

The Draft Environmental Impact Statement analyzes the potential effects of numerous alternatives and leaves the tough decisions to the Michigan Department of Transportation and the communities of Allegan, Ottawa, and Muskegon Counties. The following are numerous reasons that the Muskegon County US-31 Blue Ribbon Committee believes that Alternative A should be chosen as the long term solution to the problems of the corridor.

**US-31 is the economic lifeline of the lakeshore communities. To alter the alignment of this corridor is to disturb the area's most important linkage, both in regards to transportation and economy.** As exemplified by figures in the study, US-31 is the lakeshore's primary transportation corridor, carrying far more traffic than either I-96, I-196, or any other route in the study area. This traffic illustrates the north-south linkages that have naturally developed among the lakeshore communities all along Lake Michigan, and the resulting importance of the US-31 corridor. These linkages are shown in development patterns, economic activity, and transportation characteristics. The existing corridor has served, and will continue to serve, as the primary link for transportation and economics. Any changes in the alignment of this corridor will result in a disruption of lakeshore development patterns and economies.

2

**The anticipated levels of traffic diverted to any of the proposed bypass routes is insufficient to warrant their consideration as a solution to the US-31 corridor traffic levels.** The DEIS shows that the majority of traffic will continue to utilize the current corridor in any scenario. At best, one of the alternate alignment scenarios estimates that 13,400 vehicles may utilize a bypass daily in the year 2020. This still equates to a year 2020 traffic level of 69,600 north of Grand Haven, an increase of 19% over 1997 daily traffic levels in the Grand Haven area. Traffic will get worse in the Grand Haven area without a major capacity improvement. The DEIS option that best meets this need and the intent of the US-31 study project (which, according to the DEIS, is to reduce traffic congestion and improve safety for the traveling public) is Alternative A. It accommodates the expected levels of traffic, reducing congestion in the safest manner.

3

**A limited access freeway along the current corridor provides the highest level of mobility for travelers and appropriate levels of access through interchanges and access roads.** Historically, State Highways are designed to serve a mobility purpose, with local roads and streets serving access functions. Alternative A constructs the US-31 roadway to a design that promotes mobility along the lakeshore, as should have been done years ago, and provides appropriate access roads and links to the neighboring communities to perform access functions.

4

**All of the options included in the DEIS require additional Right-of-Way and widening in the Grand Haven area. Alternative A provides the best form of roadway within the right of way to be purchased.** Arguments that US-31 in Grand Haven can remain as a four lane boulevard are countered by the DEIS. As such, it makes little sense to purchase ROW in two corridors. The extra ROW should be obtained along the current corridor, and the appropriate fixes made on the current alignment. As shown in the DEIS, this would adversely impact the fewest communities in the study area.

5

**Any realignment of the corridor will result in changed land use development patterns for Ottawa County and West Michigan, at a rapidly accelerated rate.** The development of a major transportation corridor through rural areas will change the character of the area and result in some of the most devastating urban sprawl ever experienced in Michigan. Some of Michigan's most productive farmland would be threatened, as would the community character of rural West Michigan. The appeal of living in the "rural" areas within easy driving distance of urban centers would further degrade the urban centers and induce additional and longer transportation trips. The sprawl will also cost local communities immensely as the delivery and provision of services will need to expand.

6

Furthermore, the Ottawa County Development Plan categorizes the majority of the land being considered in the bypass options as agricultural and rural preservation areas. Alternative A results in the least negative impact on development patterns and land use changes.

6

**Alternative A is one of the least disruptive alternatives in regards to the natural environment.** West Michigan has a rich resource of natural environments to protect and preserve. Alternative A avoids unnecessarily altering these areas in the attempt to solve a problem created by people and travel patterns. Alternative A is also supported by the DEIS as one of the most beneficial in regards to the air quality of the region.

7

**The creation of another state-owned corridor in the study area is fiscally irresponsible.** Whereas the development of Alternative A would be a logical investment in a corridor already owned and maintained by the Michigan Department of Transportation, the development of any new corridor would result in two corridors for MDOT to manage and maintain in perpetuity. While the initial construction costs for many of the alternatives is similar, the long term costs will be much greater with any bypass alternatives, as it is reasonable to believe that the current corridor will remain a state roadway, with state-incurred costs, under any of the proposals. These long-term operational costs have not been appropriately considered to this point.

8

**The development of Alternative A will provide for better and safer East/West and North/South travel in lakeshore communities.** Two of the primary concerns with the current traffic situation along US-31 is that North/South travelers face congestion, and that East/West travel in the neighboring communities is blocked by US-31 traffic. Both of these concerns can be addressed with Alternative A, as grade separations (overpasses) will separate the North/South traffic from the local traffic, and remove the through-traffic as a barrier to local mobility. Both sectors of the traveling community can be satisfied as the traffic situation is resolved, and interchanges allow for the integration of mobility and access. Furthermore, the creation of pedestrian and bicycle facilities under the overpasses will also make travel safer for the non-motoring public.

9

**The fixed-span bridge called for along the current alignment in Alternative A is the best solution for maintaining traffic flow over the Grand River.** While malfunctions of the bascule bridge can be minimized through proper design and maintenance, routine openings and closings of the bridge to accommodate recreational boaters are unreasonably disruptive to the transportation system. A fixed span bridge designed to accommodate a reasonable majority of Grand River traffic is a much better alternative than the bascule bridge alternatives.

10

**Land uses affected by Alternative A in the urban areas can quickly be restored in better, planned locations, whereas the rural land uses changed by the bypass alternatives will never recover.** While it is true that a certain level of commercial displacement will occur in the urban areas, it is reasonable to expect that many of these displaced entities will continue to do business in the area and can be reestablished in the local community. Through proper community planning and zoning, these commercial establishments can be directed to the most appropriate locations for development, and eventually enhance the area's development. These same accommodations cannot be made in rural areas, where the displacement of a farming operation or undeveloped parcel is unlikely to be re-established elsewhere.

11

**The Cost-Effectiveness Analysis in the DEIS shows that Alternative A provides the highest measure of effectiveness in each of the categories for which cost-effectiveness was calculated.** This is strong statement in support of Alternative A, especially when it is considered that the cost-effectiveness analysis did not seem to measure the costs associated with MDOT's future maintenance costs for multiple corridors or the secondary costs associated with the land use changes of the bypass options.

#### **CONCLUSION**

The rationale set forth in this position paper is a sampling of the reasons that **Muskegon Area Community Leaders, meeting as the Muskegon County US-31 Blue Ribbon Committee, are in favor of Alternative A.** The Freeway on Existing US-31 provides the best solution to the existing problem and causes the least disruption in long term development patterns for shoreline counties.

The Muskegon County US-31 Blue Ribbon Committee looks forward to the decision of the Michigan Department of Transportation, and to the opportunity to continue discussions on this important issue with other communities in the area.

**West Michigan Shoreline Regional Development Commission (WMSRDC), December 17, 1998)**

See **Chapter 3** regarding the reasons why Alternative A was not selected as the Preferred Alternative. Specific responses are provided below.

1. Alternative A did not meet the Purpose and Need for the project as well as the Preferred Alternative due to the strong community objections from the City of Grand Haven and City of Holland. The Primary reason for opposition is due to the significant community impacts resulting from the loss of numerous commercial and residential buildings. Alternative A also does not provide additional access over the Grand River.
2. The current PA will provide capacity and operational improvements on existing US-31. The Preferred Alternative includes the construction of a six-lane boulevard on portions of existing US-31, however these improvements are not sufficient to alleviate all congested conditions in the corridor nor provide additional access over the Grand River in Ottawa County. Further, the cities of Grand Haven and Holland strongly oppose construction of a freeway through their cities.
3. There were many "Purpose and Need" elements that were addressed in the FEIS. While Alternative A may address several of the elements well, the PA satisfies the "Purpose and Need" of the project better than the other Practical Alternatives.
4. Alternative A did not meet the Purpose of or Need for the project as well as the current PA due to the strong community objections from the City of Grand Haven and City of Holland. The primary reason for opposition is due to the significant community impacts resulting from the loss of numerous commercial and residential buildings. Alternative A also does not provided additional access over the Grand River. See **Section 3.3.3** for further explanation as to why Alternative A was not selected as the Preferred Alternative.
5. The current PA was modified between the DEIS and the FEIS to include an expansion of portions of existing US-31 to a 6-lane boulevard by widening in the inside median. The right-of-way impacts and relocation costs for the PA are significantly less than Alternative A.
6. On **Page 18** of the US-31 Land Use Study report is a table that compares the amount of built area among the Practical Alternatives at the township level. The built area percentage difference between Alternative A and the Preferred Alternative in Robinson and Crockery Townships (those through which the freeway connection travels) was reported to range between 0% and 2%.
7. Impacts attributable to the PA are significantly less than Alternative A, due to continued refinements to the alignment and its more likely extent.
8. It has not been determined which agency would have jurisdiction over exiting US-31 should the new alignment be constructed. It is expected that maintenance cost comparison would be equivalent for each alternative.
9. The Preferred Alternative was determined to best fulfill the "Purpose and Need" objectives for the project within the financial resources available. A discussion concerning Alternative A and the factors contributing to its elimination from further consideration are included in **Chapter 3**. In addition, Alternative A has no impact on east-west travel as suggested in this comment. A discussion of a non-motorized path in conjunction with the Preferred Alternative is found in **Section 4.5** of the FEIS.
10. The current PA does not include a new bridge in the City of Grand Haven.
11. The US-31 Land Use Study (included under a separate cover) showed that secondary and cumulative impacts should be expected in the form of new built areas throughout Ottawa County regardless of the Practical Alternative selected.

12. Cost-effectiveness was one of several considerations in the selection of the Preferred Alternatives. It must be balanced against the "Purpose and Need" of the project and other impacts. The Preferred Alternative more completely satisfies these elements within the resources expected to be available.
13. The Muskegon MPO has included the current PA in its 2035 Long Range Transportation Plan.

COMMISSIONERS:  
BRUCE D. CULVER  
JAMES S. ROLFE  
PHILIP QUADE

WILLIAM L. NELSON, Managing Director  
DELWIN L. REDDER, Asst. Engineer  
CLAIRE R. PATRICK, Business Manager

**Board of County Road Commissioners  
of Allegan County**

ALLEGAN, MICHIGAN 49010

1308 LINCOLN ROAD

TELEPHONE:  
(616) 673-2184

November 18, 1994

Mr. Scott Cook  
Environmental Planner  
GREINER, INC.  
3950 Sparks Dr., S.E.  
Grand Rapids, MI 49546

Re: US-31 Location Study

The Allegan County Road Commission has been informed of your current study and different options. We have no comments at this time. As further details become available, we will review their impact on the Allegan County Transportation system.

Very truly yours,



William L. Nelson  
Managing Director

WLN/rc

**Board of County Road Commissioners of Allegan County, November 18, 1994**

Comment acknowledged. No response required.

COMMISSIONERS:  
RICH D. CULVER  
WES S. ROLFE  
JOHN A. CRAVENS

WILLIAM L. NELSON, Managing Director  
DELRON L. REEDER, Asst. Engineer  
CLAIRE R. PATRICK, Business Manager

**Board of County Road Commissioners  
of Allegan County**

TELEPHONE (616) 873-2164

1308 LINCOLN ROAD  
ALLEGAN, MICHIGAN 49015-0782

FAX (616) 873-8922

**EXTRACT COPY**

*It was moved by Commissioner Cravens and second by Commissioner Rolfe that the Board of County Road Commissioners of Allegan County supports the US31 Alternative F/J1 proposal as approved by the M.A.C.C. Technical Committee.*

ROLL CALL VOTE AYES: Commissioners Culver, Rolfe, and Cravens  
NAYS: None Motion Carried

*I hereby certify that the above is a true extract copy of the Resolution taken from the minutes of the Board of County Road Commissioners regular meeting of January 13, 1999 in their office in Allegan County, Michigan.*

  
Claire R. Patrick, Secretary

**Board of County Road Commissioners of Allegan County, January 13, 1999**

Acknowledged receipt of Allegan County Road Commission's support for Alternative F/J1. No response required. The current PA includes critical segments of Alternative F/J-1.

# City of Holland

HOLLAND, MICHIGAN 49423

OFFICE OF THE CITY MANAGER  
270 River Avenue  
(616) 394-1310

November 16, 1994

Mr. Scot Cook  
Environmental Planner  
Greiner, Inc.  
3950 Sparks Drive S.E.  
Grand Rapids, MI 49546

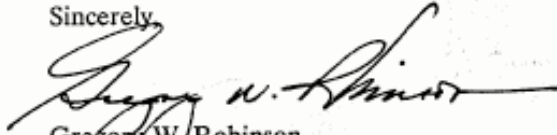
Dear Mr. Cook:

On behalf of the Holland Dial-A-Ride system, I have reviewed the US-31 project scoping information package which Ronald Gregory, of Greiner, sent to me.

The only concerns that the City has in relation to the Dial-A-Ride system are the increased congestion along the existing US-31 within the City limits and the increased safety concerns resulting from this congestion.

These concerns are expressed only in regard to the Holland Dial-A-Ride system and do not represent an official position on behalf of the City concerning the US-31 location design study. I appreciate the opportunity to comment on this matter and look forward to future correspondence from your office.

Sincerely,



Gregory W. Robinson  
Assistant City Manager

GWR/b

WHERE IT'S TULIP TIME IN MAY

**City of Holland, November 16, 1994**

1. The Preferred Alternative no longer includes improvements to US-31 within the city limits of Holland. However, it does address congested areas of US-31 just north of the city limits, within the current transit service area.

RESOLUTION

BE IT RESOLVED, that the City Council of the City of Holland does hereby endorse the MACC Technical Committee recommendation concerning future improvements to the U-31 corridor, and

BE IT FURTHER RESOLVED, that the City Council of the City of Holland hereby confirms the May 7, 1997 recommendation of the City Planning Commission, which is as follows:

- 1) Development of boulevard improvements to U.S. 31 as the State Highway passes through the City of Holland, with the objective of creating the "finest boulevard",
- 2) The City and Macatawa Area Coordinating Council should retain specialized design services to assist the City, the MACC, MDOT, and URS Greiner in developing an appropriate vision of what the boulevard should become,
- 3) The character and function of the recommended boulevard (MDOT alternatives P and P1) should be carefully studied,
- 4) In addition to the necessary concern for traffic and pedestrian safety and traffic management, concern over character and detail is extremely important, with an accommodation of curb and gutter improvements, pedestrian and bicycle access, significant park-like landscaping, longer-term opportunities for integration of future alternative transportation systems and programs, with reduced speeds as necessary to support such improvements, and
- 5) All improvements should minimize land acquisition and business disruption, and strive to connect the community across and along the highway rather than dividing the community east from west, and,

WHEREAS, the Holland City Council and MACC encourage MDOT to undertake improvements within the City on an accelerated time frame, independent of the scheduling for improvements in the Grand Haven area, and

WHEREAS, the Holland City Council urges MDOT and MACC to continue comprehensive planning and study for longer term completion of the State highway system through the Macatawa area, and,

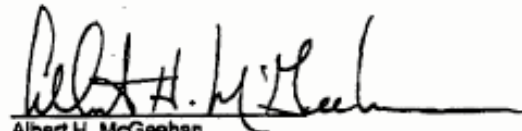
WHEREAS, the boulevard design is recommended as the most appropriate, responsible, and "final" improvement for highway infrastructure along the present U.S. 31 corridor, capable of serving the community's needs for the next 10 to 20 years, and,

WHEREAS, the existing U.S. 31 corridor through the City is not the final solution for meeting the State's longer term needs for completing the highway system from the southwest to northwest corners of the Lower Peninsula, and,

WHEREAS, the City recognizes the need for continued long-range traffic and land-use planning throughout the region which will allow appropriate land acquisition and completion of the State Highway serving those longer-term, larger-scale traffic needs.

NOW, THEREFORE, BE IT RESOLVED, that the City encourages MDOT and the State of Michigan to develop necessary legislation which will allow land acquisition for such long term, future highway improvements.

I hereby certify that the foregoing Resolution is a true and complete copy of a Resolution adopted by the Holland City Council at its regular meeting held January 13, 1999.

  
Albert H. McGeehan  
Mayor

  
Jodi S. Syens, City Clerk

**City of Holland, January 13, 1999 Resolution**

Acknowledged receipt of the City of Holland's resolution of support for Alternative F/J1 including boulevard improvements to US-31. The boulevard improvements recommended in this resolution have been made. The Preferred Alternative includes construction of US-31 from Lakewood Boulevard north to Quincy Street as a six-lane boulevard. In addition, several additional modifications, recommended by the City of Holland and the MACC since receipt of this resolution have also been made. See response to the MACC's "Recommended Future Improvements to the US-31 Corridor."

*City of Holland*

HOLLAND, MICHIGAN 49423

OFFICE OF THE MAYOR  
(616) 355-1314  
FAX (616) 355-1490



CITY OF GRAND HAVEN

Gail M. Ringelberg  
Mayor

January 21, 1999

Mr. Jose A. Lopez, Public Hearings Office  
Bureau of Transportation Planning  
Michigan Department of Transportation (MDOT)  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

Thank you for extending the time for receiving input from interested parties regarding US-31. This extension has allowed our councils to review the D.E.I.S. and make a better response.

The cities of Holland and Grand Haven are the two largest cities in Ottawa County. We both are directly impacted by US-31. The current route bisects our cities and we have seen the traffic grow throughout the years and have seen the impact of that growth on our communities. We have also seen that the growth in our local traffic is due to growth in population beyond our city boundaries. Yet our two cities have born the full brunt of that traffic growth.

Both the City of Holland and the City of Grand Haven would ask that MDOT look for a long-term solution to the traffic growth in Ottawa County. Building a new bridge crossing the Grand River at 120th, and continuing south on an improved road to link up with I-96 (F/J1 option) is the only long-term solution that makes sense. Ottawa County must have another route for the fast growing eastern part of the county to move north and south. The traffic going through Ottawa County along US-31 expects an efficient route that does not impede their travel. There is consensus among all northern governmental units and the City of Holland that another bridge is needed at 120th. This consensus will be affirmed by the Macatawa Area Coordinating Council (MACC) on January 25, 1999.

We encourage MDOT to move as quickly as possible to acquire land and begin the process of constructing a new US-31 route along the 120th corridor.

Sincerely,

Albert H. McGeehan  
Mayor, City of Holland

Gail Ringelberg  
Mayor, City of Grand Haven

**City of Holland/City of Grand Haven, January 21, 1999 Letter of Support for Alternative F/J1**

1. Acknowledged receipt of support for Alternative F/J1. The current Preferred Alternative includes a new Grand River crossing near 120<sup>th</sup> Avenue, and connects with I-96 and M-45..
2. Some hardship right of way has been acquired. Additional right-of-way acquisition will proceed following the approval of the Record of Decision on the FEIS.

# County of Muskegon

## R E S O L U T I O N

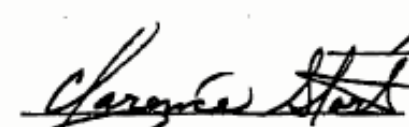

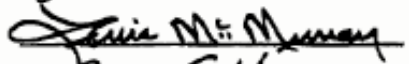

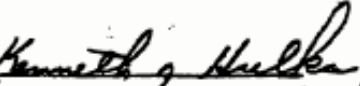
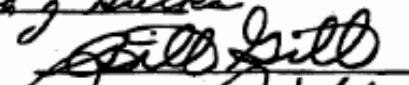



WHEREAS, the Michigan Department of Transportation has recently completed a Draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa and Muskegon Counties to determine the preferred alternative(s) for addressing traffic congestion on US-31;

WHEREAS, US-31 is a vital transportation corridor for Muskegon County; serves a significant number of commercial and industrial enterprises in the county, and will continue to be an important north-south corridor in the economic development of the West Michigan Region;

WHEREAS, community leaders in Muskegon County representing business, industry, tourism, government, financial institutions, and other interests have organized under the umbrella of a Muskegon County US-31 Blue Ribbon Committee to review the Environmental Impact Study and formulate a Muskegon County position regarding the alternatives under consideration;

WHEREAS, the position of the Muskegon County US-31 Blue Ribbon Committee is summarized in the enclosed position paper, which was unanimously adopted by the committee on November 16, 1998;

NOW, THEREFORE, BE IT RESOLVED that the County of Muskegon hereby endorses the position of the Muskegon County US-31 Blue Ribbon Committee and requests the Michigan Department of Transportation enter this resolution into the record of public comments.

   	    
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Adopted: January 28, 1999



**County of Muskegon, January 28, 1999 Resolution**

Acknowledged receipt of Muskegon County's January 28, 1999 resolution of support for the position of the Muskegon County US-31 Blue Ribbon Committee. This recommended support of Alternative A and opposition to bypass alternatives. See **Chapter 3** regarding the reasons why Alternative A was not selected as the Preferred Alternative. Also see responses to WMSRDC's comments.

## Ottawa County Road Commission

Rosy Mound Drive at US-31  
P.O. Box 739  
GRAND HAVEN, MICHIGAN 49417  
Phone (616) 842-5400 Fax (616) 850-7237

January 5, 1999

Mr. Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Re: US-31 from I-196 to I-96 in Allegan, Ottawa, and Muskegon Counties  
Draft Environmental Impact Statement

Dear Mr. Lopez:

The Ottawa County Road Commission has reviewed the above Draft EIS document and appendices and offers the following comments, suggestions, and requests for Michigan Department of Transportation's consideration. We trust this input will be used in the Department's decision process in selecting an alternative to relieve traffic congestion on US-31.

1. Draft EIS, Page 3-3, Section 3.2.1

Last paragraph states "LOS (Level of Service) 'E' is acceptable ....". LOS "E" is considered upper limit of acceptability and indicates delays up to 60 sec. would be occurring on a regular basis. This LOS would not be acceptable to motorists in this area on a long term basis.

2. Appendix A, 2005 & 2020 TSM Alt., Figure 3.2-2.7

Reconstruct BL-196 interchange to add southbound US-31 to eastbound BL-196 off ramp as loop configuration. This is necessary to reduce existing backup and delay on existing southbound US-31 off ramp.

3. Appendix A, 2005 & 2020 TSM Alt., Figure 3.2-2.8

East Lakewood Blvd. east of US-31 is presently 5 lanes (center lane for left turns).

4. Appendix A, Alt. A, Figure 3.3-4.12 & Draft EIS, Page 3-5, Table 3.3-1

Construct Greenly St. east of US-31 to Beeline Rd. to provide access to existing businesses and properties.

5. Appendix A, Alt. A, Figure 3.3-4.19 & Draft EIS, Page 3-5, Table 3.3-1

Add grade separation at Buchanan St.

2.

6. Appendix A, Alt. A, Figure 3.3-4.20 & Draft EIS, Page 3-5, Table 3.3-1 To provide access to US-31 from Lincoln St. extend service roads south to Lincoln St.	6
7. Appendix A, Alt. A, Figure 3.3-4.21 & Draft EIS, Page 3-5, Table 3.3-1 To provide access to US-31 from Rosy Mound Dr. and Hayes St. construct grade separation at Rosy Mound Dr. and extend service roads.	7
8. Appendix A, Alt. F, Figure 3.3-8.5 & Draft EIS, Page 3-7, Table 3.3-2 Add grade separation at 112th Av.	8
9. Appendix A, Alt. F, Figure 3.3-8.8 & Draft EIS, Page 3-7, Table 3.3-2 Add interchange at Fillmore St.	9
10. Appendix A, Alt. F, Figure 3.3-8.13 & Draft EIS, Page 3-7, Table 3.3-2 Add ramp from eastbound M-104 to southbound US-31.	10
11. Appendix A, Alt. J1, Figure 3.3-17.3 & Draft EIS, Page 3-16, Table 3.3-5 Add interchange at 120th Av.	11
12. Appendix A, Alt. P/P1r, Figure 3.4-4.38 Reconstruct or realign Michigan Av. west of Apple Dr. Connection to Michigan Av. not adequate as shown.	12
13. Appendix A, Alt. P1r, Figure 3.4-7.13 Add left turn lane for northbound and median opening at Barry St.	13
14. Appendix A, Alt. P1r, Figure 3.4-7.14 Add left turn lanes and median opening at Bingham St.	14
15. Appendix A, Alt. P1r, Figure 3.4-7.16 Add left turn lanes and median opening at Stanton St.	15
16. Appendix A, Alt. P1r, Figure 3.4-7.17 Add left turn lane and median opening at Pierce St.	16
17. Appendix A, Alt. P1r, Figure 3.4-7.20 Add left turn lane and median opening at Rosy Mound Dr.	17
18. Appendix A, Alt. R, Figure 3.5-4.12 Add ramp from eastbound M-104 to southbound US-31.	18
In addition, please find enclosed copy of March 23, 1995 letter to Mr. Michael Jaeger regarding	19

3.

interchange and intersection locations. Once again, the Ottawa County Road Commission requests the opportunity to review more detailed design plans of the selected alternative before considering final approval of access locations.

19

The Road Commission encourages the Michigan Department of Transportation and Federal Highway Administration to complete and approve the final Environmental Impact Statement document in a timely manner and would urge the Department to select an alternative to relieve US-31 congestion as soon as possible.

If there are questions regarding the Road Commission's comments, please contact Mr. Thomas A. Palarz, Engineering Director, at (616) 850-7221.

Sincerely,



Lawrence B. Bruursema  
Chairman  
Board of County Road Commissioners  
County of Ottawa

## Ottawa County Road Commission

Rosy Mound Drive at US-31  
P.O. Box 739  
GRAND HAVEN, MICHIGAN 49417  
Phone (616) 842-5400

March 23, 1995

COPY

Mr. Michael J. Jaeger  
Greiner, Inc.  
3950 Sparks Drive, S.E.  
Grand Rapids, MI 49546

Re: US-31 Location Design Study  
Interchange & Intersection Locations

Dear Mr. Jaeger:

In response to your request, the Ottawa County Road Commission has reviewed your list of proposed interchanges and intersections for each alternative (A, F, & P) as well as Task 9.0 Corridor Alternatives plans that were provided to our office. Realizing that concerns of the Macatawa Area Coordinating Council are generating additional discussions with Greiner, Inc., our review at this time did not include area south of New Holland Street. Also, areas north of Robbins Road within City of Grand Haven and City of Ferrysburg are outside of our road jurisdiction and are not addressed.

Enclosed are preliminary recommendations regarding location of interchanges, overpasses/underpasses, intersections, and road closures for Alternatives A, F, and P. It is emphasized that these recommendations are preliminary in nature, based on limited design information, and only intended for US-31 Study purposes. The Road Commission requests the opportunity to review more detailed design plans of the final selected alternative before considering approval of access locations.

Thank you for the opportunity to comment and provide input in the US-31 Study process.

Sincerely,

Thomas A. Palarz  
Engineering Director

TAP:jd

cc: Ms. Sue Higgins, MACC  
Mr. Ed Koryzno, City of Grand Haven  
Mr. Dennis Craun, City of Ferrysburg

3/21/95

Ottawa County Road Commission

Preliminary Recommendations

Alternative A - Freeway on Existing US-31

A. Interchanges

1. New Holland Street
2. Port Sheldon Street
3. Croswell Street
4. Fillmore Street
5. M-45 (Lake Michigan Drive) & Winans Street
6. Lincoln Street & Ferris Street (combination with frontage roads)
7. Rosy Mound Drive, Hayes Street, & Comstock Street (combination with frontage roads)
8. Robbins Road
9. Van Wagoner Street

B. Overpasses/Underpasses

1. Van Buren Street
2. Tyler Street
3. Stanton Street
4. Winans Street
5. Buchanan Street
6. Lincoln Street
7. Ferris Street
8. Rosy Mound Drive
9. Hayes Street
10. Comstock Street
11. Taft Street

C. Closed Roadway Access

1. Barry Street (new frontage road)
2. Bingham Street (new frontage road to 136th Avenue)
3. Blair Street
4. Bagley Street (accommodate existing commercial traffic)
5. West Olive Road
6. Taylor Street
7. 152nd Avenue (realign/new frontage road)
8. Pierce Street
9. Warner Street
10. Hickory Street
11. Wilson Street

3/21/95

Ottawa County Road Commission

Preliminary Recommendations

Alternative F - Freeway on New Alignment

A. Interchanges

1. Existing US-31
2. Port Sheldon Street
3. Fillmore Street
4. M-45 (Lake Michigan Drive)
5. North Cedar Drive
6. I-96/M-104

B. Overpasses/Underpasses

1. New Holland Street
2. Van Buren Street
3. Tyler Street
4. Polk Street
5. 120th Avenue
6. Stanton Street
7. Buchanan Street
8. Lincoln Street
9. Johnson Street
10. Leonard Street

C. Closed Roads

1. Bingham Street
2. Blair Street
3. Taylor Street
4. Pierce Street
5. Sleeper Street
6. 120th Avenue (new frontage road)
7. Arthur Street (new frontage road)

3/21/95

Ottawa County Road Commission

Preliminary Recommendations

Alternative P - Boulevard on Existing US-31

A. Intersections

1. New Holland Street
2. Van Buren Street
3. Port Sheldon Street
4. Blair Street
5. Tyler Street
6. Bagley Street
7. Croswell Street
8. Taylor Street
9. Stanton Street
10. Fillmore Street
11. Winans Street
12. M-45 (Lake Michigan Drive)
13. Buchanan Street
14. Warner Street
15. Lincoln Street
16. Ferris Street/168th Avenue
17. Rosy Mound Drive
18. Hayes Street
19. Comstock Street
20. Robbins Road

B. Closed Roads

1. 128th Avenue

C. No Access Across Median\*

1. Barry Street
2. Bingham Street
3. West Olive Road
4. 152nd Avenue
5. Pierce Street

\* Include median crossovers/turnarounds at appropriate intervals

3/21/95

Ottawa County Road Commission

Preliminary Recommendations

Alternative P - Boulevard on Comstock Street

A. Intersections

1. 172nd Avenue
2. 168th Avenue
3. 160th Avenue
4. Mercury Drive
5. M-104/144th Avenue
6. 136th Avenue
7. 130th Avenue
8. 120th Avenue

B. Overpasses

1. Boom Road
2. Leonard Road
3. Robbins Road/152nd Avenue

C. Closed Roads

1. Existing Comstock Street
2. Canary Drive
3. Harry Street

D. No Access Across Median\*

1. Airport Drive
2. Indian Trails Drive
3. Sharon Street
4. 140th Avenue
5. 124th Avenue

\* Include median crossovers/turnarounds at appropriate intervals

**Ottawa County Road Commission, January 5, 1999**

Comments, suggestions and requests were addressed during meetings with individual cities or townships and the Ottawa County Road Commission, and incorporated into the Preferred Alternative where feasible. A complete list of all these meetings can be found in **Section 5.5**. Specific responses to the individual comments are found below.

1. A discussion of the No-Action 2030 Intersection Level of Service (LOS) is found in **Section 2.2.3**. Intersection LOS information for the Preferred Alternative can be found in **Section 3.5**. For the Preferred Alternative, one signalized intersection, (Jackson Street in Grand Haven) will operate at LOS E in the p.m. peak. All other Preferred Alternative intersections operate at LOS D or better in both the a.m. and p.m. peak hour.
2. The Preferred Alternative does not extend south to the US-31/I-196BL interchange. Improvements to this interchange may be considered separately from this project.
3. The aerial mosaics have been updated to year 2004.
4. Requested improvement was added to Alternative A to maintain access to existing local businesses; however, Alternative A was not selected as the Preferred Alternative.
5. The requested grade separation at Buchanan Street for Alternative A was considered; however, Alternative A was not selected as the Preferred Alternative.
6. The requested frontage road extension to Lincoln Street for Alternative A was considered; however, Alternative A was not selected as the Preferred Alternative.
7. The requested grade separation at Rosy Mound Drive for Alternative A was considered; however, Alternative A was not selected as the Preferred Alternative.
8. The requested grade separation at 112th Avenue for Alternative F was considered and included in Alternative F/J1; however, the current PA does not impact this area.
9. The requested interchange at Fillmore Street for Alternative F was considered, however, Ottawa County later rescinded this request. The current PA does not impact this area.
10. The requested ramp movement from eastbound M-104 to southbound US-31 and the new Freeway Connection was included in Alternative F/J1; however, the current PA does not impact this area.
11. The requested interchange at 120th Avenue for Alternative J was considered, however, it could not be included when the alignment was moved to the south in response to concerns of the local township. The current PA does not include an east-west freeway connection between existing US-31 and the proposed new route
12. The requested Michigan Avenue reconstruction/realignment west of Apple Avenue was considered; however, Alternative P/P1r was not selected as the PA.
13. The requested addition of a northbound turn lane at Barry Street for Alternative P1r was considered; however, the P1r was not selected and PA does not impact this area.
14. The requested left turn movements at Bingham Street for Alternative P1r were considered; however, the P1r was not selected and PA does not impact this area.
15. The requested left turn movements at Stanton Street for Alternative P1r were considered; however, the P1r was not selected and PA does not impact this area.

16. The requested left turn movements at Pierce Street for Alternative P1r were considered; however, the P1r was not selected and PA does not impact this area.
17. The requested left turn movements at Rosy Mound Drive for Alternative P1r were considered; however, the P1r was not selected and PA does not impact this area.
18. The current PA will have access from eastbound M-104 to the new roadway alignment southbound.
19. Ottawa County Road Commission was invited and attended numerous meetings with local governments, the general public, and others to refine the alternatives and select the Preferred Alternative.



**OFFICE of the COUNTY CLERK**

414 Washington Street, Room 301 • Grand Haven, MI 49417 • 616/846-8310 • FAX 616/846-8138

Daniel C. Krueger  
County Clerk

Frances M. Homik  
Chief Deputy

January 27, 1999

Mr. Jose' A. Lopez', Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Mi. 48909

Dear Mr. Lopez',

The enclosed US 31 Staff Position Paper prepared by the Ottawa County Planning and Grants Department was approved by the Ottawa County Board of Commissioners on Tuesday, January 26, 1999 by the following motion: "To approve the US 31 Staff Position Paper and its recommendation for an FJ1 Alignment and forward a copy of this resolution to the Michigan Department of Transportation".

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel C. Krueger", is written over the typed name.

Daniel C. Krueger,  
Ottawa County Clerk

CC: Mark Knudsen, Planning and Grants Director

Enclosure

P.S. There was no resolution presented or passed at this Board of Commissioners meeting.



## **US 31 STAFF POSITION PAPER**

**Prepared by the Ottawa County Planning and Grants Department**

**January 22, 1999**

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This paper was made possible through the support of the  
Ottawa County Board of Commissioners:

Cornelius Vander Kam, Chair  
Leon Langeland, Vice Chair  
Edward Berghorst  
Joseph Haveman  
Joyce Kortman  
D. Dale Mohr  
Robert J. Rinck  
Roger Rycenga  
Harris Schipper  
Gordon Schrotenboer  
Dennis W. Swartout  
Frederick Vander Laan  
Cynthia Visscher

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### **SITUATION STATEMENT**

The discussion of the problems surrounding US-31 have been occurring for over ten years and a decision from MDOT regarding the future alignment is finally at hand. The County understands and appreciates the opinions and fears of all the various communities and recognizes that since this is such a controversial issue, complete consensus cannot be attained. However, the County also understands that it is in the best interest of the County as a whole to resolve present and future problems on US-31. Therefore, it is the intent of the Planning Department and the Planning Commission to provide the County Board of Commissioners with a recommendation from a planning perspective that represents a long term solution beneficial to the County as a whole.

### **METHODOLOGY**

Knowing that it will be impossible to reach a complete consensus on the preferred alignment for US-31, the priority in selecting a preferred alignment is to select the alternative that is in the best interest for the entire county. To this point, several criteria were used in considering each alternative: 1) The need to plan from a countywide transportation perspective; 2) The need to plan for 30 to 50 years; 3) The need for an uninterrupted north-south freeway; and 4) The immediate need for an additional bridge across the Grand River.

This paper summarizes the analysis that was conducted on each viable alternative from several different objective perspectives (public comment, transportation, cost, social, economic, farmland, environmental, and secondary impacts) to select an alternative based on factual information and logical assumptions. The format of the paper is as follows:

1. Each alternative is ranked in a table, by category, according to the information contained in the Draft Environmental Impact Statement (DEIS).
2. Each DEIS ranking is followed by the Planning Department's preferred alternative based on long term planning (30 to 50 years).

It is important to keep in mind that no matter which alternative is selected, it will likely be at least 10 years before it is completed, so it is essential that the selected alternative not be one that will be obsolete the day that it is finished. In some cases, our conclusion for the best alternative based on long range planning in a particular category is different than the alternative that ranked highest based on the 2020 information in the DEIS.

### **ELIMINATION OF WEAK PROPOSALS**

The following alternatives were eliminated from further consideration by the Ottawa County Planning Department:

#### **No Action**

Based on the traffic analysis of year 2020 traffic volumes in the DEIS, this alternative will result in increased highway congestion and a Level of Service (LOS) of "E" and "F" during peak periods. The LOS refers to the average amount of delay experienced by vehicles at an intersection. LOS "A" indicates free flow traffic conditions while LOS "F" indicates intersection failure. Thirty of the 42 intersections will operate at a LOS of "F" during one or both of the peak periods in the year 2020.

#### **2005 TSM (Transportation System Management)**

This alternative cannot be used as a stand alone option and is meant to be a short-term solution to ease traffic congestion prior to construction of a selected alternative. The option of Transportation System Management will help the traffic flow by improving signals and limiting access in the short term, but will not change the volume of traffic or adequately plan for the future. This option should be used in conjunction with a separate stand alone solution.

#### **2020 TSM (Transportation System Management)**

This alternative cannot be used as a stand alone option. Based on the traffic analysis of year 2020 traffic volumes in the DEIS, this alternative will result in 18 of the 42 intersections experiencing a LOS of 'F' during the evening peak hour. The option of Transportation System Management will help the traffic flow by improving signals and limiting access in the short term, but will not change the volume of traffic or adequately plan for the future. This option should be used in conjunction with a separate stand alone solution.

#### **Alternative F**

This alternative is not practical due to the fact that there is no connector north of Holland and will not decrease demand on existing US-31 enough to attain an acceptable LOS on existing US-31.

**Alternative J1**

This alternative was eliminated because the Planning Department felt that it was just a weaker duplication of portions of Alternative A and Alternative F/J1.

**PUBLIC COMMENT****Numerical Ranking Of Choices For The Best Alternative**

<b>Alternatives</b>	<b>Public Opinion</b>	<b>Ranking</b>
F/J1	Opposition/Support	Cannot be Ranked
F1/F3	Opposition/Support	Cannot be Ranked
A	Opposition/Support	Cannot be Ranked
P	Opposition/Support	Cannot be Ranked
Plr	Opposition/Support	Cannot be Ranked
R	Opposition/Support	Cannot be Ranked

If a decision were to be made based solely on public opinion, it would be very difficult to select a preferred alternative. The communities that will be directly impacted by the location of US-31 have all stated that they do not want the freeway in their "backyard." While most people agree that something needs to be done to alleviate the traffic problems on existing US-31, there is no community consensus for which alternative is best. Existing citizen groups, local units of government, and other community organizations have gone on record to support their distinct, yet preferred alignments. For this reason, the alternatives cannot be ranked based on public opinion.

**Long Range Planning (2030-2050)**

Although a preferred alignment cannot be selected at this time based on public opinion, it is the belief of the Planning Department that the vast majority of Ottawa County residents will prefer a freeway along the 120th as opposed to a freeway along the existing alignment once it is built. This opinion is based on the fact that communities in Ottawa County can and will adjust to whichever alignment is ultimately selected, whether it be the existing alignment or a bypass. However, in 30 to 50 years and even further beyond, the traffic scenario in Ottawa County will be such that if the existing alignment is selected, it will not be adequate to handle the immense volume of cars since Alternative A does not divert any traffic. We will then be faced with the difficult task of trying to build a freeway to divert vehicles onto another route. Then, the cost and social implications of acquiring the right-of-way necessary to construct a freeway 50 years from

now will be enormous due to the projected development that would have taken place during that time. For this reason, it is logical to think that 50 years from now, residents of Ottawa County will commend us for making the difficult decision of building a new freeway along 120th Avenue and preparing Ottawa County for the growth they will surely have rather than admonish us for choosing an alignment that is sure to fail again in the future forcing the next generation to grapple with this issue yet again.

**TRANSPORTATION****Numerical Ranking Of Choices For The Best Alternative**

Alternatives	Traffic Use	LOS on New Alignment in 2020	LOS on Existing US-31 in 2020	Ranking
F/J1	17,400	A or B	C or D	1 (First)
P	17,400	C or D	C or D	2
P1r	17,400	C or D	C or D	2
F1/F3	17,000	C or D	C or D	3
A	83,000	C or D	N/A	4
R	16,000	E	C or D	5 (Last)

(Pages 3-12, 3-15, 3-21, 3-24, 3-28)

**Design Year 2020**

The most important component of any transportation project is the ability to efficiently move traffic. Using this standard, Alternative F/J1 is by far the superior choice if considering the level of service and total overall traffic diversion. According to the DEIS, Alternative F/J1 will be used by 17,400 vehicles a day and traffic on the F/J1 alignment will operate at a Level of Service (LOS) of A or B while traffic on the existing US-31 will operate at a LOS of C or D. Alternative A would have the most traffic use at Grand Haven and some other specific points along the corridor, but building a 4 lane freeway on the existing alignment will not lower traffic counts due to the fact that no vehicles are diverted. Traffic will move at a faster rate of speed but according to the DEIS, a LOS of A or B will not be attainable due to the large volume of vehicles on the road.

**Long Range Planning (2030-2050)**

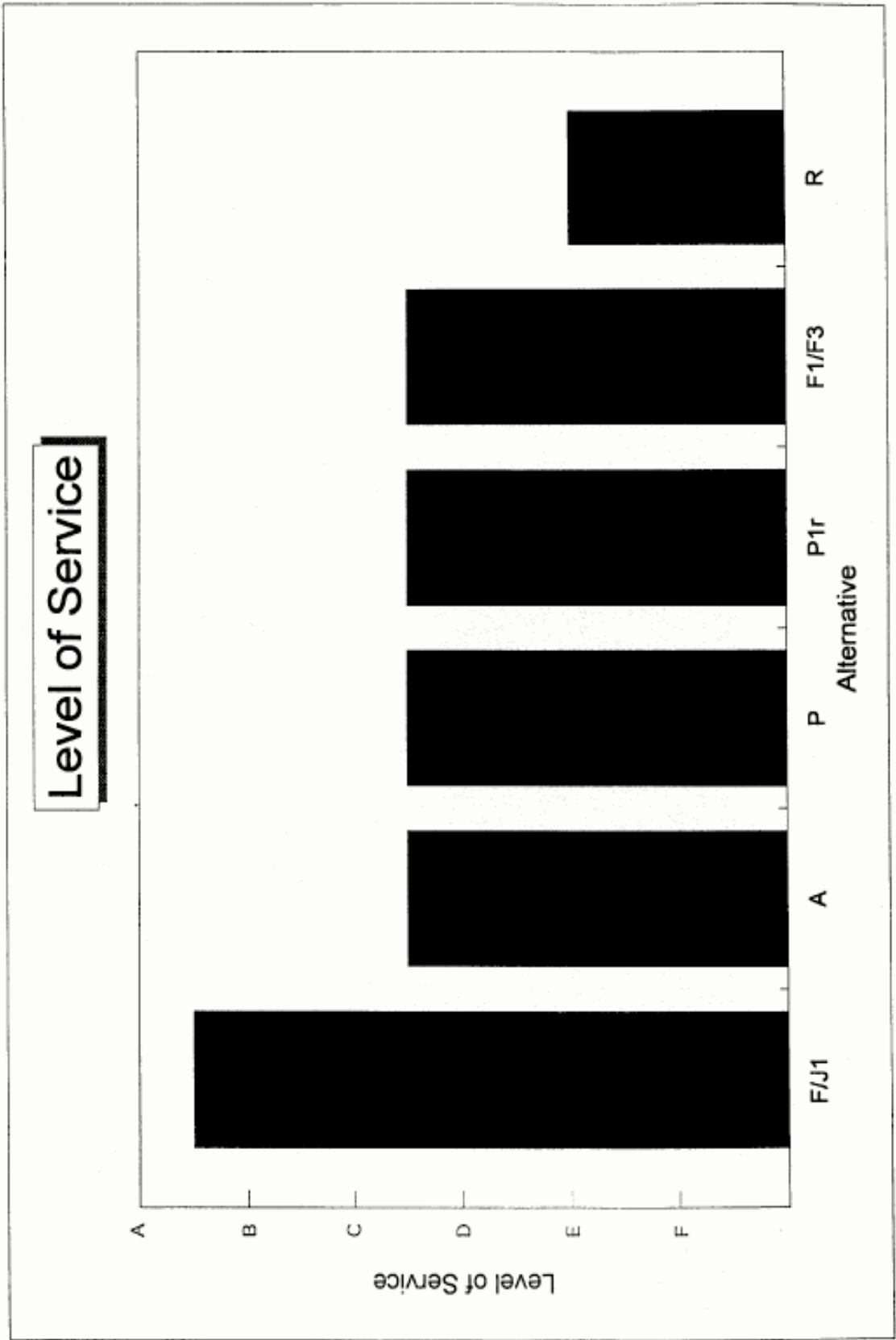
Not only is F/J1 the best alternative to alleviate total overall traffic, and provide the best level of service for the design year 2020, it also proves to be the best when planning for 2030-2050. Alternative F/J1 will offer travelers passing through the county an uninterrupted north-south route meaning that vehicles traveling to destinations north of Grand Haven will no longer have to mix with local traffic. This is especially important when you consider that truck transportation has increased 137% from 1990 to 1996. Construction of a bypass will divert trucks that are traveling

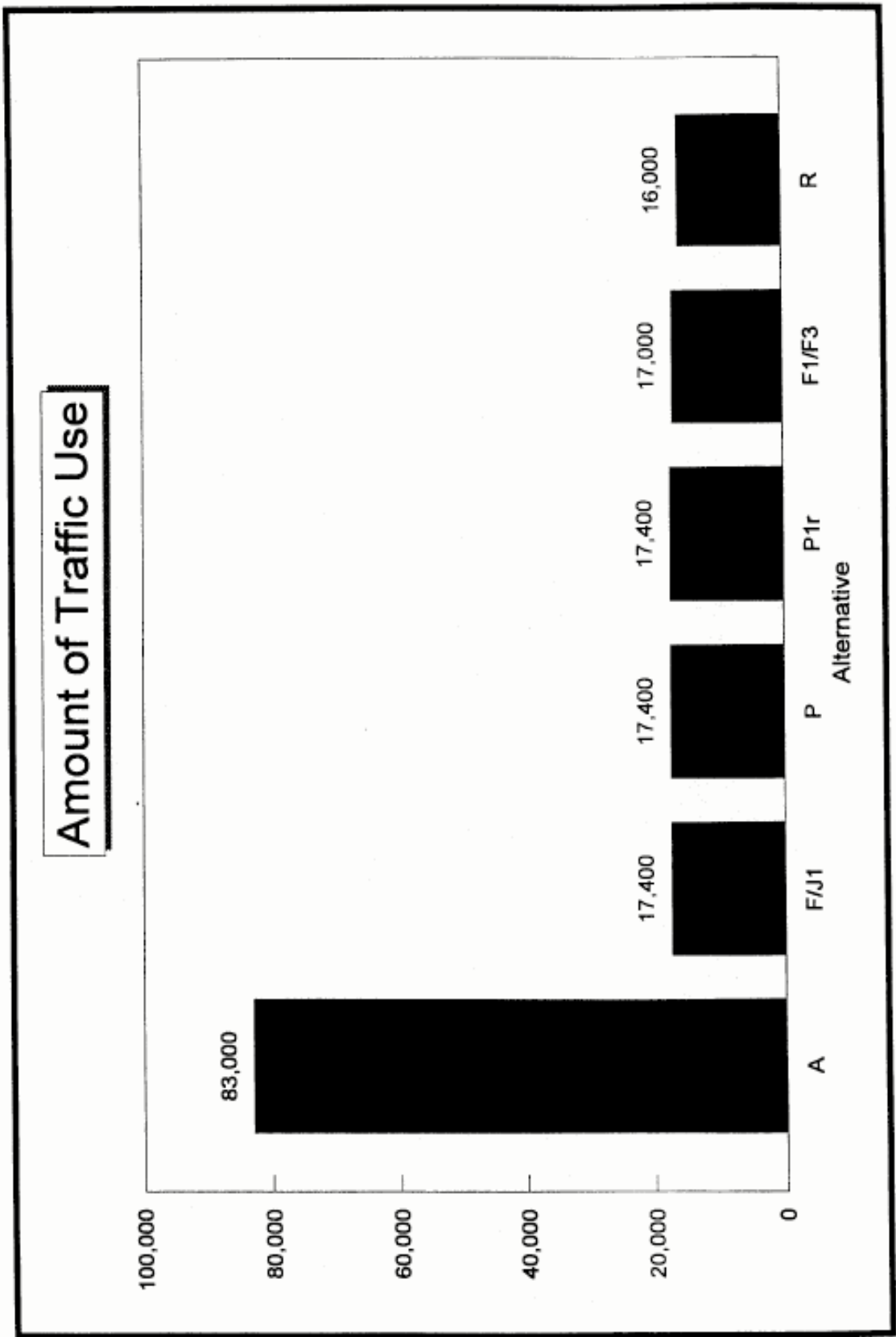
through the county on US-31, easing congestion and degradation of the road surface as well as increasing safety on the road. This is especially important when considering the economic growth that is occurring in the Allendale, Coopersville, Zeeland and Holland areas. These local economies will require an uninterrupted north-south route to serve their commercial needs. The goal of any highway system is to move traffic as efficiently and safely as possible and an uninterrupted north-south route from the Holland area to Interstate 96 will accomplish this.

A second advantage to Alternative F/J1 when planning for 2030-2050 is the fact that this alternative is centrally located making it easily accessible to all county residents. This is especially important since the rural areas of the County are experiencing tremendous population growth with emerging commercial/ industrial centers that are pushing towards the central rural corridor. This population and economic growth will facilitate the need for an uninterrupted north-south route that is more centrally located.

Last, if highway capacity is expanded through corridor "A" with Federal Funds, the only expansion possible in the future would be to widen the same strip again. Building additional capacity through Corridor "F/J1" now, provides for two optional channels for traffic expansion in the future.

The State, the County, and local communities must work together to ensure that travel within the county is safe and efficient and contributes to a high quality of life for residents and visitors. There must be a balance between access to land use and the need to move traffic along major highways. Long range travel routes must be available throughout the area to connect major concentrations of employment, shopping, and homes. Alternative F/J1 is the clear choice for achieving these goals.





## **COST**

### **Numerical Ranking Of Choices For The Best Alternative**

<b>Alternatives</b>	<b>Construction Cost</b>	<b>Ranking</b>
P1r	\$434. 1 Million	1 (First)
R	\$438. 1 Million	2
P	\$468. 4 Million	3
A	\$577. 2 Million	4
F1/F3	\$578. 6 Million	5
F/J1	\$587. 5 Million	6 (Last)

(Page 3-29)

### **Design Year 2020**

If a decision for the preferred alignment had to be selected based solely on construction cost for the design year 2020, Alternative P1r is the least expensive to build. However, this is misleading since Alternative P1r is not a freeway option therefore it is logical that this alternative is the least expensive to construct. Similarly, Alternatives P and R, neither of which are freeway options, have construction costs within 7.9% of Alternative P1r. The construction costs for Alternatives F/J1, A, and F1/F3 are within 1.7% of each other but are more expensive than the other three Alternatives since they are all freeway options.

### **Long Range Planning (2030-2050)**

#### **Numerical Ranking of Choices for the Best Alternative**

<b>Alternatives</b>	<b>Rate of Return on Investment</b>	<b>Ranking</b>
A	\$2.78	1 (First)
F1/F3	\$1.79	2
F/J1	\$1.10	3
R	\$0.56	4
P1r	\$0.51	5
P	\$0.42	6 (Last)

(Page 5-106)

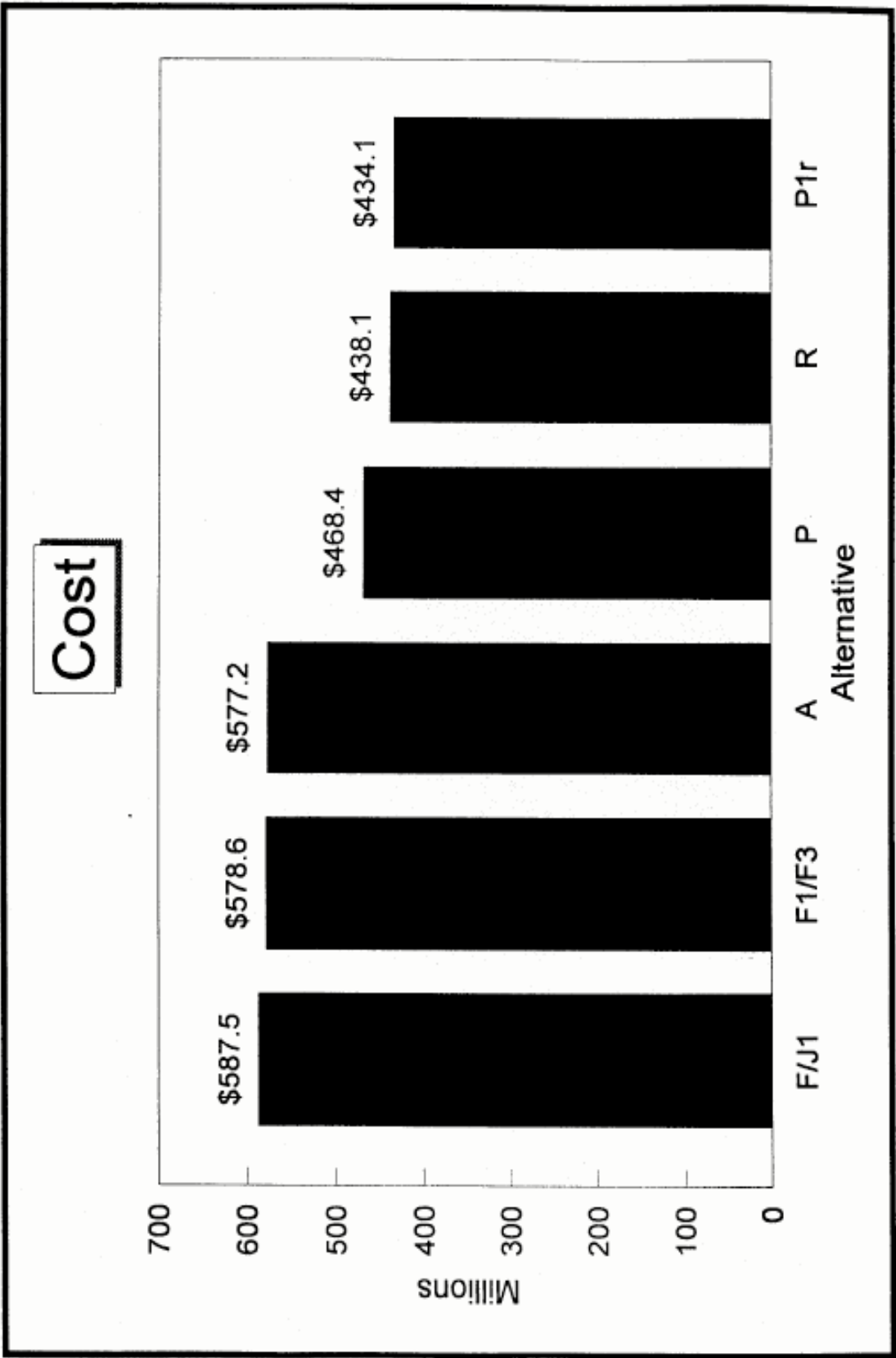
Possibly more important than the construction costs of each Alternative is the Rate of Return on Investment. The Rate of Return on Investment refers to the amount of benefit received for each \$1.00 of investment. By definition, any option that has a return on investment greater than \$1.00 has benefits that outweigh the cost and therefore is considered a viable option. Alternatives F/J1, A, and F1/F3 all have return rates of greater than \$1.00.

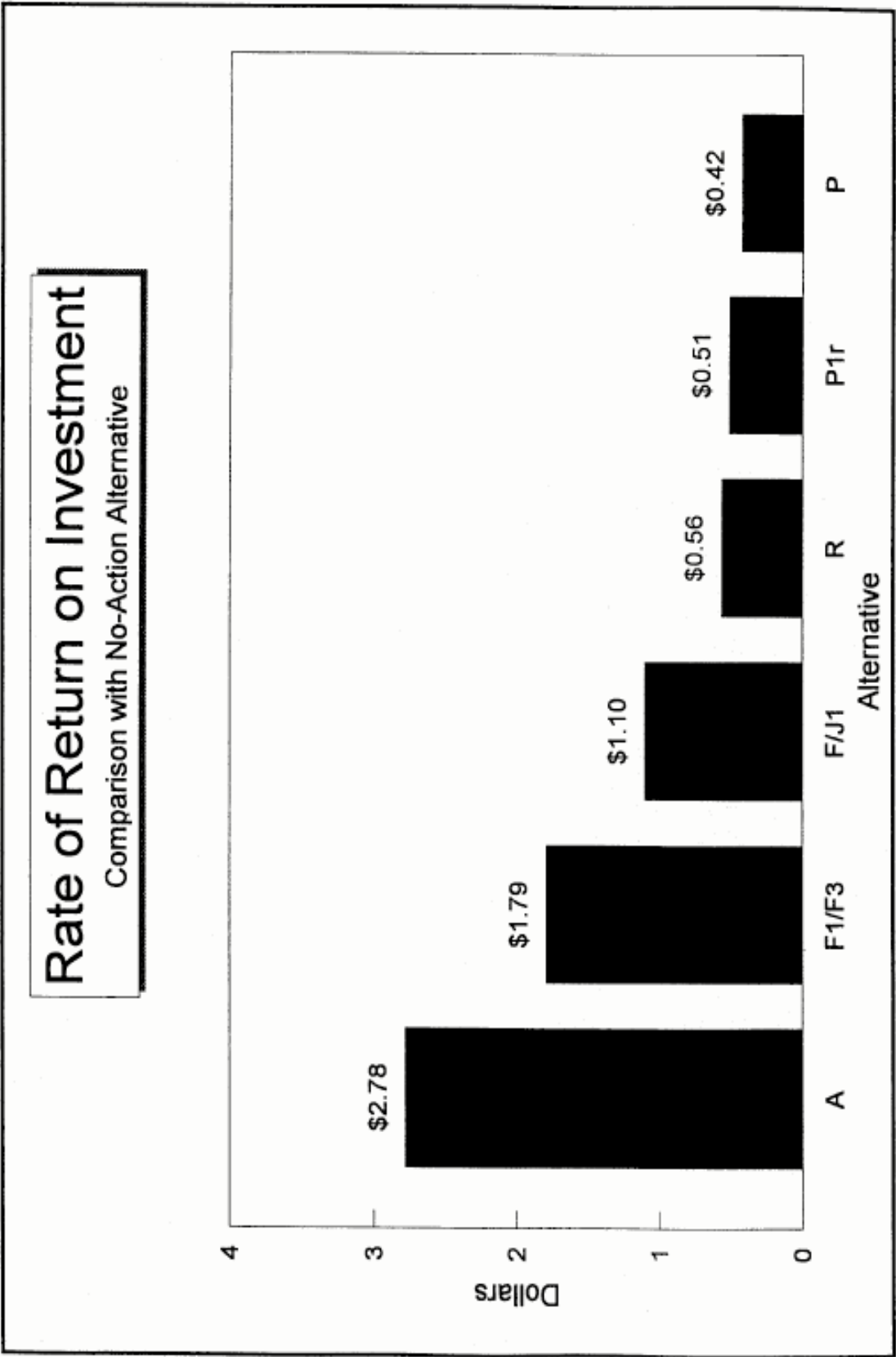
#### Numerical Ranking of Choices for the Best Alternative

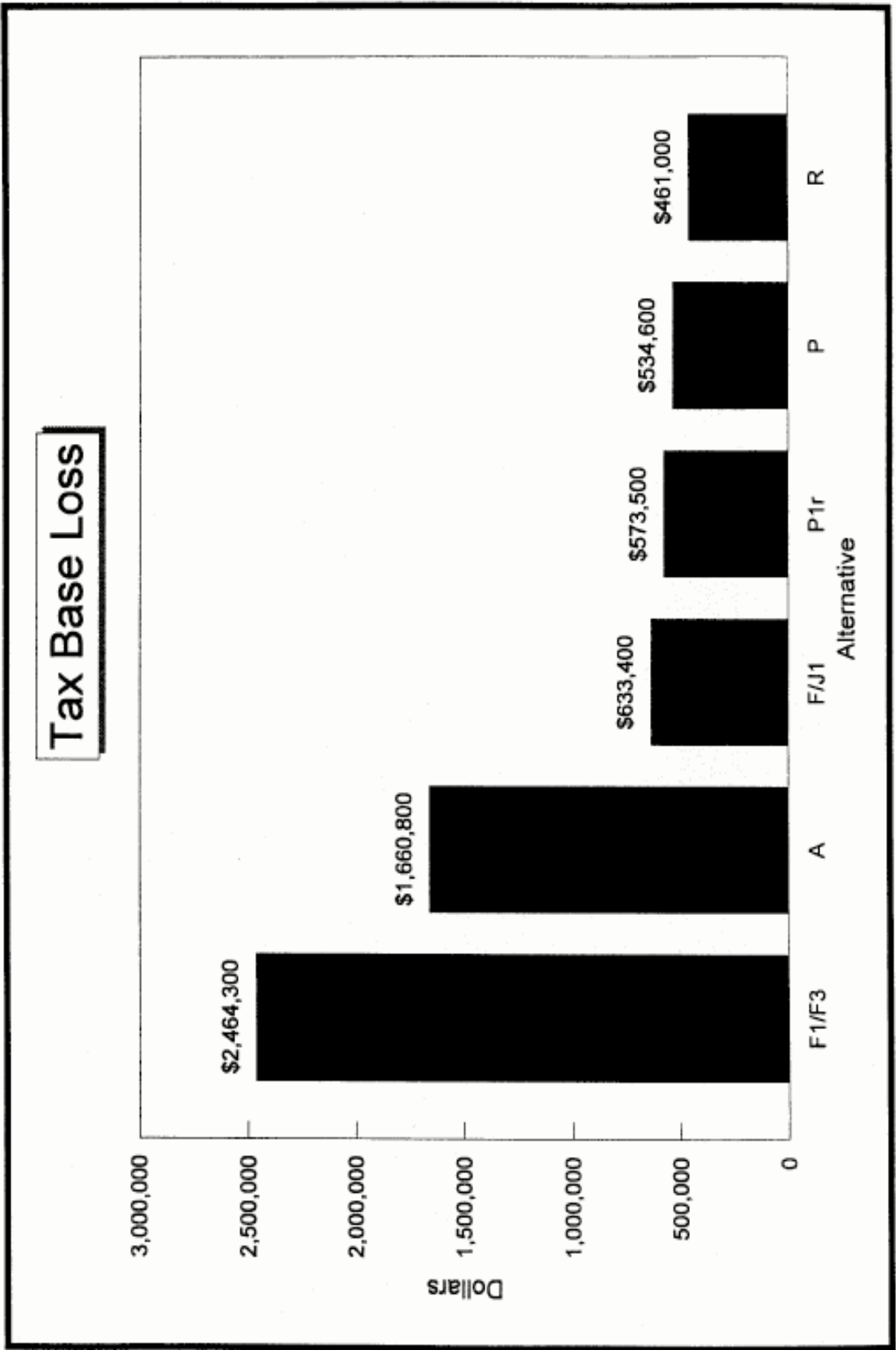
Alternatives	Tax Base Loss	Ranking
R	\$461,000	1 (First)
P	\$534,600	2
P1r	\$573,500	3
F/J1	\$633,400	4
A	\$1.66 Million	5
F1/F3	\$2.46 Million	6 (Last)

(Page 5-7)

Another measure of the costs associated with the various options is the tax base loss that will occur as a result of each alternative. The tax base loss is due to the acquisition of properties for construction of the various routes. Alternatives A and F1/F3 will have the greatest loss of tax base and clearly have the most detrimental financial impact.







**SOCIAL****Numerical Ranking Of Choices For The Best Alternative**

Alternatives	Number of Residences Impacted	Ranking
F1/F3	183	1 (First)
A	188	2
P	194	3
F/J1	205	4
P1r	211	5
R	292	6 (Last)

(Page 1-7)

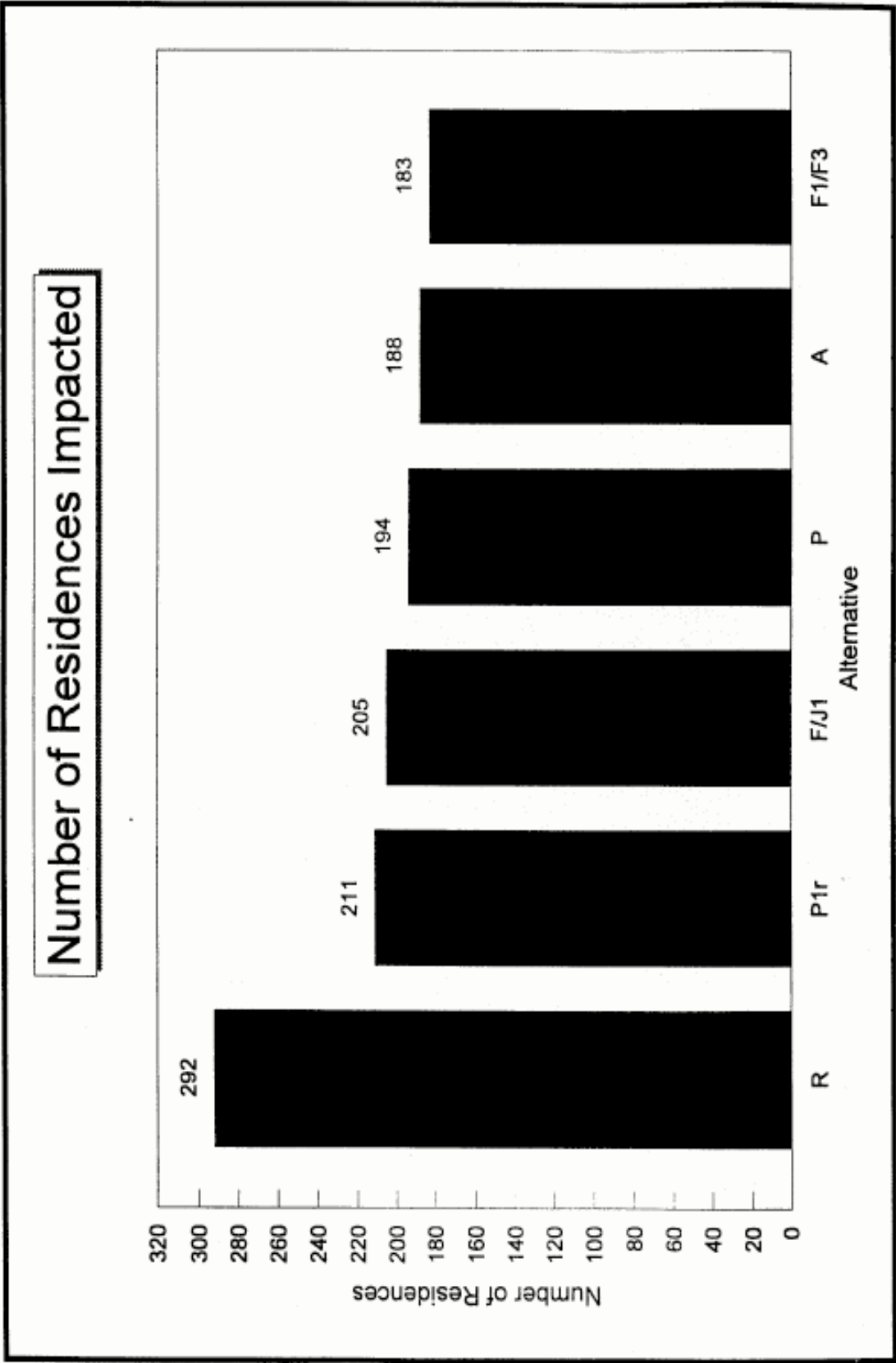
**Design Year 2020**

The impact upon residences is perhaps the most personal of all the impacts from this project. With the exception of Alternative R, the options are relatively close effecting between 183 and 211 residences.

**Long Range Planning (2030-2050)**

Each of the alternatives include improvements to the existing US-31 alignment such as the addition of another lane of traffic. Although this will have an impact on the Grand Haven community, putting a freeway or 8 lane boulevard through the city will have a more pronounced impact to the established community than a freeway would have on a relatively rural area - not that it isn't significant.

As development continues into the rural corridor it will become increasingly difficult to plan for future transportation routes and make any future right of way acquisition very difficult. If we prolong building a freeway along 120th Avenue, the delay will become very costly. First, the cost of acquiring right-of-way will increase as time goes on due to the natural development along the corridor. Second, as more homes and businesses are built in the area, the social impact of displacing the increased number of buildings accumulates. Growth will come with or without the bypass. It will be a lot easier to build a highway now, when land is available, than years from now when more homes and businesses may have to be displaced.



**ECONOMIC****Numerical Ranking Of Choices For The Best Alternative**

<b>Alternatives</b>	<b>Number of Businesses Impacted</b>	<b>Ranking</b>
R	147	1 (First)
P1r	149	2
F/J1	158	3
P	186	4
F1/F3	217	5
A	236	6 (Last)

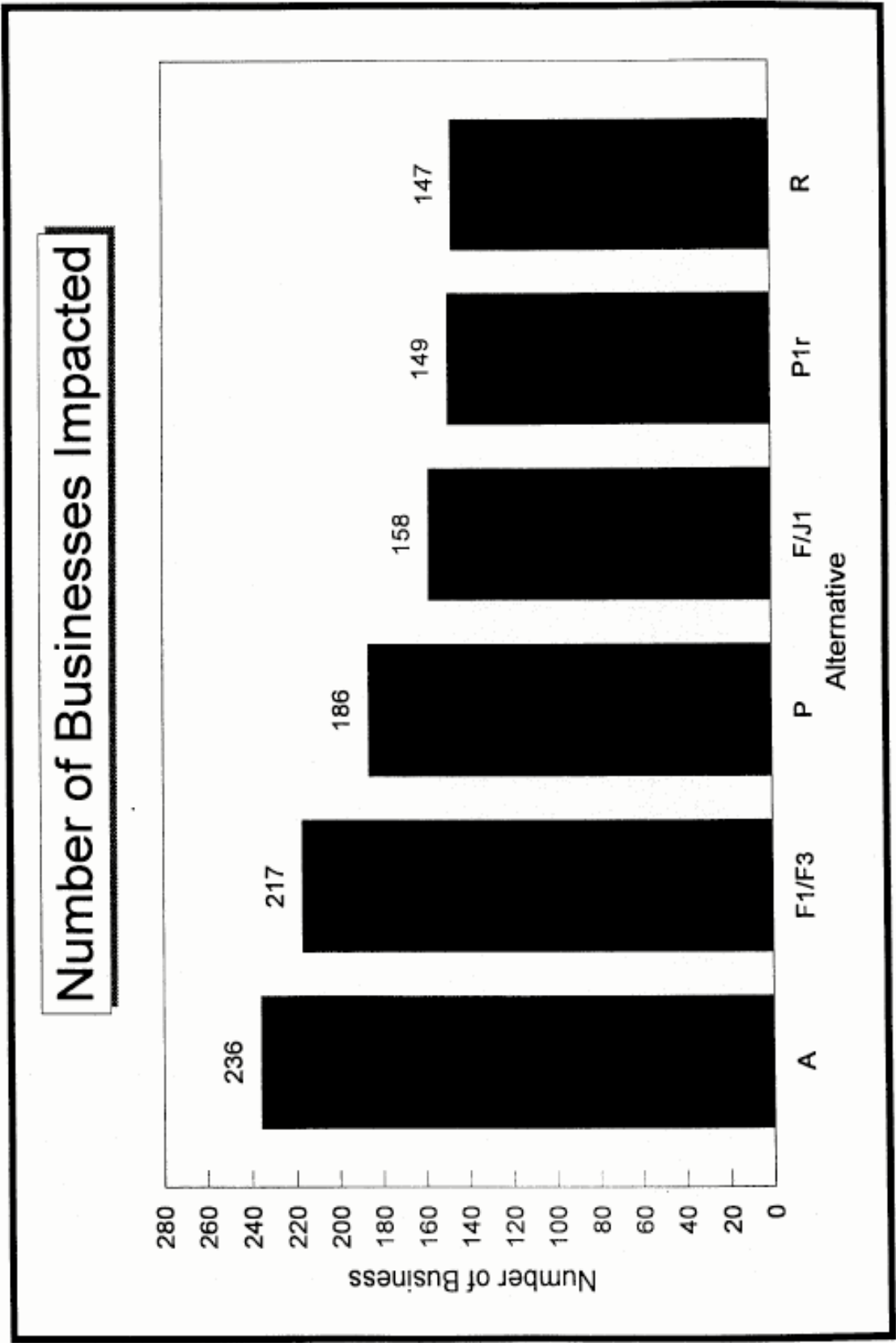
(Page 1-7)

**Design Year 2020**

Alternatives R, P1r, and F/J1 will impact the least amount of businesses - between 147-158. Conversely, Alternative A will have by far the greatest impact on the local economy at 236 businesses impacted and approximately 1,370 jobs temporarily or permanently impacted.

**Long Range Planning (2030-2050)**

When planning transportation routes for the business community, we must consider the needs of emerging commercial centers in the County. For example, the Allendale, Coopersville, Zeeland and Holland areas are experiencing tremendous economic growth that is projected to continue well into the future. These areas will have an increased need for an uninterrupted north-south route to serve their commercial districts in the most efficient manner possible.



**FARMLAND****Numerical Ranking Of Choices For The Best Alternative**

Alternatives	Acreage of Farmland Lost	Ranking
P1r	92	1 (First)
P	92	1
R	135	2
A	169	3
F1/F3	462	4
F/J1	830	5 (Last)

(Pages 5-34, 5-36)

**Design Year 2020**

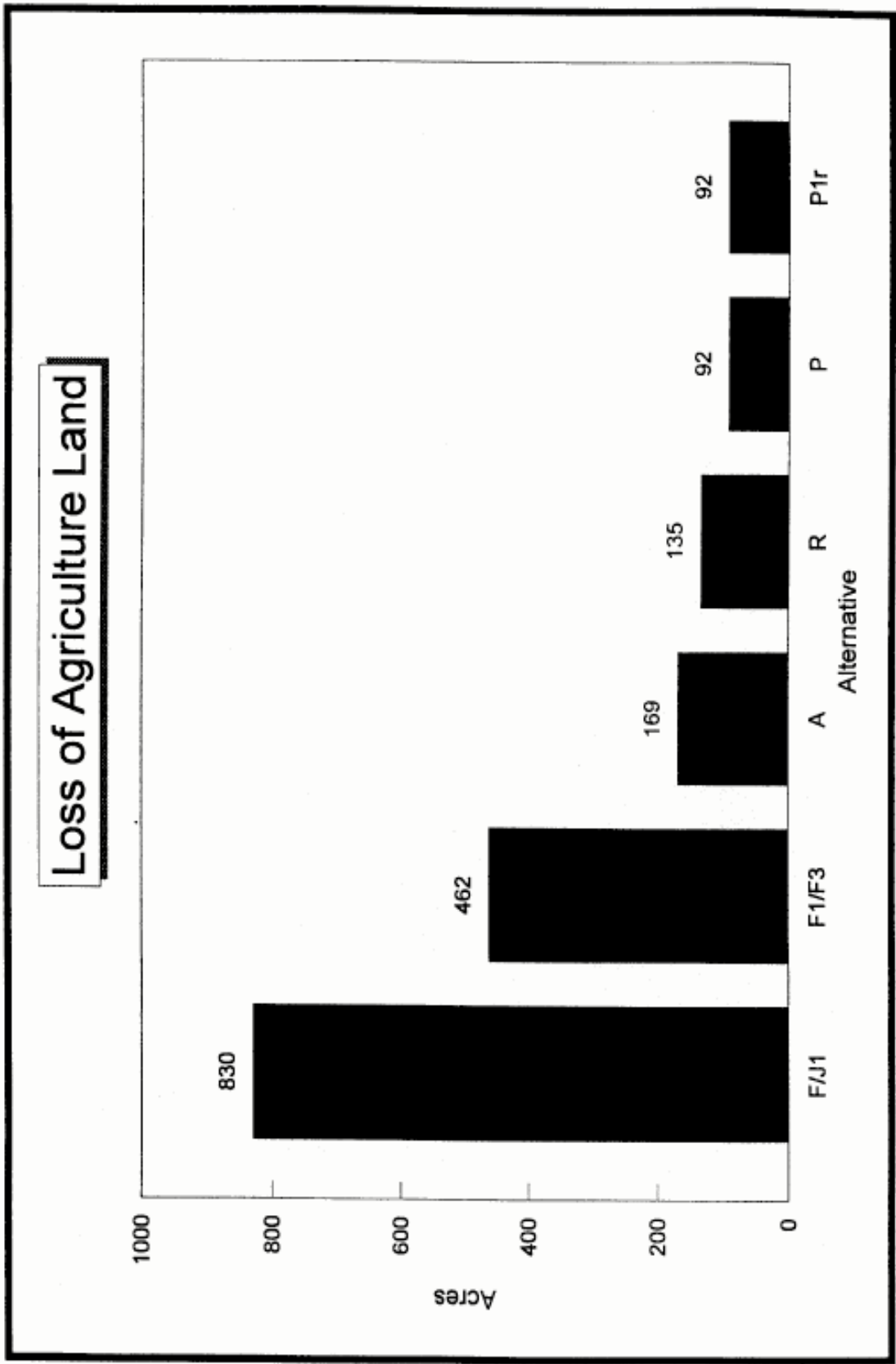
According to the DEIS, Alternative R will have minimal impact to farmland from construction due to its location on the existing alignment of 120th Avenue. However, this alternative is an improved road with unlimited access and it is the Department's belief that this alternative will incite the most pressure for development. For this reason, this alternative will likely have the most detrimental impact to farmland in the long term. Alternative R, P1r, P, and Alternative A all have minimal impact to farmland in Design Year 2020. However, it is the belief of the Planning Department that Alternative A will have such a negative impact on the character of the Holland and Grand Haven communities that it could prompt a wave of flight to more rural areas of the County.

According to MDOT estimates, Alternative F/J1 will consume approximately 830 acres of farmland. It is important to note that this represents approximately 0.0059 of the total Prime Farmland and 0.0019 of the total Unique Farmland in the study area. Additionally, according to the Water Resources Institute of Grand Valley State University Analysis of Land Use, the projected loss of agricultural land due to residential development is projected to be 17,332.5 acres countywide by the year 2020. The amount of residential growth projected for Ottawa County cannot occur without substantial changes to the existing landscape.

In 1978, agriculture accounted for 55% of land use in Ottawa County. By 1992, the percentage had dropped to 47%. This translated to a loss of 27,947 acres or 44 square miles. From 1978 to 1992, approximately 3 square miles per year were converted from agriculture to some other use. Alternative F/J1 will consume approximately 45% less farmland than that which will be lost during any given year due to the natural development of the County.

**Long Range Planning (2030-2050)**

A highway itself will not harm agriculture in Ottawa County in the long term. That can only come from local units of government approving rezoning requests prompting unchecked growth. The loss of farms from continuing residential development can be best managed through concerted efforts by local units of government.



**ENVIRONMENTAL****Numerical Ranking Of Choices For The Best Alternative**

Alternatives	Acreage of Wetland Lost	Ranking
R	48	1 (First)
A	54	2
F1/F3	59	3
Plr	61	4
P	61	4
F/J1	90	5 (Last)

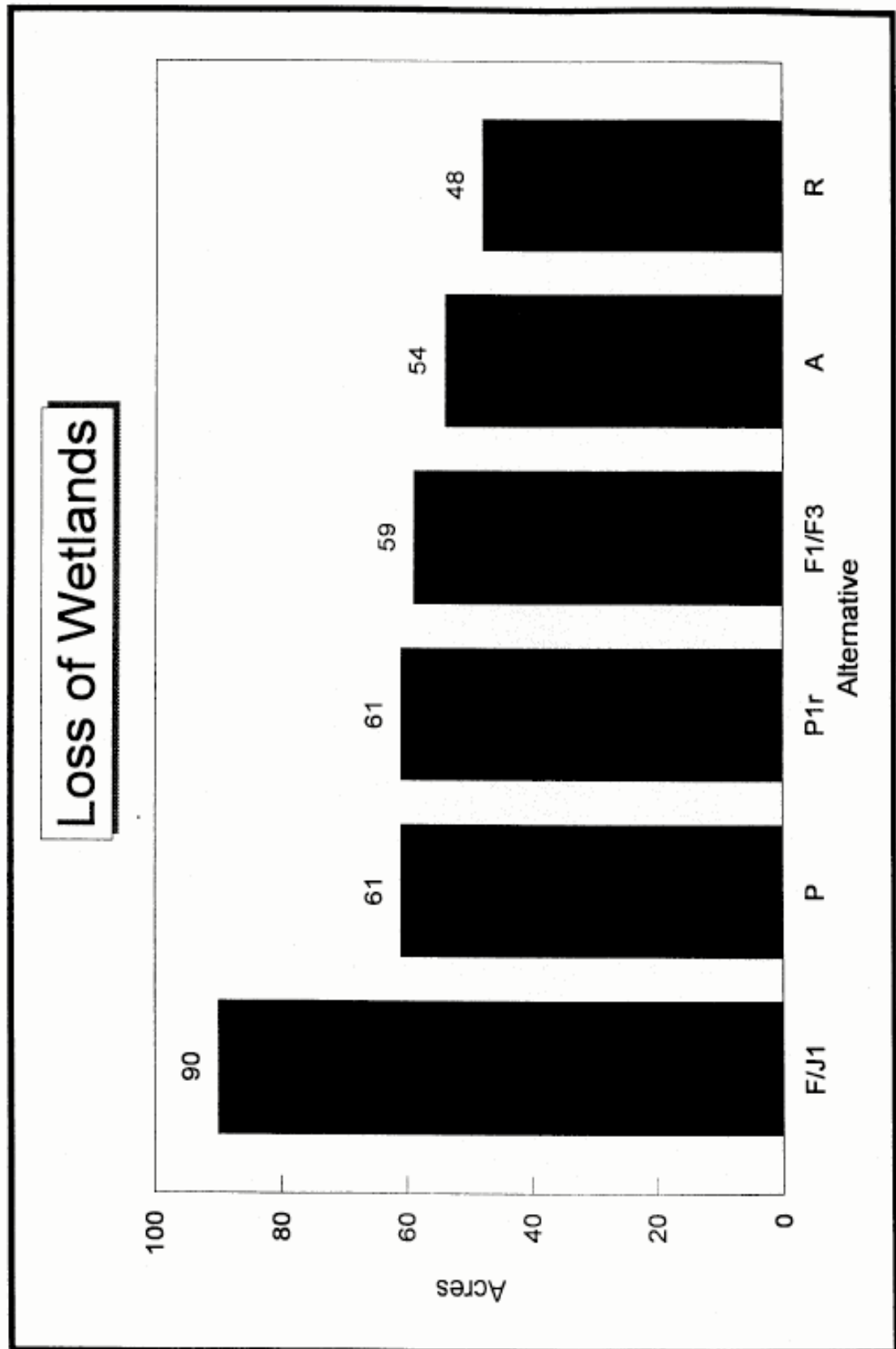
(Page 5-65)

**Design Year 2020**

If a decision was made based solely on wetlands, Alternative R will have the least impact to Wetlands in design year 2020. However, since it is standard policy of the MDEQ to mitigate any disturbance to existing wetlands at a ratio of 2:1 (meaning that two acres of wetlands must be created for every 1 acre disturbed) for forested wetlands and 1.5:1 for shrub and emergent wetlands, any wetlands that are disrupted during the construction of any of the alternatives will be more than accommodated for. Any of the alternatives will have an effect on wetlands, but the effects will be mitigated.

**Long Range Planning (2030-2050)**

According to the DEIS, any disturbances to the natural environment as a result of any of the alternatives will be very minor and can be further minimized through route selection, vegetation management, and engineering design features. In addition, the DEIS states that the freeway options may have a positive effect on air quality because they will allow vehicles to travel more efficiently thereby reducing idling which greatly contributes to air pollution. There may also be a corresponding reduction in energy usage.



### **SECONDARY IMPACTS**

Ottawa County is experiencing tremendous growth that is predicted to continue well into the future. The 1997 Census counted 220,403 people in Ottawa County, and the projection for 2020 is 338,450 - an increase of 54%. Allegan County will grow by 23% and Muskegon County by 11%. Such regional growth will have a direct effect on future transportation needs in the County.

It is the belief of the Planning Department that Alternative R will have the most detrimental secondary impacts based on the fact that this alternative will transform 120th Avenue into a unlimited access boulevard. By not controlling access into the community, development is free to spring up all along the improved corridor. With the infrastructure in place and an increased volume of traffic utilizing the route, it will be a prime location for strip malls, subdivisions, gas stations, and fast food restaurants. Conversely, a freeway with controlled access will experience most development pressure at access ramps; and this development can be controlled or restricted through zoning by the local unit of government.

Concern has been raised over the fact that the Ottawa County Development Plan discourages major road improvements into rural areas. It is important to note that this plan was written in 1992 making it 7 years old. It must be conceded that the Planning Department and Planning Commission have been neglectful in updating the document. At the time this document was written, assumptions and recommendations were made based upon the best information that was available at the time. The Planning Department now has the benefit of a comprehensive Environmental Impact Statement containing crucial information needed to make an informed decision.

Michigan State law dictates that local governments are responsible for determining land use policies and zoning ordinances for their jurisdictions. Therefore, concerns about long term changes in land use need to be appropriately addressed by the various local governments within the US-31 alternative corridors. In 1990, the US Census counted 187,768 people in 66,624 housing units in Ottawa County. However a build out analysis of existing zoning showed that

local zoning could accommodate 782,309 people in 269,762 housing units. Furthermore, a build out analysis of future land use in Master Plans shows that there will be zoning for 971,852 people in 335,121 housing units. These numbers clarify the fact that local zoning will determine the secondary impact of any decision. Nearly 90% of the total land in the county is zoned or planned for residential uses of varying densities. Similarly, the county is currently zoned for 7,780 acres of commercial development.

**SELECTION OF PREFERRED ALTERNATIVE**

By carefully analyzing each of the Alternatives by category, it is clear that the best choice to alleviate traffic and safety problems is Alternative F/J1. F/J1 involves the construction of a new limited access freeway bypass around the east and north sides of the Holland/ Zeeland area, a new limited access freeway east of existing US-31 from just north of Holland to I-96, and a controlled access boulevard along existing US-31 from I-196 to M-104. The new freeway will provide two lanes of uninterrupted travel in each direction, and the boulevard on existing US-31 will provide three lanes of travel in each direction in urban areas and two lanes of travel in each direction in rural areas. It will also provide a new bascule or fixed span bridge in Grand Haven.

Alternative F/J1 is the only option that will operate at a Level of Service (LOS) of A or B and it diverts the greatest amount of traffic off the existing alignment. It is a centrally located, uninterrupted, limited access freeway that is specifically designed to move large amounts of traffic in a safe and efficient manner. Although transportation and safety are by far the most important considerations when selecting a preferred alternative, they are not the sole considerations. The cost to construct Alternative F/J1 is within 1.7% of the other freeway alternatives and has a rate of return on investment of greater than \$1.00. Additionally, the tax base loss from Alternative F/J1 is approximately \$1.8 million less than the alternative with the greatest tax base loss. With the exception of Alternative R, all the options are relatively close in the number of residences impacted - between 183 and 211 residences. Alternatives R, P1r, and F/J1 will impact the least amount of businesses - between 147-158. Although Alternative F/J1 disrupts the largest amount of farmland, farmland is already being impacted by growth, and this alternative represents a loss of only 0.0059 of the total Prime Farmland and only 0.0019 of the total Unique Farmland in the study area. Projections also show that this land is susceptible to urban influence with or without a highway. Last, all of the alternatives have an impact on wetlands although any impacts will be mitigated.

It is also the Planning Department's recommendation that improvements be made immediately to the existing US-31 alignment in the form of Transportation System Management. Further, the Department recommends that another bridge be constructed across the Grand River at 120th

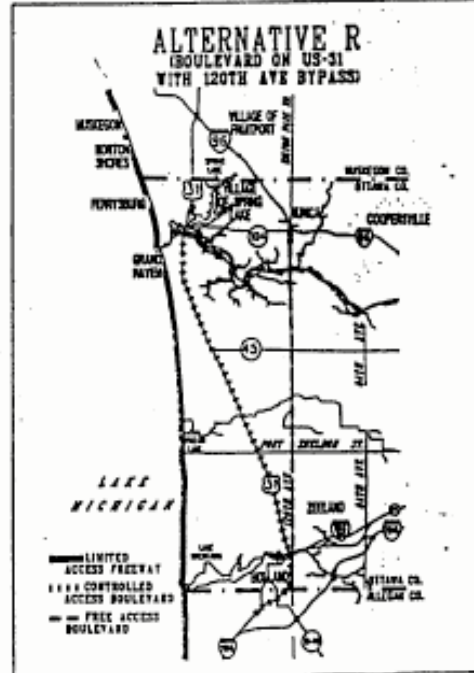
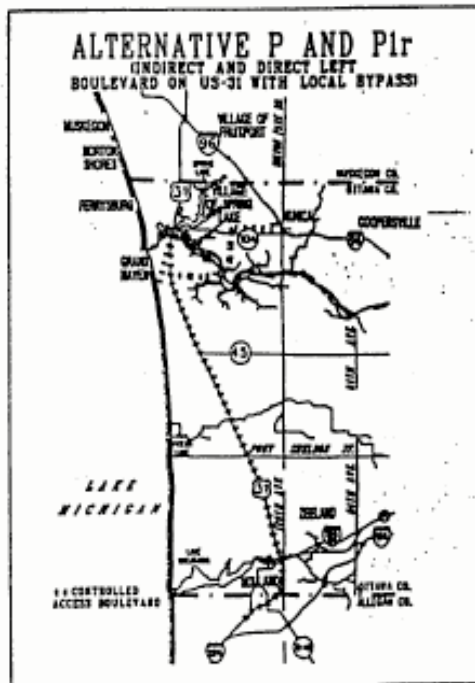
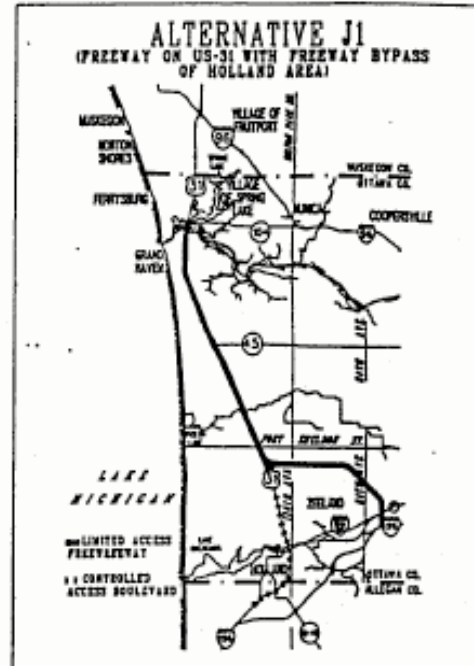
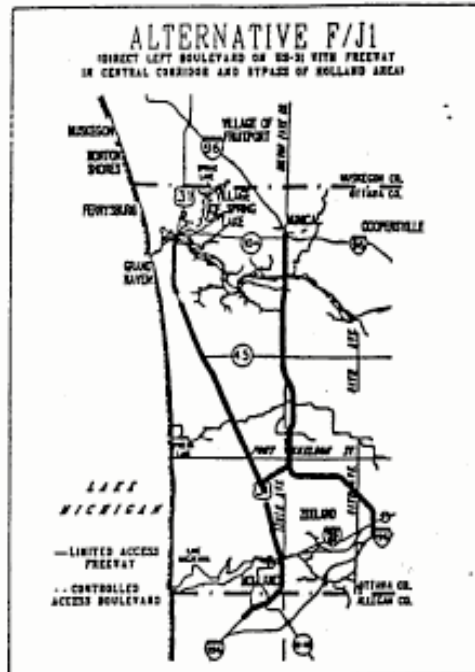
Avenue. The construction of a two-lane bridge should begin immediately with foundations that are adequate to build a four-lane freeway.

### **CLOSING**

Under any proposal chosen as the preferred alignment, the Ottawa County Planning Department, on behalf of the Planning Commission and Board of Commissioners, is committed to coordinating efforts to minimize the effects that the final chosen route will have on local communities. These efforts should include joint meetings between local, County, and State officials to discuss street access, freeway ramps, buffers, and other design considerations. Other efforts will be made to assist with general land use planning, design charrettes, strategic planning, and changes to Master Plans and Zoning Ordinances.

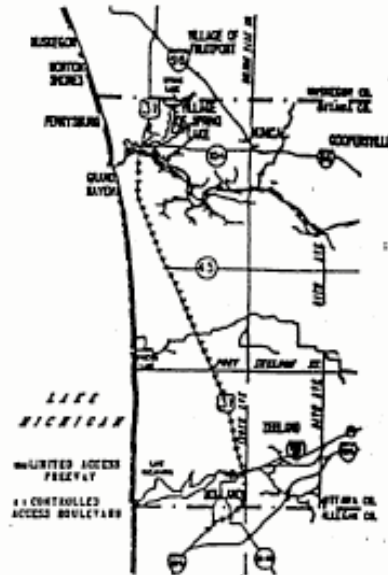
The Planning Department is also committed to assisting with the potential implementation of constructed wetlands technology that they have been demonstrating to minimize the effects of stormwater runoff and will work with interested communities to implement concepts and programs to promote rural preservation or urban vitality - whichever the case may be. The Planning Department will also assist communities in obtaining financial assistance from MDOT and other funding sources to implement these initiatives.

# US-31 LOCATION DESIGN STUDY MICHIGAN DOT

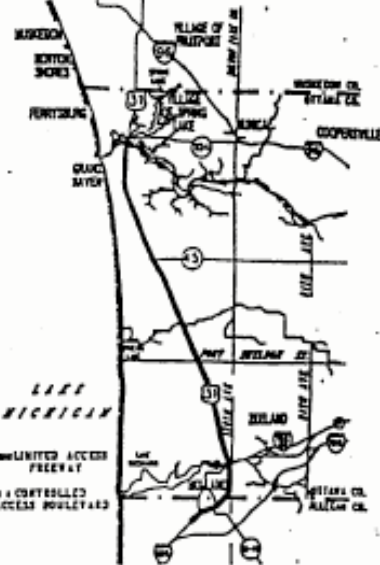


# US-31 LOCATION DESIGN STUDY MICHIGAN DOT

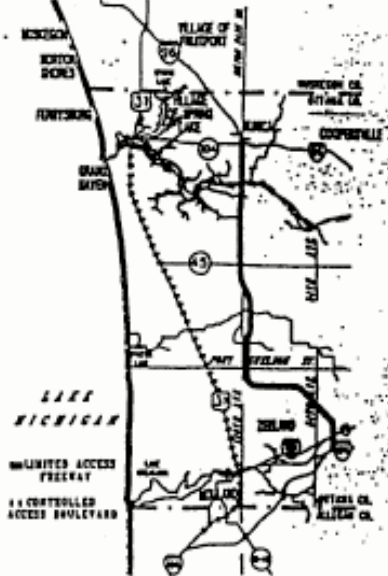
## 2005 & 2020 TSM ALTERNATIVES



## ALTERNATIVE A (FREEWAY ON US-31)

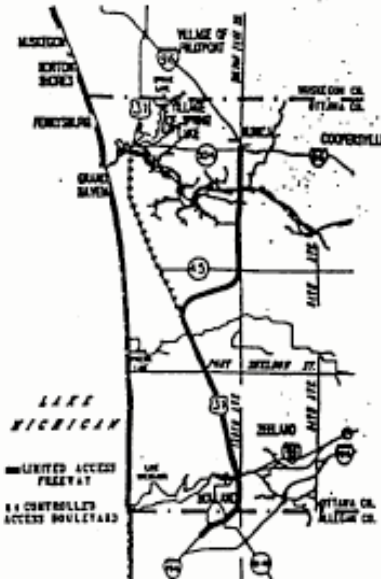


## ALTERNATIVE F (DIRECT LEFT BOULEVARD ON US-31 WITH FREEWAY IN CENTRAL CORRIDOR)



## ALTERNATIVE F1/F3

(DIRECT LEFT BOULEVARD AS US-31 SOUTH OF PIGEON RIVER WITH  
FREEWAY ON US-31 TO SOUTH AND FREEWAY  
IN CENTRAL CORRIDOR TO NORTH)



Alternatives	Amount of Traffic Diverted	Ranking
Plr	17,400	1 (First)
P	17,400	1
F/J1	13,400	2
F1/F3	13,400	2
R	8,000	3
A	NA	4 (Last)

Alternatives	Number of Major Impacted Residences	Ranking
R	36	1 (First)
F1/F3	96	2
F/J1	111	3
A	111	3
P	129	4
Plr	142	5 (Last)

Alternatives	Number of Major Impacted Businesses	Ranking
Plr	35	1 (First)
F/J1	38	2
P	53	3
R	74	4
F1/F3	85	5
A	113	6 (Last)

Alternatives	Number of Total Major Impacted	Ranking
R	116	1 (First)
F/J1	183	2
Plr	190	3
P	194	4
F1/F3	201	5
A	240	6 (Last)

**Ottawa County Board of Commissioners, January 27, 1999, US-31 Staff Position Paper**

1. Acknowledged receipt of Ottawa County's "US-31 Staff Position Paper", dated January 22, 1999, which supports F/J-1. No response required. The current Preferred Alternative includes critical segments of Alternative F/J-1.

### JOINT RESOLUTION TO MDOT

**WHEREAS**, the communities of Ferrysburg City, Grand Haven Charter Township, Grand Haven City, Spring Lake Township and the surrounding environs will be significantly impacted by the eventual location of the U.S. 31 improvements; and

**WHEREAS**, creation of an elevated freeway, surface freeway, or an expanded boulevard through the communities where the existing U.S. 31 now exists will eliminate jobs, impact churches, weaken neighborhoods, threaten park areas, affect community heritage and reduce property values in amounts totally unacceptable to the 30,000 plus area residents; and

**WHEREAS**, the governing bodies of Ferrysburg City, Grand Haven Charter Township, Grand Haven City and Spring Lake Township have each gone on record requesting a U.S. 31 by-pass with a Grand River crossing elsewhere so as to provide an alternate route across the Grand River to more effectively carry the current 58,000 daily vehicles and the 40,000 additional vehicles expected in the next twenty years; and

**WHEREAS**, such alternate route will protect the lives of our citizens, protect the economic viability of our employers, improve traffic flow for regional and state travelers alike and preserve our communities' neighborhoods, institutions and history;

**NOW, THEREFORE, BE IT JOINTLY RESOLVED** that the communities of Ferrysburg City, Grand Haven Charter Township, Grand Haven City and Spring Lake Township are committed to a long-term solution to the U.S. 31 problems, specifically:

1. We continue to support the construction of a by-pass at, or near, 120th Avenue with a Grand River crossing in a manner which most effectively connects the Holland region to the Muskegon region such that regional and state traffic can quickly, safely and less obtrusively reach their destinations.
2. We are disturbed about the unilateral action by MDOT and MDEQ to eliminate the southern spur of former Alternative F that crosses the Pigeon Creek prior to a review in the Environmental Impact Statement due later in 1997, and we hereby request reinstatement of Alternative F as a full option to be researched just as thoroughly as any other option in the Environmental Impact Statement.
3. We are of like mind that the best long term option, with the greatest transportation benefits, is the July, 1996 version of Alternative F, coupled with Alternative J1, to provide a direct interstate link along the shortest route possible between I-196 in Zeeland and I-96 in Nunica. Such transportation benefits justify the increased environmental mitigation costs associated with crossing the Pigeon Creek.

4. This resolution substantially states the best long-term option desired by the region. All resolutions in conflict herewith, in whole or in part, are hereby revoked to the extent of such conflict.

Respectfully submitted this 10 day of Oct, 1997.

The undersigned Mayor of the Governing Body of the City of Ferrysburg

Wm S. Herbst

The undersigned Mayor of the Governing Body of the City of Grand Haven

Paul M. Ringelberg

The undersigned Supervisor of the Governing Body of Grand Haven Charter Township

John Nutter

The undersigned Supervisor of the Governing Body of Spring Lake Township

James A. Jolani

cc: Ottawa County Board of Commissioners  
Ottawa County Road Commission  
Robinson Township  
Grocery Township  
City of Holland  
City of Zeeland  
ACI Transportation Committee  
U.S. Coast Guard  
Village of Spring Lake

Governor John Engler  
Leon Stille, Senator  
William Van Regenmorter, Senator  
Jon Jellema, Representative  
Jessie Dalman, Representative  
James Agee, Representative  
Paul Baade, Representative  
Patricia Birkholz, Representative

clomul 20th.wpd

Minutes of a Regular Meeting  
of the  
Spring Lake Township Board of Trustees  
December 13, 1993 - 7:30pm

The meeting was called to order by Supervisor Lloyd A. Warners at 7:30pm at the Spring Lake Township Hall, 106 So. Buchanan Street, Spring Lake, Michigan.

Present: Lloyd A. Warners, Supervisor; Mary Ann Willoughby,  
Clerk; Victoria Beauregard, Treasurer; Trustees Frederick Peterson,  
Gordon Timmerman, Lawrence Mierle, and James Jeske.

Absent: None

The prayer for guidance was offered by Supervisor Warners followed by the Pledge of Allegiance.

Motion by Peterson and seconded by Mierle to approve the agenda as presented. Ayes: Unanimous. (Motion carried)

Motion by Beauregard and seconded by Timmerman to approve the Consent Agenda as presented with bills totaling \$125,427.67 which include a check in the amount of \$17,500 payable to the Spring Lake Township Building Authority. This amount represents the grant money received from Department of Natural Resources, Inland Fisheries Division. Ayes: Unanimous. (Motion carried)

Motion by Timmerman and seconded by Mierle to open the public hearing for consideration of the establishment of a Special Assessment District for the paving of Central Avenue. Motion by Peterson and seconded by Mierle to close the public hearing. (Roll call vote.) Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle, and Jeske. Nays: None. (Motion carried)

Motion by Willoughby and seconded by Timmerman to direct the supervisor and clerk to execute the resolution to establish the Special Assessment District for the paving of Central Avenue. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle, and Jeske. Nays: None. (Motion carried)

Motion by Mierle and seconded by Beauregard to approve the Resolution of Consent for transfer of employment to the City of Norton Shores for Dynamic Conveyor Corporation. (Roll call vote.) Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle, and Jeske. Nays: None. (Motion carried)

Motion by Willoughby and seconded by Beauregard to direct the township supervisor to proceed with the sale of up to two acres of Roossien property to Cassell Dance Studio within the price range of \$15-18 thousand per acre. The property will be covered by covenant similar to the Rules and Regulations established for Spring Lake Township industrial parks. This property must be rezoned to Commercial from Industrial to allow it to be used for this purpose. Discussion ensued regarding the application to be considered by the Planning Commission for rezoning of the entire frontage to be rezoned for commercial. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, and Jeske. Nay: Mierle. (Motion carried)

Mrs. Willi Postma appeared before the board. Mrs. Postma represents Hopkins Development Company. This company is in the process of appearing before the Planning Commission to outline their proposal for building a subdivision at the corner of 148th and Boom roads. Mrs. Postma and members of the development company, neighborhood residents, and Mr. Ted Bosgraaf, the developer also spoke regarding use of the property formerly owned by the late Albert Hopkins. Mrs. Postma offered information regarding the development of the property on the north side of the road for housing and the south side of the property being dedicated as park land. Motion by Jeske and seconded by Timmerman that the Board of Trustees go on record as being in opposition to all and any river crossing at 144th and/or 148th (known as Corridor B of the U.S. 31 Corridor Study by M-DOT) or anywhere in Spring Lake Township to be used as a bypass (corridor) or

Page Two.

Minutes of the Spring Lake Township Board of December 13, 1993

local bridge. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle, and Jeske. Nays: None. (Motion carried)

Motion by Peterson and seconded by Beauregard to approve the preparation of plans and specifications for improvements to the Spring Lake Sewer Pumping Station at a total cost of \$140,580. The township's share is 50% and will be paid from Water and Sewer Fund balance.

Motion by Peterson and seconded by Mierle to nominate Bud Bleyaert as the North Bank representative to the ACI Land Development Corporation Board of Directors. Length of term will be determined by the by-laws being drafted for this corporation. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle, and Jeske. (Motion carried)

Motion by Peterson and seconded by Willoughby to adopt the resolution to support the participation of the Fire Chief or his designee on the Public Services Subcommittee of ACI. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman. Nays: Mierle and Jeske.

#### Clerk's Report

1) Clerk authorized the use of the SWAP (Sentence Work Abatement Program) of Ottawa County Community Corrections Department for cemetery cleanup. Workers and a supervisor were paid at the rate of \$2/hour and worked 472 1/2 hours. Willoughby expressed appreciation to Community Corrections for this program and the services provided.

2) EARS (Environmentally Alert Resource Supporters) met on November 22. Elinor Wiersma is the new chairperson.

3) Announcement was made of the Christmas Lighting Contest the North Bank Business and Professional Association is sponsoring.

#### Attorney's Report

1) Proposed State Bid rules were discussed. New wording will be forthcoming.

2) Department of Public Works on call definition and pay scale was discussed.

Attorney reviewed the personnel policy and advised that policy is being administered correctly.

#### Recreation Report

Jeske advised that Recreation Committee was meeting December 14. Discussion ensued on the grant announced by the Chronicle of \$250,000 for Rycenga Park. As of today, no official information has been received by the township.

#### Supervisor's Report

1) Motion by Beauregard and seconded by Peterson to bring back to the table the Health Insurance Options which were tabled at the November meeting. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

2) Motion by Timmerman and seconded by Peterson to adopt resolution to allow an employees to opt out of the Health Plan offered by the township once a year. Fifty percent of the total amount normally contributed by the township, for the employee's specific plan, will be contributed to another tax exempt township plan. Employee must present an alternate proof of insurance. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

3) Motion by Mierle and seconded by Willoughby to participate in a Voluntary Group Life Insurance program which will allow employees to purchase additional life insurance if they desire. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

4) Supervisor Warners announced the Warner Baird Library Grant Request for one-half of Phase I Schematic Drawing for the expansion of the Warner Baird Library, has been approved by the Loutit Foundation.

5) Motion by Jeske and seconded by Beauregard to authorize the Supervisor and Clerk to sign the Cable Television Franchise with C-Tec. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

6) Motion by Willoughby and seconded by Jeske that the township not participate in the Jaycees Christmas Tree Disposal project this year due to lack of utilization of this service by township residents. It was estimated that only 20 residents used this service and

Page Three.

Minutes of the Spring Lake Township Board dated December 13, 1993

the cost was \$300. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

7) Motion by Jeske and seconded by Peterson to deny a request from the American Red Cross for a donation of \$500. Ayes: Warners, Beauregard, Peterson, Timmerman, Mierle and Jeske. Nay: Willoughby. (Motion carried)

8) Motion by Mierle and seconded by Peterson to begin the reverter process on land purchased by Lee Kihnke for Magnum Packaging, Inc., per the Spring Lake Township Industrial Park Covenant. Mr. Kihnke has failed to build on the land in the time specified per our covenant. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

9) Discussion ensued regarding the Spending Authority Resolution. A new resolution will be drawn to encompass additional funds i.e. salaries and payroll, water purchases, sewage treatment payments, and debt service payments.

10) Motion by Willoughby and seconded by Peterson to change the January 10, 1994 meeting to January 17, 1994 at 7:30pm. Ayes: Warners, Willoughby, Beauregard, Peterson, Timmerman, Mierle and Jeske. (Motion carried)

Meeting adjourned at 9:50pm.

Respectfully submitted,

  
Mary Ann Willoughby  
Spring Lake Township Clerk

**City of Ferrysburg, Grand Haven Township, the City of Grand Haven, and Spring Lake Township, 1997**

Acknowledged receipt of their joint resolution of support for a bypass alternative including a Grand River crossing near 120th Avenue. No response required. The current Preferred Alternative includes a new route and river crossing in the vicinity of 120<sup>th</sup> Avenue.



## CITY OF FERRYSBURG

408 FIFTH STREET, P.O. BOX 38  
FERRYSBURG, MI 49409-0038

PHONE 616-842-5803  
FAX 616-844-0200

January 20, 1999

Mr. José López  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

**RE: US-31 Draft Environmental Impact Statement  
Between I-196 and I-96  
State No. 33955, Federal No. DPR 0045 (001)**

Dear Mr. Lopez:

The Ferrysburg City Council has reviewed the US-31 Draft EIS. At its meeting on January 18, the Ferrysburg City Council authorized me to submit to you the following comments regarding proposed improvements to and/or relocation of US-31.

1. **We strongly prefer Alternative F/J1.** We believe this is the best alternative because:
  - a. It is a true limited-access freeway which will allow traffic to move efficiently and safely.
  - b. It is a more direct North-South, South-North route for through traffic.
  - c. It provides a second bridge-crossing of the Grand River in closer proximity to Ferrysburg/Grand Haven than the current 68th Avenue bridge in Allendale.
  - d. It would divert the most traffic from the current road.
  - e. It would provide the highest Level of Service (LOS) for the longest time.
  - f. It is most responsive to the anticipated transportation needs created by current and expected Ottawa County growth patterns.
  - g. It avoids imposing unacceptable negative impacts along existing US-31 in Ferrysburg and Grand Haven.
  - h. It provides for the replacement of the existing bascule bridge with a new bascule bridge with 40' clearance.
2. **We oppose a new fixed span bridge with 65' clearance over the Grand River between Ferrysburg and Grand Haven.** Any alternative whose route is the current roadbed

Mr. Jose Lopez  
January 20, 1999  
Page Two

and which includes a new fixed span bridge with 65' clearance over the Grand River between Ferrysburg and Grand Haven adjacent to the current bascule bridge is unacceptable. Such an alternative would impose extremely negative impacts upon Ferrysburg and Grand Haven.

3. We encourage MDOT to explore and implement Transportation System Management initiatives on existing US-31 between Ferrysburg and Holland, but especially through Grand Haven. Locations of existing signals ought to be reviewed, the sequencing of signals ought to be improved, and speed limits ought to be reviewed.

Thank you for the opportunity to comment on the US-31 Draft EIS.

Sincerely,  
CITY OF FERRYSBURG



Dennis Craun  
City Manager

c: Sen. Leon Stille  
Rep. Jon Jellema  
Ryan Cotton, Grand Haven City Manager  
Andrew Lukasik, Spring Lake Village Manager

**City of Ferrysburg, January 20, 1999**

1. Acknowledged receipt of support for Alternative F/J1. No response required.
2. The Preferred Alternative does not include a replacement for the existing US-31 bascule bridge.
3. Transportation Systems Management (TSM) initiatives, including signal timing, have been implemented along existing US-31 and will continue to be explored as needs and opportunities develop. The PA will include widening on the existing boulevard section in the City of Grand Haven between Washington and Jackson streets, and a turning lane north of Jackson Street.



## CITY OF GRAND HAVEN

May 18, 1998

Jeff Saxby, Project Development Engineer  
Michigan Department of Transportation  
Design Division  
425 W. Ottawa  
Lansing, MI 48933

Dear Mr. Saxby:

This letter is written to communicate to you the joint position of the communities of the City of Grand Haven, Ferrysburg, Spring Lake Village, Spring Lake Township and Grand Haven Township regarding the three options recently presented: P1 (six lane boulevard with direct left turns), P1R (six lane boulevard with reduced median and road closures), and TSM (four lane boulevard with traffic enhancements that shut down selected streets).

The communities below reviewed these concepts and uniformly concur that taken alone, they do not address the county-wide traffic issue. None of these proposals reduce the traffic over one bridge in the northern portion of the county. None address the traffic issues of the southern end of the county. Given the growth of the county, another county-long north/south roadway will be needed to the east of existing US-31. Furthermore, none of the proposals presented relieve any traffic through Spring Lake Village or Spring Lake Township.

The five communities agree for safety and backup reasons, another bridge is needed immediately. Now that Federal ISTEA funding has been reauthorized, it should be built without delay.

The communities below are not in favor of any option which would restrict flow within our urban areas, anymore than what presently exists. Also these communities are not in favor of any option that does not address the bigger county-wide issues.

Michigan Department of Transportation has made proposals for either a freeway or divided boulevard to be built in the 120th Avenue area. MDOT should work with traffic data and the desired outcomes of the townships to determine which road is best for the future.

Significantly, the City of Grand Haven is taking steps on its own to improve traffic flow by studying the creation of a "Beechtree/Jackson Street Connector" that will facilitate north/south flow from Comstock to the US-31 bascule bridge. (Please remember that the

bascul bridge is not the impediment to traffic flow and the number of bridge openings have been drastically reduced. The real traffic flow impediment is the way that the Jackson/US-31 signal functions.)

5

The City of Grand Haven would also consider allowing MDOT to use the median for new or longer queuing lanes at cross streets.

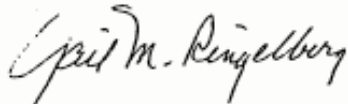
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Lastly, please know that last November at a joint public meeting including all the communities in northern Ottawa County, a consensus emerged for a new bridge located along the 120th corridor.

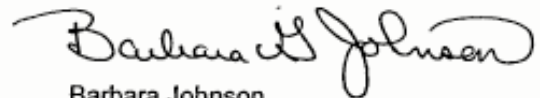
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For any additional information as to our joint positions, please see the attached resolutions from last year.

Sincerely,



Gail Ringelberg  
City of Grand Haven  
Mayor



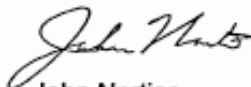
Barbara Johnson  
City of Ferrysburg  
Mayor



Lou Draeger  
Spring Lake Village  
President



James Jeske  
Spring Lake Township  
Supervisor



John Nortier  
Grand Haven Charter Township  
Supervisor

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**City of Ferrysburg, City of Grand Haven, Village of Spring Lake, Grand Haven Township, and Spring Lake Township Joint Letter of Concerns, May 18, 1998**

1. Acknowledge receipt of comment supporting a bypass. The Preferred Alternative addresses this concern.
2. Acknowledge receipt of comment on proceeding with construction ASAP. No response required.
3. Acknowledge receipt of comment on opposing alternatives that close local access to US-31 and county-wide issues. The Preferred Alternative addresses this to the extent feasible.
4. Acknowledge receipt of comment asking MDOT to work with rural townships to address their concerns. MDOT has worked closely with the Robinson and Crockery Townships and addressed many of the concerns related to proposed alignment of the M-231 new route and river crossing.
5. Acknowledged receipt of the proposed local road improvement (Beechtree/Jackson Street Connector). No response required.
6. Comment acknowledged. MDOT continued to work with the City of Grand Haven to use the median for adding lanes. This recommendation is included in the Preferred Alternative.
7. Acknowledged receipt of Tri-City community support for a 120<sup>th</sup> Avenue Grand River crossing. The Preferred Alternative includes a new river crossing in the vicinity of 120<sup>th</sup> Avenue.



## CITY OF GRAND HAVEN

August 20, 1998

Jeff Saxby, Project Development Engineer  
Michigan Department of Transportation  
425 W. Ottawa  
Lansing, MI 48933

Dear Jeff:

This letter is written to alert you to two facts regarding the alternative alignment studies to US-31.

First, the area known as "Old Kent Pond" directly west of US-31, north of the memorial bridge and south of the bascule bridge, in the City of Grand Haven is designated park land by the City of Grand Haven Master Plan. Attached is background information for your inclusion in the file.

Also, I have been thinking about your request for information on wetland mitigation areas that would assist in the environmental impact being reduced for the 120th option. Please know that the area known as "Rix Robinson Park" is generally wet, or could be more, and perhaps could be included as one area. It is directly east of US-31 between the memorial bridge and the bascule bridge. Also, the City of Grand Haven is creating an area of wetland, approximately 100 feet wide by 1,000 feet long directly west of the City's boat launch road on Harbor Island, which may be useful for you to consider, as well.

Please do not hesitate to contact me if I can provide any additional information.

Sincerely,

  
Ryan Cotton  
City Manager

cc: Gail Ringelberg, Mayor  
Members of City Council

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**City of Grand Haven, August 20, 1998**

1. According to a phone conversation with Mr. Chuck Bevelheimer on December 18, 2003, the piece of property located immediately west of the existing bascule bridge is not a park. Mr. Bevelheimer is the Director of Planning/Zoning and Inspection Services for the City of Grand Haven. According to the City of Grand Haven Community Park and Recreation Master Plan (January 1997 – December 2001), it is designated as a Natural Area.
2. Potential wetland mitigation sites have been identified and are referenced ..



## CITY OF GRAND HAVEN

December 8, 1998

Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

RE: Errors in Draft EIS and Questions

Dear Mr. Lopez:

This letter is written to identify factual errors in the Draft Environmental Impact Statement pertaining to the US-31 alternatives. Please correct them. Questions are also asked at the end.

1. **Old Kent Pond located on Harbor Island is officially designated in the City's Master Plan as parkland.** See attached correspondence which was sent to MDOT to correct this matter once before. The site is listed in the MDNR funded *Michigan Wildlife Viewing Guide*. This Island lies in the center of three major water bodies: Lake Michigan, the Grand River and Spring Lake. Its marsh areas provide food and resting areas for many species of migrating shore birds and waterfowl. See the Harbor Island Plan appendices on existing vegetation and the birds observed on Harbor Island. 1
2. **The East Side Historic District is incorrectly shown on pages 64 and 69 of the Cultural Resources Surveys section.** The correct map is attached showing that the west side of the district includes **all** the properties on US-31 between Pennoyer and Fulton and proceeds east to Beechtree. 2
3. On page 1-10, the DEIS asserts that the TSM Alternatives would not impact any natural areas. **This is false.** The 2020 TSM option creates a new bridge which destroys the edge of Old Kent Pond eastern area of Harbor Island which is designated as parkland and is in the MDNR's *Michigan Wildlife Viewing Guide*. 3

4. **The City's planned "local bypass" using a new Beechtree to Jackson "connector" street is not shown or discussed.** This new roadway will have a very positive effect of reducing traffic from Ferris to Jackson. See attached correspondence and diagrams. 4
5. **No changes to traffic at Jackson and Beacon appear to have been made to note the dramatic improvement expected when Meijer moves to Comstock.** This store is expected to generate the traffic flow on the attached report and can be subtracted from the congestion at Jackson. See especially page 19 of the attached report. The existing store is 160,000 square feet. The new store is 210,000 square feet and is expected to generate 1,000 trips per peak hour. It would seem that up to 760 trips during the weekday peak hour would be removed from the Jackson intersection as turning movements. The diagram attached shows that 63% of these trips will be originating south of Jackson and will not pass through the Jackson intersection.  
  
Would this reduction improve the level of service (LOS) at Jackson in year 2005 or 2020? A multi-screen theater is expected to be located at the current Meijer's site. This use will generate traffic primarily in the evenings and on weekends. 5
6. **The lost tax base analysis is understated in Table 5.1-6.** Lost tax revenue to the City, schools, county and other taxing units is \$792,000 per year. This lost tax revenue would be felt each and every year, **forever**. This loss is compounded by the loss of revenue sharing from the reduced population. See attached analysis. 6
7. On page 5-1, the report indicates there is no impact on neighborhoods by the TSM alternatives. **This is false.** THE 2005 TSM closes off Woodlawn, Waverly, Seventh and Monroe Street accesses. The 2020 TSM does the same, plus interferes with the City's plan to create an extended Olde Town neighborhood where the Road Commission is located now on Adams Street. The City has long planned to return this parcel to the tax roles. Such option takes this opportunity away from the community. The neighborhoods impacted are Olde Town and Washington Square. See their designation in the City's Annual Report as attached. 7
8. **Where is the Level of Service (LOS) intersection analysis for the year 2020 if alternatives F/J1 or R are built and P1r is not?** We believe it is significant to accurately determine the LOS at Jackson Street (and the lack of a need for P1r) once a bypass and second crossing is in place (as well as Meijer changes, Jackson/Beechtree connection is in place and through truck traffic is eliminated). 8
9. **All of the construction costs and various impacts need to be calculated showing the F/J1 and R alternatives when P1r is not included.** Given the traffic improvements of the changes in number 8 above, P or P1 may not be necessary. 9

10. **The mitigation section for institutions/governmental on page 6-3 should include a discussion on the lost taxable value, as corrected according to point number 6 above.** 10
11. **Harbor Island is not listed as a recreational area on Figure 4.9-1d and it should be.** (See point number 1 previously.) See also the Harbor Island Implementation Plan attached. 11
12. **The Table on 1.3-2 indicates no noise impacts on churches for the two TSM alternatives and A, P and P1r.** The reality is the New Apostolic Church (100 members) and St. Patrick's Catholic Church (4,000 members) are drastically impacted by each of these options. Alternative A builds to within 25 feet of St. Patrick's Church building, where their classrooms are located, and entirely destroys the New Apostolic Church. 12
13. **The same table indicates only one park is impacted by the above options.** The Harbor Island parkland area consisting of Old Kent Pond is impacted, as is Rix Robinson Park. Further, the tree-lined boulevard functions as an urban linear park/visual corridor enhancement for urban travelers and should be noted as an impact. 13
14. **Northbound Seventh Street appears to be closed off in every option.** It should be clearly shown when closed. Figure 3.3 - 4.24, for example. **This community will not consent to any such closure.** The Centertown Business District's vitality depends upon its use. 14
15. **The report does not address the greater impacts of larger trucks.** The report treats the impact of ten wheelers the same as cars. We believe that creating a Bypass 31 and a Business Route 31 will be very attractive for truck drivers for whom time, not distance, is of the essence. The data which determines the validity of treating trucks and cars as having the same impacts is not present. Neither are any projections on the number of trucks diverted by the bypass options present. 15

#### QUESTIONS

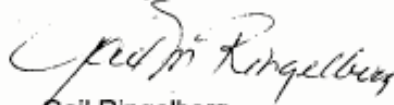
1. How much widening would be needed to the Business US-31 route if Alternative R were constructed according to the DEIS analysis? See 1.1.5 discussion on page 1-5. 16
2. What are the growth and traffic assumptions, including the forecasted travel for trucks, that is behind the numerous assertions that P or P1r is needed **even after** F/J1 or R bridges are built over the Grand River in the vicinity of 120th? 17

3. What are your traffic projections on Beacon when the impacts of correcting the errors pointed out in numbers 4 and 5 above are known?

18

This letter is written to respond to MDOT's request for public input and is in addition to two other letters from the City of Grand Haven (regarding the F/J1 terminus and all of the alternatives).

Sincerely,



Gail Ringelberg  
Mayor

on behalf of the City Council December 7, 1998

<p>cc: Jim DeSana, Executive Director*</p> <p>Bob Oosterbaan, Administrator, Ottawa County*</p> <p>Joe Haveman, Chair of Transportation and Land Use Committee*</p> <p>Denny Swartout, Ottawa County Commissioner</p> <p>Mark Knudson, Planning &amp; Grants, Ottawa County*</p> <p>Andy Lukasik, Spring Lake Village</p> <p>Dennis Craun, City of Ferrysburg</p> <p>Jim Jeske, Spring Lake Township</p>	<p>Bill Cargo, Grand Haven Township</p> <p>James Kirschensteiner, P.E. Federal Highway Administration</p> <p>James Steele, Division Administrator* Federal Highway Administration</p> <p>Jeff Saxby, Project Development Eng.*</p> <p>All the signers of other correspondence received concerning DEIS</p> <p>Soren Wolff, City of Holland</p> <p>Grand Haven City Council</p> <p>Ryan Cotton, City of Grand Haven</p>
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\* Letters include the referenced documents

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**City of Grand Haven, December 8, 1998**

MDOT received information from the City of Grand Haven on numerous issues and concerns. The city's key issues and concerns have been summarized below. The corresponding information from the City has not been included in this chapter. It was included in the January 31, 1999, US-31 Public Hearing Summary.

1. According to a phone conversation with Mr. Chuck Bevelheimer on December 18, 2003, the piece of property located immediately west of the existing bascule bridge is not a park. Mr. Bevelheimer is the Director of Planning/Zoning and Inspection Services for the City of Grand Haven. According to the City of Grand Haven Community Park and Recreation Master Plan (January 1997 – December 2001), it is designated as a Natural Area.
2. Receipt of historic district boundary map was noted. New districts and their boundaries have been noted in the FEIS **Section 4.16** and **Appendix A** only after they were determined to meet SHPO's requirements. There are no impacts to historic districts in the City of Grand Haven.
3. The current Preferred Alternative no longer impacts the Old Kent Pond
4. Acknowledge receipt of proposed local road improvement plan.
5. Acknowledge receipt of traffic study done for this location. The Preferred Alternative includes both MDOT and local road improvements for the US-31/Jackson Street intersection.
6. Acknowledged receipt of comment. No response required.
7. Acknowledged receipt of comment. Coordination with the City since the Public Hearing has continued. These discussions have led to the City of Grand Haven and MDOT's acceptance of scaled down approach for the planned existing US-31 (Beacon Boulevard) improvements within the City of Grand Haven. The improvements include adding a third through lane in the median in Grand Haven from south of Washington Street to north of Jackson Street.
8. Traffic was analyzed for the GrandWater Development and local road network improvements to address capacity concerns at Jackson Street. Model results show estimated diversions to the new route in the FEIS.
9. See comment #8 above.
10. Acknowledged receipt of comments. No response required.
11. According to a phone conversation with Mr. Chuck Bevelheimer on December 18, 2003, the piece of property located immediately west of the existing bascule bridge is not a park. Mr. Bevelheimer is the Director of Planning/Zoning and Inspection Services for the City of Grand Haven. According to the City of Grand Haven Community Park and Recreation Master Plan (January 1997 – December 2001), it is designated as a Natural Area. Further, this parcel is privately owned.

12. Acknowledged receipt of comments. The Preferred Alternative's noise analysis in **Section 4.7** indicates that no noise mitigation is required based on MDOT's current policy and federal guidelines.
13. Acknowledged receipt of comment. According to a phone conversation with Mr. Chuck Bevelheimer on December 18, 2003, the piece of property located immediately west of the existing bascule bridge is not a park. Mr. Bevelheimer is the Director of Planning/Zoning and Inspection Services for the City of Grand Haven. According to the City of Grand Haven Community Park and Recreation Master Plan (January 1997 – December 2001), it is designated as a Natural Area. While the tree-lined boulevard functions as an urban linear park/visual corridor enhancement, the boulevard has not been officially designated and zoned as park land.
14. Northbound Seventh Street will remain open with the Preferred Alternative (**Appendix A**).
15. Acknowledged receipt of comment. Truck diversion numbers from US-31 to the Freeway Connection are difficult to estimate and were combined with total traffic.
16. One additional lane in each direction would be needed between Jackson Street and approximately Washington Street to accommodate truck and auto traffic, see **Section 3.5.1** of DEIS.
17. Future year 2030 traffic volumes were provided by MDOT.
18. Revised estimated traffic volumes for the Preferred Alternative are shown on **Figure 3.2-9** of **Chapter 3**. Traffic counts were updated in 2007 which accounted for the redevelopment at the north end of the city and the former Meijer Store.



## CITY OF GRAND HAVEN

December 8, 1998

Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

RE: F/J1 Terminus

Dear Mr. Lopez:

This letter is written to suggest improvements to the F/J1 option.

The exit from northbound F/J1 at I-96 and M-104 appears convoluted if one wants to travel west to Spring Lake. See Figure 3.3-8.13.

The way it looks, someone would have to exit F/J1, onto eastbound I-96, exit I-96 at Nunica, proceed north on 112th Avenue and then turn left (west) on Pickle Factory Road until it connects to M-104 and proceed under the F/J1 option.

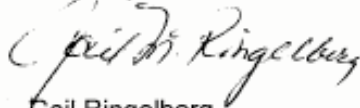
The total number of turning movements are five. Total distance out of the way is about 2.4 miles. In contrast, the total distance from I-96 to Spring Lake Village is only 6 miles. This interchange alone increases the distance to Spring Lake Village by 40%!

Another approach would be to exit from F/J1 on the exit ramp, then curve slightly left, (due north), to M-104 where a signal would control traffic movements. Total turning movements: 2. Total distance: 100 meters or 328 feet. See attached diagram.

This suggestion was previously made at the Zeeland open house review of the plans on August 27, 1998 and was placed in the suggestion box.

This letter is written to respond to MDOT's request for public input and is in addition to two other letters from the City of Grand Haven (regarding errors in DEIS and all the other alternatives).

Sincerely,



Gail Ringelberg

Mayor

on behalf of the City Council, December 7, 1998

cc:    Jim DeSana, Executive Director  
       Bob Oosterbaan, Administrator,  
         Ottawa County  
       Joe Haveman, Chair of Transportation  
         and Land Use Committee  
       Denny Swartout, Ottawa County  
         Commissioner  
       Mark Knudson, Planning & Grants,  
         Ottawa County  
       Andy Lukasik, Spring Lake Village  
       Dennis Craun, City of Ferrysburg  
       Jim Jeske, Spring Lake Township

       Bill Cargo, Grand Haven Township  
       James Kirschensteiner, P.E.  
         Federal Highway Administration  
       James Steele, Division Administrator  
         Federal Highway Administration  
       Jeff Saxby, Project Development Eng.  
       All the signers of other correspondence  
         received concerning DEIS  
       Soren Wolff, City of Holland  
       Grand Haven City Council  
       Ryan Cotton, City of Grand Haven

f:\omof\jtopt.1tr

**City of Grand Haven, December 8, 1998**

1. The proposed M-231 segment of the Preferred Alternative will have full access to M-104 and I-96. Specifically, it will include a signalized intersection with a direct left-turn from northbound M-231 to westbound M-104.



## CITY OF GRAND HAVEN

December 8, 1998

Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

RE: Alternatives, Impacts on Grand Haven and Phasing

Dear Mr. Lopez:

This letter is written by the City Council to underscore the apparent best option to select for the US-31 options in the Draft Environmental Impact Statement.

### Alternatives

We appreciated the depth and breadth of the DEIS's review of options. The strongest alternative for long-term connectivity is the F/J1 Freeway along 120th.

1

### Comparative Analysis of Strengths and Weaknesses

Although Alternative A through Grand Haven has the strength of using the existing alignment and having less wetland impacts, it creates tremendous impacts on the existing homes, businesses, churches and the overall community.

2

The greatest disparities in environmental impacts between Alternatives A and F/J1 appear to be related to noise and view. (The differences of impacts on wetlands and farmland is not as great as previously debated. Page 5-35 states "Based upon the calculated total point values, **none of the alternatives would have a significant impact to farmlands.**")

3

See the attached charts which graphically portrays the impacts.

## Mitigation

We view the best way to compare these impacts is to analyze the ways to **mitigate** the impacts.

For example, noise buffers can be installed for an additional one-time cost. Views can be improved by foresting the right-of-ways and using a variety of construction materials. (See the George Washington Parkway in Northern Virginia for a good example.) Urban sprawl can be contained by limiting exits to M-45 and I-96 only and purchase of transfer of development rights. Wetlands are mitigatable. Our community, for example, is willing to consider being taxed more to assist in mitigating environmental impacts.

Let's look at the reverse.

Even assuming that all displaced homes and businesses could be successfully relocated outside of Grand Haven, the mitigation for the lost tax base would be payments totaling **\$792,000 per year, every year, forever**. Which government taxing jurisdiction can make these payments? Our Public Safety Director believes a fire substation is needed on the east side of the highway if any of the options through Grand Haven come to pass. Who is going to fund this \$1,000,000 building and the extra personnel (\$100,000 per year) **forever**?

The cost/benefit ratios on page 5-106 needs to be re-worked to take this perpetual mitigation cost into consideration.

Further, how can any governmental entity successfully mitigate against regular maintenance traffic snarls or unplanned closures of the bascule bridge when substantially more traffic begins to be funneled into the bottleneck called Grand Haven? Witness the congestion this fall when US-31 was narrowed to two lanes for maintenance.

The region wants and needs another bridge!

## Costs

One trouble with F/J1 is it appears to be the most expensive. The inclusion of P1r with the F/J1 option overweights the costs for the F/J1 option. It is included because it is surmised that such traffic improvements will be required because not enough traffic will otherwise be diverted to F/J1. We contend the assumptions leading to this conclusion are false and incomplete:

1. The analysis does not account for Meijer moving to the south;
2. It does not analyze the benefits of the Beechtree/Jackson connector being planned by the City;
3. It ignores the expected diversion of through truck traffic to F/J1;

4

5

4. It ignores the need to recognize the existing route as a **business route** and let it function as one by permitting as many movements as possible (rather than eliminating them) which will have the impact of deterring thru traffic; and
5. It does not prove a need for P1r through an LOS analysis once the above errors are corrected.

5

**The DEIS should be reviewed to delete P1r costs from F/J1 and then compare the options.** This revision would eliminate segments W5 - W7 of P1r in the City of Grand Haven for a reduction in cost of at least \$168 million. (Table 3.6-8 on page 3-34). The resultant F/J1 cost then becomes \$419 million and becomes the lowest cost for all the new roadway options. The cost/benefit and ratios will correspondingly increase in return.

6

### **Business Route 31**

The current roadway fails because it is trying to function as **both** a local street as well as a thruway. The brightest transportation future for the region is to clearly **separate** these functions and aggregate them to whichever roadways are most capable of delivering the local and thruway benefits respectively.

7

The existing alignment is functioning well as a local street . . . allow it to further evolve in that direction without trying to stuff ten pounds of sugar into a five pound sack by changing the median to add through traffic capacity (TSM or P options). In turn, create a thru option that **ensures** it will not become clogged by local traffic over time by minimizing the exits to only **two**. This also is the best way to ensure long-term connectivity.

### **Population Growth Dictates Routes in the Center of the County.**

Every review of population growth shows substantial increase each decade for the foreseeable future, increasing to as much as 300,000 people in Ottawa County. This growth primarily emanates from the eastern townships and the Holland area and is converging toward the County's center. A corridor in the center of the county is needed to funnel this traffic to points north of the Grand River.

8

### **Concerns and Phasing**

One concept gained consensus when discussed with all the rural and urban communities together last fall... the necessity of another bridge crossing. Please set up a phasing plan whereby you construct a second bridge at 120th **first** and then improve the road accordingly at a later point. MDOT will then be able to assess the new bridge's real impacts on traffic (not assumed impacts) prior to any building on the current alignment.

9

Remember, that in the meantime, Grand Haven is working to do its share of traffic flow improvements. We are working on the Jackson/Beechtree connection to make a positive difference.

10

#### Immediate Improvement

An immediate improvement would be for MDOT to install an absolute state-of-the-art traffic controller at Jackson and Beacon and institute **reliable** traffic signal coordination along the corridor. If further lane construction occurs at this intersection, the City will participate as was done two years ago with the creation of a continuous right turn from Jackson to northbound Beacon.

11

#### Summary

Thank you for taking a broader and long-term view of this matter by imagining how best to improve "connectivity". This is why freeways were invented in the first place and replaced other modes of transportation. A freeway connection from I-196 to I-96 provides the **highest connectivity advantages**.

12

Please also consider how best to **mitigate the impacts** of whichever option is chosen. Please further remember the need for **redundancy** of another Grand River crossing to assure the least interrupted travel into the next century.

13

#### Conclusion

We will not sit idly by and let the existing inhabited areas be decimated. Attached are the previous resolutions of opposition enacted by the five communities on the Lakeshore. These resolutions support F/J1 as the best option.

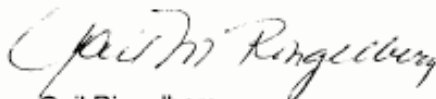
14

We are exhausted by the bridge break downs and maintenance in years past and will not let this opportunity pass without demanding a by-pass.

Let US-31 transition gracefully to what it is naturally evolving into... a business route.

This letter is written to respond to MDOT's request for public input and is in addition to two other letters from the City of Grand Haven (regarding errors in the DEIS and the F/J1 terminus).

Sincerely,



Gail Ringelberg

Mayor

on behalf of the City Council December 7, 1998

cc: Jim DeSana, Executive Director\*  
Bob Oosterbaan, Administrator,  
Ottawa County\*  
Joe Haveman, Chair of Transportation  
and Land Use Committee\*  
Denny Swartout, Ottawa County  
Commissioner  
Mark Knudson, Planning & Grants,  
Ottawa County\*  
Andy Lukasik, Spring Lake Village  
Dennis Craun, City of Ferrysburg  
Jim Jeske, Spring Lake Township

Bill Cargo, Grand Haven Township  
James Kirschensteiner, P.E.\*  
Federal Highway Administration  
James Steele, Division Administrator  
Federal Highway Administration  
Jeff Saxby, Project Development Eng.\*  
All the signers of other correspondence  
received concerning DEIS  
Soren Wolff, City of Holland  
Grand Haven City Council  
Ryan Cotton, City of Grand Haven

\* Letters include enclosures.

RDC:cal

Enclosure310pts 1/2

**City of Grand Haven, December 8, 1998**

1. Acknowledge receipt of comment and support for Alternative F/J1. No response required.
2. Acknowledge concerns related to Alternative A. No response required.
3. Acknowledge concerns related to Alternative A. No response required.
4. The widening of existing US-31 in the City of Grand Haven is confined to the segment south of Washington and north of Jackson Street. This widening will occur on the inside lanes and within the existing right of way. No commercial or residential displacement are anticipated. The current PA also includes a new crossing of the Grand River in the vicinity of 120<sup>th</sup> Avenue which will provide an alternative route for motorists to use to avoid congestion on the existing US-31.
5. The costs associated with each alternative are detailed also on **Table 1.3-1**. The Preferred Alternative, after modifications since the DEIS, is no longer the most expensive Practical Alternative.
6. Without improvements to Beacon Boulevard through Grand Haven, this alternative would not meet "Purpose and Need".
7. Comment acknowledged. No response required.
8. Comment acknowledged. No response required.
9. Comment acknowledged. Phasing of the current PA will occur in the following order:
  - New River Crossing in the vicinity of 120<sup>th</sup> Avenue
  - From the new River Crossing to the interchange with I-96/M-104
  - From the River to M-45
  - Improvements on existing US-31 in the City of Holland
  - Improvements on existing US-31 in the City of Grand HavenThe bridge at 120<sup>th</sup> Avenue and the associated bypass work are in the first phases. Work in the City of Grand Haven is the last phase of work in the Preferred Alternative.
10. Comment acknowledged. No response required.
11. Comment acknowledged. Signal progression through Grand Haven has been implemented since the DEIS.
12. Comment acknowledged. No response required.
13. Mitigation has been fully addressed in Chapter 5 of the FEIS.
14. Comment acknowledged. No response required. The current PA includes critical segments of F/J-1. Improvements within the City of Grand Haven were reviewed and supported by the Grand Haven City Counsel.



CITY OF GRAND HAVEN

Gail M. Ringelberg  
Mayor

January 22, 1999

Mr. Jose A. Lopez, Public Hearings Office  
Bureau of Transportation Planning  
Michigan Department of Transportation (MDOT)  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

The following governmental units have reviewed the Draft Environmental Impact Statement regarding the proposed routes for US-31. Following this review, we continue to support the position put forward in a letter dated May 18, 1998.

Please enter that correspondence in the official record as our collective response to the D.E.I.S.

Lou Draeger  
Village of Spring Lake  
President

James Jeske  
Spring Lake Township  
Supervisor

Barbara Johnson  
City of Ferrysburg  
Mayor

Gail Ringelberg  
City of Grand Haven  
Mayor

John Nortier  
Grand Haven Charter Township  
Supervisor

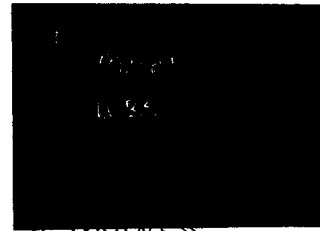
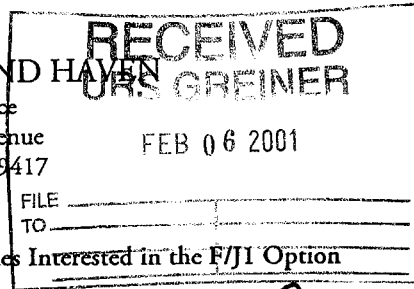
Sincerely,

  
Gail Ringelberg  
Mayor

**City of Grand Haven, January 22, 1999**

Acknowledge receipt of joint letter by Tri-City communities in support of Alternative F/J1. No response required. The current PA includes critical segments of F/J-1.

CITY OF GRAND HAVEN  
City Manager's Office  
519 Washington Avenue  
Grand Haven, MI 49417  
616-847-4888



TO: Parties Interested in the F/J1 Option

FROM: Ryan Cotton, City Manager  
rcotton@grandhaven.org

DATE: January 29, 2001

SUBJECT: City of Grand Haven Position on the F/J1 Option

Some individuals are not clear on the City of Grand Haven's position.

1. The City of Grand Haven supports the F/J1 Bypass beginning with a bridge at or about 120<sup>th</sup>. | 1
2. The City of Grand Haven does not support six (6) lanes through Grand Haven and the associated consequences. Rather, the City of Grand Haven believes these six (6) lanes can be forestalled, perhaps permanently, through the addition of a bridge at 120<sup>th</sup>; improvements to north / south traffic from the planned Jackson - Beechtree Connector; a reduction in curb openings; improvements in inter-county public transportation, etc. See position paper of February 14, 2000. | 2
3. The concept of a fixed span bridge is still under review by the City of Grand Haven. | 3  
Two members of Council support the Spring Lake Village position of an additional bridge at or around 144<sup>th</sup>. This position does not have a majority of City Council support at this time.  
It is not accurate that the City of Grand Haven wants another bridge at 144<sup>th</sup> at this time.
4. Any statements that the City of Grand Haven supports a bridge at 144<sup>th</sup> and a Jackson - Beechtree connector, instead of a bypass, are not factual. |

F:\user\CMO\FJ1 Position

**CITY MANAGER'S OFFICE**

CITY OF GRAND HAVEN  
"LAKE MICHIGAN'S BRIGHT SPOT"



**MEMO TO:** City Council

**FROM:** Ryan Cotton, City Manager

**DATE:** April 13, 2000

**SUBJECT:** Coordinated Response to MDOT regarding P-1r  
and the City of Grand Haven's vision for Business Route US-31

---

What follows is a coordinated response which was delivered at a meeting with MDOT and URS Greiner officials on April 13, 2000 with AGHAST in the Council Chambers. Mayor Lystra, Council Member Naser and Ryan Cotton, City Manager represented the City. (The underlined words represent changes that resulted from the discussions.)

**PRINCIPLES**

The City of Grand Haven is opposed to any impact which:

- |   |    |
|---|----|
| ■ Increases the sense of east/west separation or further restricts east/west flow.  | 4a |
| ■ Destroys the small town beauty and small town feel of the Boulevard.  | 4b |
| ■ Replaces the current bridge before it reaches its normally scheduled replacement date (year 2035).  | 4c |
| ■ Reduces access to the Downtown area from northbound Business Route US-31 traffic and/or reduces access to the Beechtree Industrial area from southbound Business Route US-31. | 4d |
| ■ Causes loss to waterfront property for permanent roadway purposes (such as what the P-1r plans would do to the Ottawa County Road Commission property).                       | 4e |
| ■ Creates major property losses on side street properties.  | 4f |

## PRE-CONDITIONS OF "TRIGGER POINT"

As a consequence, we cannot accept six-lanes being triggered through Grand Haven until all other possible alternatives are accomplished **to the maximum extent possible**, including but not limited to;

- |    |   |    |
|----|---|----|
| 1. | The new bridge and connecting bypass at 120th should be completed and be in operation for a minimum of two years.   | 5a |
| 2. | Assistance is provided to fund and construct the Beechtree/Jackson connector as an alternate north/south route.   | 5b |
| 3. | A continuous right turn from westbound Jackson northbound is created with the inclusion of an additional merge lane north of Jackson, as well as an additional merge lane on the Memorial Bridge. | 5c |

## IMMEDIATE ACTION STEPS

In addition, we propose the following for Business Route US-31:

### The State would:

- |   |  |    |
|---|--|----|
| ■ | Make all possible attempts to institute commuter rail mass transit between Muskegon and Holland with stops in Grand Haven and Ferrysburg.  | 6a |
| ■ | Install state-of-the art intersection improvements to maximize "through put", especially at Jackson immediately.   | 6b |
| ■ | Eliminate Michigan turns in favor of direct left turns with accompanying stacking/deceleration lanes wherever possible.  | 6c |
| ■ | Implement the best synchronization of traffic signals possible, including "adaptive/responsive signaling" at each intersection.  | 6d |
| ■ | Mitigate environmental impacts along the 120 <sup>th</sup> corridor not otherwise covered by federal criteria. (It is understood that an appropriate taxation mechanism that involves Grand Haven and all of Ottawa County would need to be instituted locally.) | 6e |
| ■ | Reduce the bascule bridge openings to once every two hours, in addition to not opening during rush hours as is true now. (U.S. Coast Guard review/approval would be needed.)   | 6f |

The City will:

- |  |    |
|--|----|
| <ul style="list-style-type: none"> <li>■ Experiment with staggered start and stop times for local industries and commercial businesses.</li> </ul> | 6g |
| <ul style="list-style-type: none"> <li>■ Identify and work to reduce, or eliminate, curb cuts onto Business Route US-31.</li> </ul>                | 6h |

**FURTHER ACTION STEPS IF ALL ELSE FAILS PRIOR TO IMPLEMENTING SIX LANES**

7

Once the trigger point occurs, the City will agree to the following in priority order, **prior to actually implementing six lanes:**

- Mutually accept the closing down of east/west through streets shown in P-1r, along with mutual agreement to build several unimpeded east/west streets over, or under, US-31.
- Other action steps which become apparent at that time as mutually desirable.

**TRIGGER POINT**

8

The Levels of Service (LOS) must drop to a Level of Service "F" at all three key intersections on a majority of the legs (Robbins, Washington and Jackson).

This trigger point requires City pre-agreement on the timing and length of the traffic counts (e.g. longer than three months in the summer).

The City must be alerted if levels of service go to Level of Service "D" and receive consulting on how to improve flow at such time. (The same consulting should occur if it drops to Level of Service "E".)

**DISCUSSION**

The P-1r changes would radically alter east-west flow within Grand Haven and would forever reduce the city's tax base to an unacceptable degree.

We believe the future for US-31 in the Twenty-first century is to let it transition gracefully into a "business route" and re-name it as such. US-31 never functioned well as a throughway through Ottawa County, and it never will, since it goes through the heart of the City. Two more lanes will only draw more traffic through an area ill-suited for the purpose of serving as a throughway.

**CONCLUSION**

We look forward to working with MDOT on your comprehensive traffic planning approach. We wish you success in these efforts.

For our part, we will be working with private employers in our community to reduce the traffic demands on Business Route US-31 immediately. Any assistance that you can provide in the way of mass transit planning and immediate synchronization and other intersection improvements, that will not reduce turning movements, will be readily accepted as previously noted.

Thank you for providing the opportunity to understand the plans and to respond.

Footnote: Attached is a list of errors from the Draft of the Environmental Impact Statement needing correction. This reaffirms some of the points in our previous letters of December 8, 1998.

f:\cmo\IP1\vision021500.mem

**City of Grand Haven, January 29, 2001**

1. Comment acknowledged. No response needed.
2. Comment acknowledged. See reply 4a for a response to this comment.
3. Comment acknowledged. The Preferred Alternative does not include replacement of the existing bridge over the Grand River in Grand Haven. There are no plans to build a bridge near 144<sup>th</sup> Street.
4. Principles
  - a. Comment acknowledged. As part of the Preferred Alternative, US-31 will be widened in the median from Columbus Street to Jackson Street, with intersection improvements at other locations. These improvements will require only a small amount of right-of-way at the intersections, rather than strips along the whole length of the roadway. This change will minimize any sense of separation or flow restriction.
  - b. Since the boulevard is being widened in the median, the impacts to surrounding homes and businesses are minimal. The median will be narrowed, not eliminated, with the proposed work.
  - c. The Preferred Alternative no longer includes a new bridge in Grand Haven.
  - d. Access to the downtown and the Beechtree industrial area will not be changed.
  - e. The Preferred Alternative ends just north of Jackson Street, and therefore does not impact the waterfront at all.
  - f. The Preferred Alternative does not cause any property losses to side street properties, and was modified to cause minimal impacts to just a few adjacent properties.
5. Pre-Conditions
  - a. M-231 (including the new Grand River bridge) will be the first part of the Preferred Alternative to be built. The segments on US-31 will follow.
  - b. Funding assistance for constructing the Beechtree/Jackson connector will need to be provided through local sources.
  - c. The US-31/Jackson Street intersection has been improved with two dedicated right-turn lanes for the westbound Jackson to northbound US-31 movement. There are no plans to add through lanes on US-31 north of Jackson Street.
6. Immediate Action Steps
  - a. Current projections for potential ridership on mass transit, either bus or rail, are not enough to support a commuter rail along US-31 at this time.
  - b. Traffic signals along US-31, including Jackson Street, have been studied and re-timed, or otherwise improved since the DEIS.
  - c. MDOT has and will continue to make geometric improvements at intersections along US-31 as opportunities arise.
  - d. See Reply 6b.
  - e. Environmental impacts along US-31 and the new M-231 will be mitigated according to federal and state criteria.

- f. The bascule bridge opens every hour when boat traffic is present, except for rush hours, as discussed in **Section 2.2**.
  - g. Comment acknowledged.
  - h. Comment acknowledged.
- 7. Further Action Steps – Comments acknowledged. Additional analysis and environmental clearance will be required for any work beyond the PA.
- 8. Trigger Point - Jackson Street is currently Level of Service “F” during the PM peak hour (not in the summer). The Preferred Alternative will improve the Level of Service to “E” for the design year of 2030. Washington Street is projected to have a Level of Service “C”, and Robbins Road a Level of Service “D”.



## City of Grand Haven

November 19, 2001

Vicky Weerstra  
MDOT  
1420 Front NW  
Grand Rapids, MI 49504

Dear Vicky:

Enclosed is an original approved resolution regarding the US-31 changes within the City of Grand Haven. (Please note each of the attachments which are specifically part of the resolution.) Thank you for your assistance.

Sincerely,

Ryan Cotton  
City Manager  
[rcotton@grandhaven.org](mailto:rcotton@grandhaven.org)

Attachments:

October 2001 Plans (Phase I & II)  
Correspondence from Dennis J. Kent, 10/25/01  
Correspondence from Roger C. Johr, 10/26/01

cc: Rod Wynn  
Mayor Lystra  
Members of the City Council  
W. Robert Huff, Public Safety Director  
Dan Czarnecki, Public Works Director

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519 Washington Avenue • Grand Haven, Michigan 49417-1486  
Phone: (616) 842-3210 • Fax: (616) 842-0085 • Web site: [www.grandhaven.org](http://www.grandhaven.org)

**RESOLUTION REGARDING US-31 CHANGES WITHIN  
THE CITY OF GRAND HAVEN**

WHEREAS, MDOT is developing a Final Environmental Impact Statement (FEIS) for the Federal Highway Administration which includes a new bridge over the Grand River, improvements to existing US-31 in Grand Haven and Holland, and a freeway corridor near 120<sup>th</sup> Avenue called F/J1, and;

WHEREAS, the existing US-31 is evolving into a business route necessitating improvements to intersections, adding additional lanes and replacement of the existing bridge, fixed or bascule based on the approval of the United States Coast Guard at the time of construction, and;

WHEREAS, the City of Grand Haven studied the revised F/J1 plans proposed in October, 2001 and requested public input from September 15, 2001 to November 5, 2001 through placing the plans on display at the Community Center and receiving public comment at the Work Session of October 1, 2001 and the City Council Meeting of November 5, 2001, and;

WHEREAS, the City of Grand Haven understands that approval of these changes on US-31 will make the F/J1 Bypass possible elsewhere in the County;

NOW, THEREFORE, BE IT RESOLVED, that the City of Grand Haven generally supports both Phases of the project with our understanding that MDOT does not plan to construct the Phase II portion of the expansion until such time as traffic improvements on the 120<sup>th</sup> corridor are operational, including a new bridge and a connecting Bypass known as F/J1 to at least M-45, and not until traffic need is demonstrated within the City;

BE IT FURTHER RESOLVED, that the City of Grand Haven otherwise supports the Phase I and Phase II plans entitled F/J1 Preferred Alternate as modified by the October, 2001 versions, as shown on the attachments, for the existing US-31 route in Grand Haven with the following requests:

- 1) The Plans be built in Phases as indicated in the attached correspondence from Dennis J. Kent, MDOT Grand Region Transportation Planner, dated October 25, 2001;
- 2) Direct northbound access to US-31 from 7th Street be preserved, or as an alternative, construct intersection alternative #2 in the letter from Roger C. Johr, P.E. of Williams & Works dated 10/26/01. See the options provided in the attached letter from Williams and Works;
- 3) Continue to forgo the secondary bridge to Harbor Island that was once located on the plans to the west of the new proposed bridge in favor of the Third Street bridge route;
- 4) Investigate opportunities to co-locate the necessary drainage pond with other pre-existing wetlands so as to eliminate the loss of developable space on the west side of the new bridge approach;

5) Build a new bascule bridge in such a way that there is sufficient passage underneath it for the eventual Boardwalk so bicycles and pedestrian traffic can cross underneath and proceed upstream to the east;

6) Review other possible sources of transportation funding for the City's eventual widening improvements to Jackson Street which are necessary, given the City's request to remove the secondary bridge to Harbor Island. Although not part of the US-31 project, the City hereby requests that the project to be coordinated with the MDOT US-31 project for construction;


7) Purchase the property for MDOT right-of-way that is necessary with the understanding that the City's Zoning requires "full property taking" unless, at the discretion of the property owners, a lesser amount is agreed upon;

8) Make all efforts to phase-in, and make use of the new southbound lanes, of the new bridge during construction so as to reduce the need for a completely separate footprint for the new bridge and so as to reduce the impact on waterfront properties to the west;

9) Make available, through the State excess property process, any land that would no longer needed for US-31 in the Grand River area, to the City for \$1.00 if re-used for transportation purposes, and for fair market value if not, in accordance with State law.

BE IT FURTHER RESOLVED, that although the plans are marked as "proposed" and "subject to change," the City of Grand Haven does not automatically agree with any changes made hereafter and would like to review and comment on any such modifications to the plans for the project from this point forward and financing as it relates to the project within the City, and;

BE IT LASTLY RESOLVED, that the City of Grand Haven deeply appreciates the numerous efforts by the Michigan Department of Transportation staff to fully consider all options and to seek common ground.

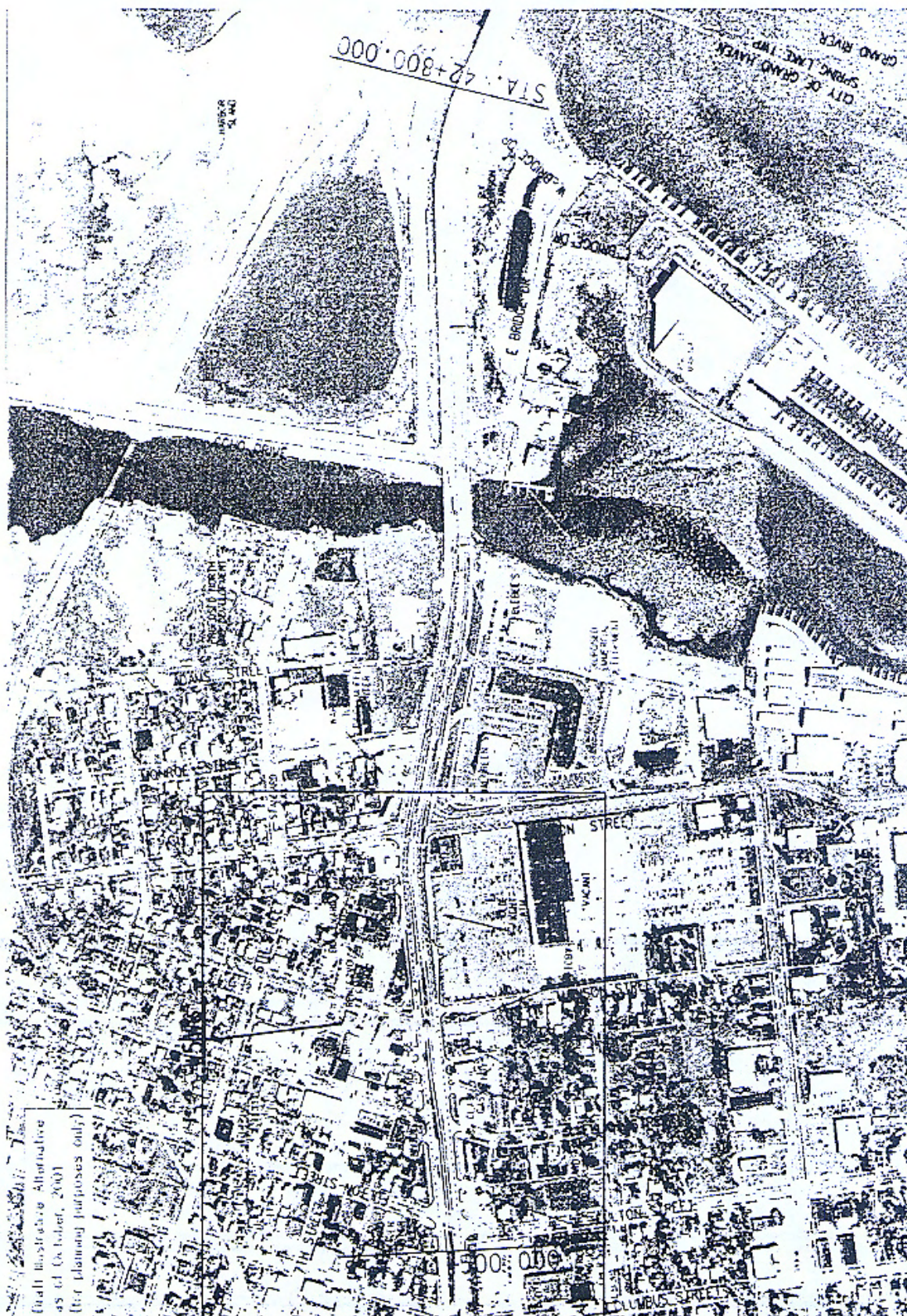
  
\_\_\_\_\_  
Edward H. Lystra, Mayor

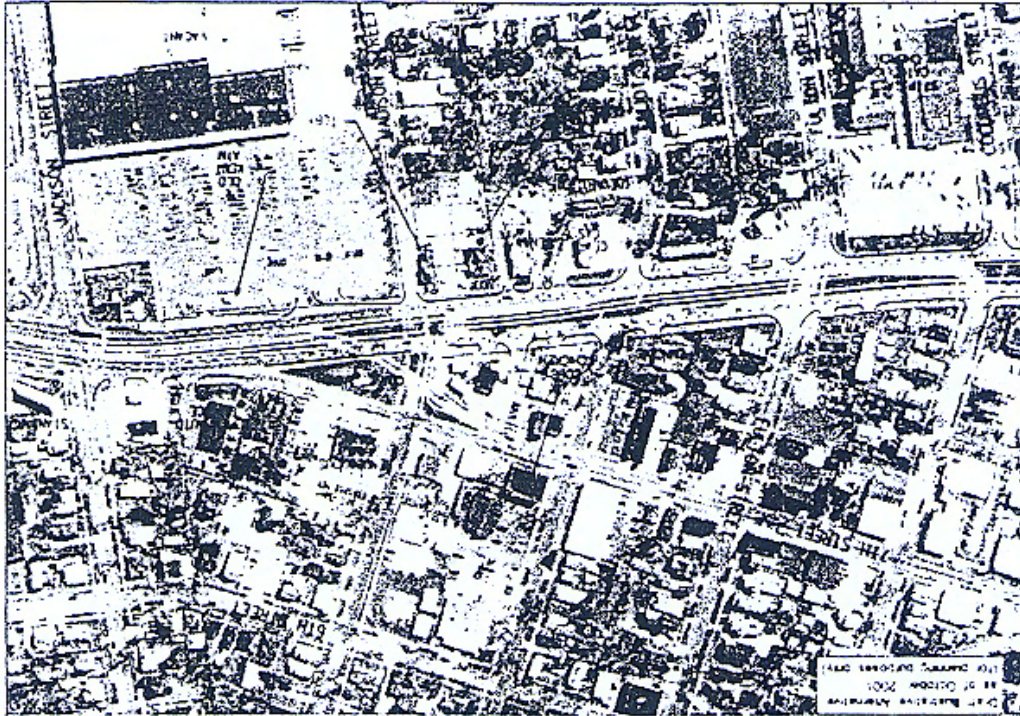
Approved 11-5-01

  
\_\_\_\_\_  
Sandra Huff, City Clerk

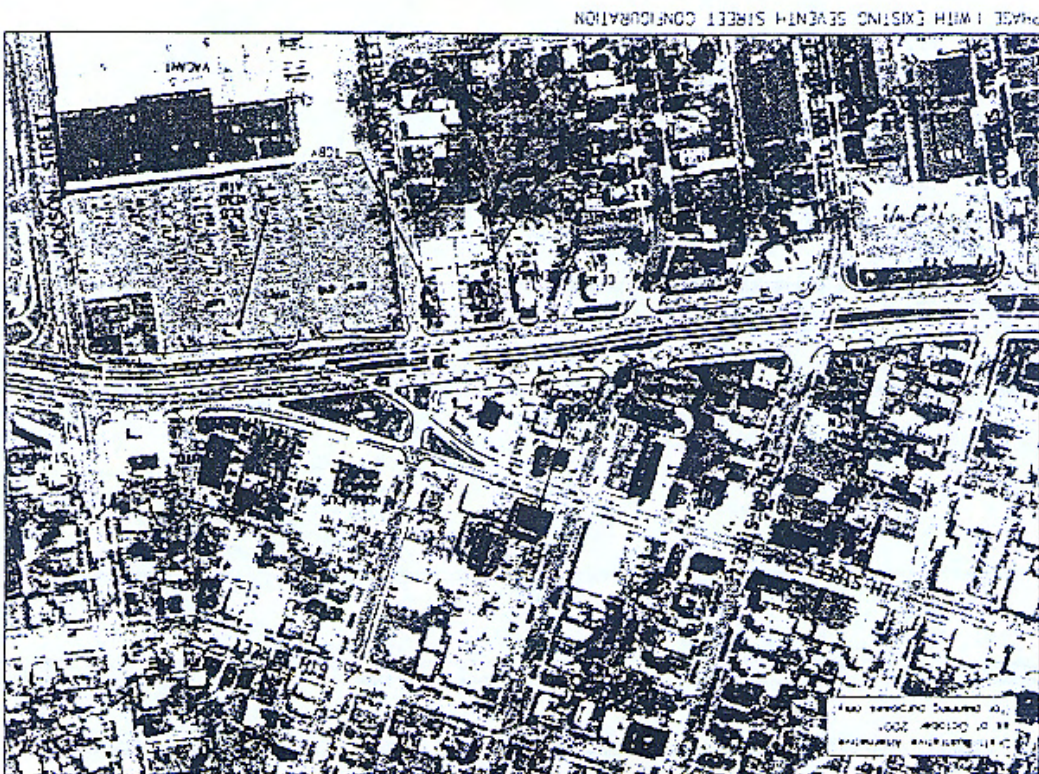






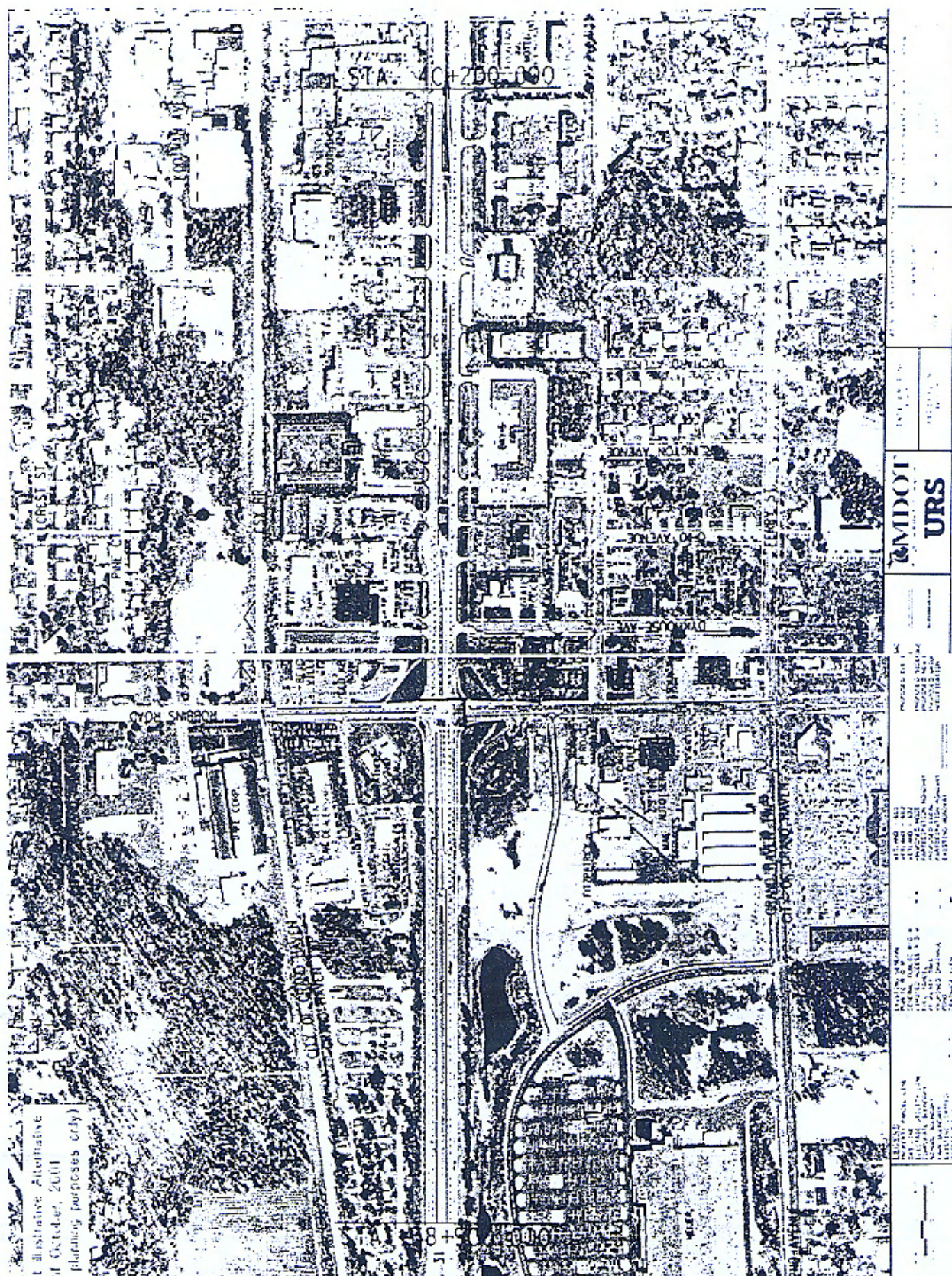


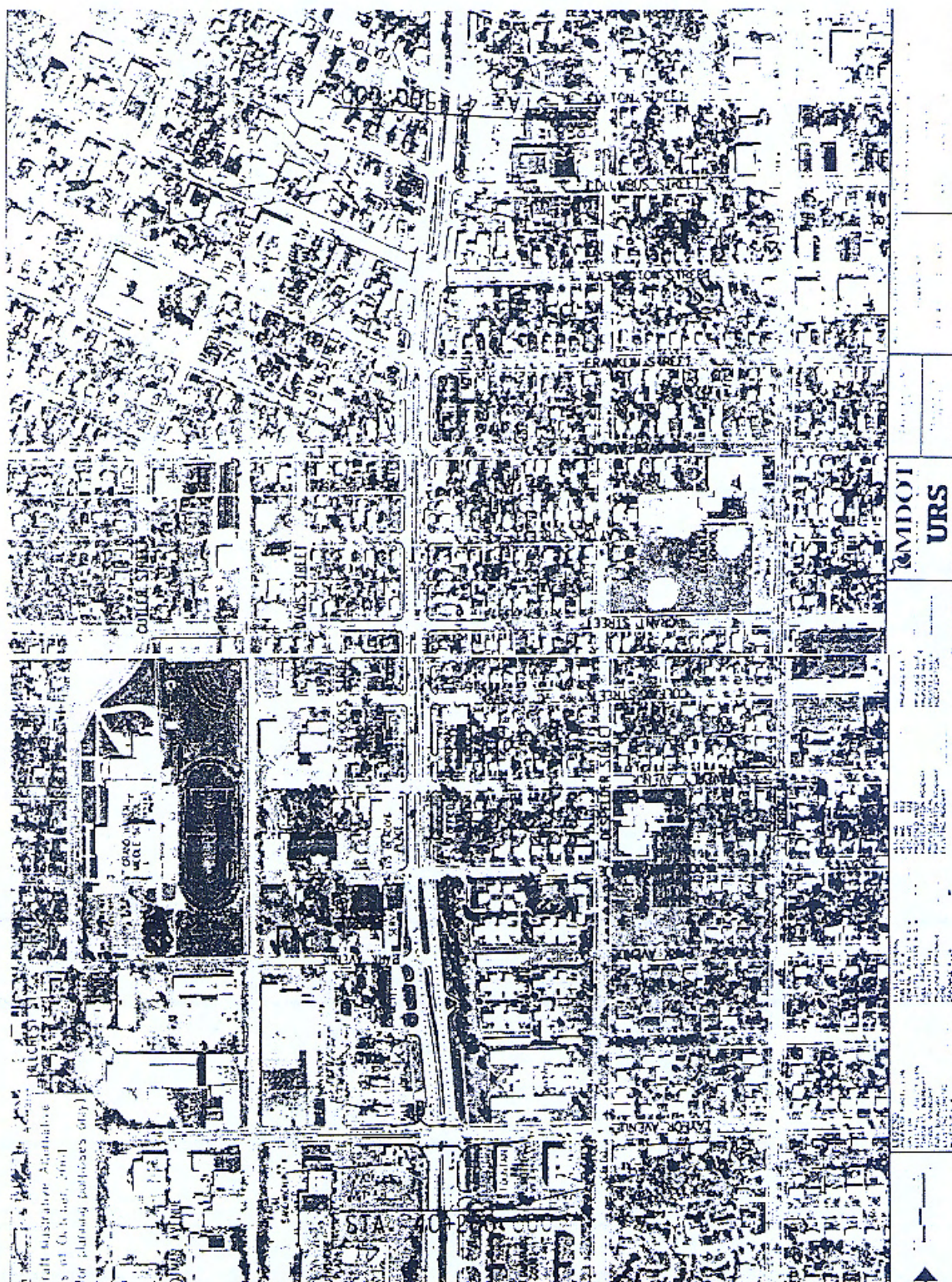
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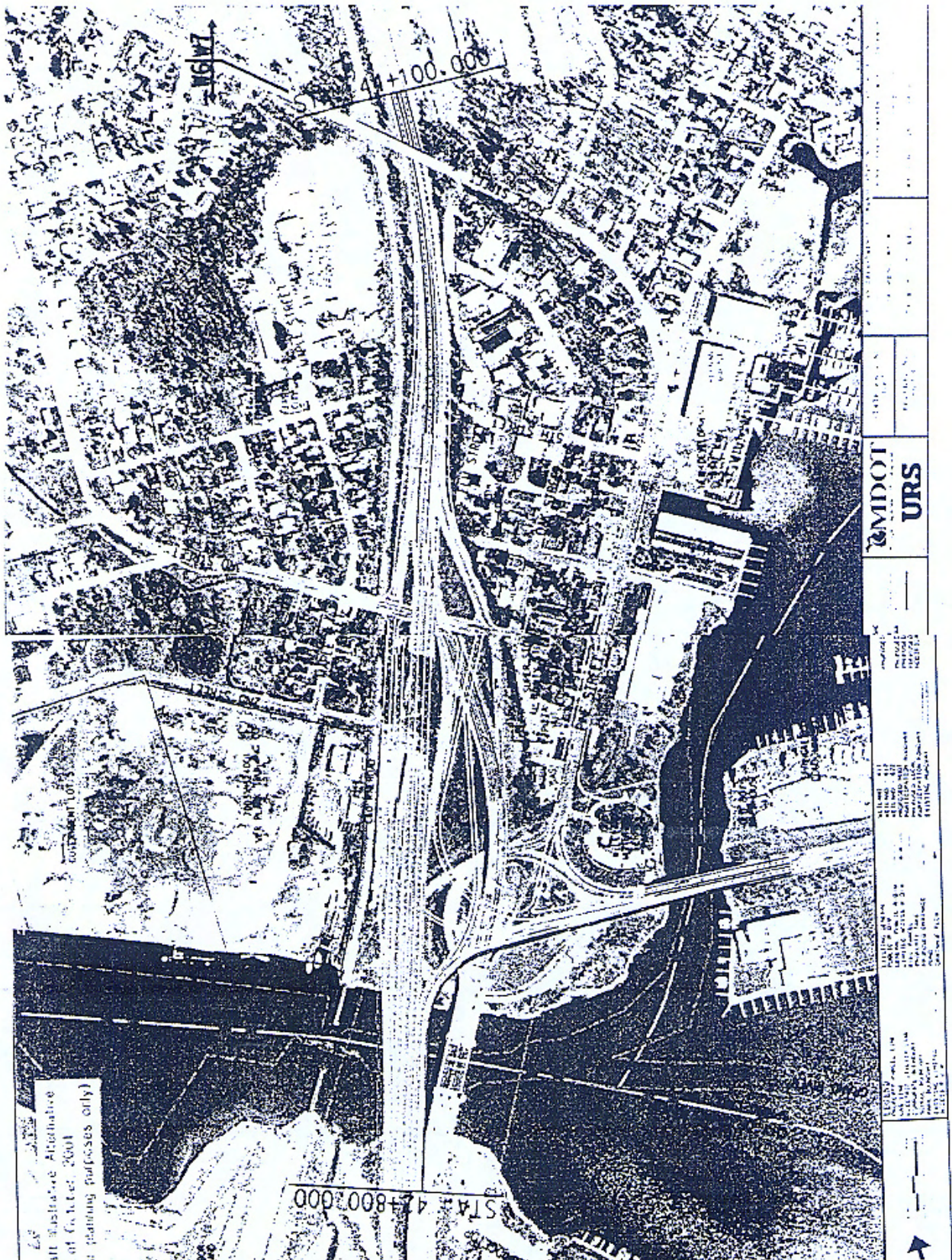
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	PROJECT NAME	
URS	PROJECT NO.	
	PROJECT NAME	











TRANSPORTATION  
COMMISSION  
BARTON W. LaBELLE - Chairman  
JACK L. GINGRASS - Vice Chairman  
BETTY JEAN AWREY  
TED B. WAHBY  
LOWELL B. JACKSON  
JOHN W. GARSIDE  
LH-GRA-0 (01/01)

STATE OF MICHIGAN



JOHN ENGLER, GOVERNOR

DEPARTMENT OF TRANSPORTATION

GRAND REGION OFFICE  
1420 FRONT AVENUE NW, GRAND RAPIDS, MICHIGAN 49504  
PHONE: 616-451-3091 FAX: 616-451-0707  
GREGORY J. ROSINE, DIRECTOR

October 25, 2001

Mr. Ryan Cotton, City Manager  
City of Grand Haven  
519 Washington Ave.  
Grand Haven, Michigan 49417-1486

Dear Mr. Cotton:

Enclosed are Michigan Department of Transportation (MDOT) responses to City Council questions regarding US-31(Beacon Boulevard) from the City of Grand Haven work session, the evening of October 1, 2001. Maps indicating the phased improvements within the City were provided to you last week, as requested. The responses have been revised and updated based on subsequent conversations with you and URS Corporation staff.

Some questions regarding specific design issues are beyond the scope of the Environmental Impact Statement (EIS) process, and can be addressed by the City and MDOT during the final design phase of the US-31 project. The Final EIS is expected to be completed and submitted to the Federal Highway Administration (FHWA) by the end of this year. The US-31 Preferred Alternative in the Final EIS will include both a proposed new freeway route, generally along the 120<sup>th</sup> Avenue corridor east of Grand Haven, as well as improvements to the existing US-31 route. Final design cannot begin until the EIS is approved by FHWA. Construction schedules for all phases of the US-31 project will depend on statewide funding availability.

Please feel free to call either me, or Vicki Weerstra, Associate Region Engineer-Development, at (616) 451-3091, if you have any questions. Thank you for your support for the US-31 project.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. Kent", written over a horizontal line.

Dennis J. Kent  
Grand Region Transportation Planner

cc: V. Weerstra  
M. Alghurabi  
T. Petko, URS Corp.  
Rod Wyns

Encl.



## US-31 ISSUES in the CITY of GRAND HAVEN

The following are Michigan Department of Transportation (MDOT) responses to City Council questions regarding US-31(Beacon Boulevard) from the City of Grand Haven work session, the evening of October 1, 2001, and subsequent discussions with the City Manager:

### Ottawa County Road Commission Property Issue

For the North parcel - OCRC 1 (north of Adams St):

Alt. w/ new bridge adjacent to the existing US-31: will need 2.41 of 3.00 acres, or 80 % of the parcel, (As presently drawn in Appendix A)

Alt. w/ 3rd St. bridge, w/o bridge adjacent to US-31: will need 1.30 of 3.00 acres, or 43% of the parcel, (As will be modified in Appendix A)

For the South parcel - OCRC 2 (south of Adams St.):

Alt. w/ new bridge adjacent to the existing US-31: will need 0.63 of 3.54 acres, or 18% of the parcel, (As presently drawn in Appendix A)

Alt w/ 3rd St. bridge, w/o bridge adjacent to US-31: will need 0.60 of 3.54 acres, or 17% of the parcel, (As will be modified in Appendix A)

These alternatives assume a right-of-way (ROW) line 5 meters off the edge of the travel lane. (See attached maps.)

### DETENTION POND

Some additional land will be needed for detention ponds related to the new bridge construction, and modified Beacon Blvd. However, MDOT detention needs could be coordinated with City detention needs related to the future north-end redevelopment project. The proposed MDOT detention pond discharge could be directed to any location within the north-end development area, adjacent areas, and/or in combination with MDOT excess property. Potential detention pond locations will be dependent upon a site having the appropriate slope, storm-water volumes, and soil conditions. Detention ponds can become an amenity to the any future development projects within the City, if planned for from the beginning. The drawing in the Draft EIS/Appendix A shows one potential location for the detention pond, within the referenced parcels. MDOT has no authority to acquire property outside of direct project impacts for detention, mitigation, etc. However, we are willing to discuss alternate locations for the pond with willing property owners, including the City. Any sites located off MDOT owned ROW will require participation agreements, per applicable state laws and regulations

MDOT needs to account for approximately 2.5 acre-ft. of detention in this area, which includes run-off from the US-31 bridge and a portion of Beacon Blvd., before the water is released into the Grand River or the South Channel. Run-off discharged directly into a body of water or wetland is not acceptable to the Resource Agencies or the public, as was noted in numerous public and agency comments throughout the Draft EIS process. Based on this volume of water, some possible detention pond surface area requirements are as follows: @ 1ft in depth, 2.44 acres of surface area; @ 2 ft in depth, 1.22 acres of surface area.; @ 4ft in depth, 0.61 acres of surface area. Exact dimensions, locations, and access issues will be modified during the final design phase of the US-31 project, and once City plans are known for the area.

p.2/US-31/GH

### 7th Street Relocation - EB to NB Turning Movement Change

The current (2000) Peak Hour Volume (PHV) for the existing 7<sup>th</sup> St. NB left-turn movement is: AM - 100 vehicles and PM - 225 vehicles. Traffic model estimates indicate that, with closing one block of 7<sup>th</sup> Street to NB traffic, approximately 50% of the EB to NB traffic (~110 vehicles in the PM peak hour) will go to the improved Columbus St. intersection to turn left onto NB US-31; 20% (~45 vehicles in the PM peak hour) will go to the Jackson St. signal to turn left; and 30% (~70 vehicles in the PM peak hour) will use the relocated 7<sup>th</sup> St. NB access at Madison St. or Elliot St. to make the indirect left to NB US-31. Columbus Street has more excess capacity to accept this movement and also provides more direct access for downtown traffic than Jackson Street does; therefore, it is able to accommodate more of the relocated EB to NB 7<sup>th</sup> St. movements. (SB 7<sup>th</sup> Street access from US-31 will not change. In addition, new access to 7<sup>th</sup> St., from NB US-31 via Madison St. extended, is also provided with the relocation of 7<sup>th</sup> St.)

Based on re-assigning the 7<sup>th</sup> Street EB to NB left-turn volumes, the estimated volumes on the Columbus, Jackson, and Madison/Elliot routes would be as follows:

#### EB to NB US-31- Left-turn PHV's in 2000 - 7<sup>th</sup> St. Vicinity in Grand Haven

	<u>7th Street</u>	<u>Columbus</u>	<u>Jackson</u>	<u>Madison/Elliot</u>
<b>Existing</b>				
AM	100	50	150	n/a
PM	225	125	275	n/a
<b>Change from 7th Street EB&gt;NB closure</b>				
AM	-100	+50	+20	+30
PM	-225	+110	+45	+70
<b>Total w/ Existing 7th Street EB&gt;NB Closure</b>				
AM	0	100	170	30
PM	0	235	320	70

### PHASING/SCHEDULES

The exact timing of the proposed improvements to the existing US-31 corridor (Beacon Blvd.) in Grand Haven are dependent on, federal approval of the Final EIS, statewide funding availability and US-31 traffic operational needs in the City. Based on previous discussions with the City, our intent is to begin constructing the segment of the new US-31 freeway route, between I-96 and M-45, first. This segment will provide the desired new Grand River crossing, which is a priority for the area, and it will have the most direct affect on Beacon Blvd. traffic in Grand Haven. Concurrently, our plan is to construct Phase 1 of the Beacon Blvd. modifications in Grand Haven, to address the most immediate traffic issues along US-31 within the City. Initially, the existing NB 7<sup>th</sup> St. movement to US-31 could remain open; however, the relocation of the 7<sup>th</sup> St. NB movement to Madison St. extended, would be implemented in the future based on traffic operational needs in that area. Phase 2 would begin after the segment of the new freeway route including the second Grand River crossing is operational, or when traffic conditions within the city indicated a need for additional improvements along Beacon Blvd. The exact timing of Phase two's implementation should remain flexible enough to address future City and MDOT traffic issues as they develop, and to accommodate the safety of the motoring public. Replacement of the existing US-31 bascule bridge and connecting roadway improvements will be implemented when needed, based on the bridge condition, as the last stage of Phase 2; replacement is not expected before 15 to 25 years.

p.3/US-31/GH

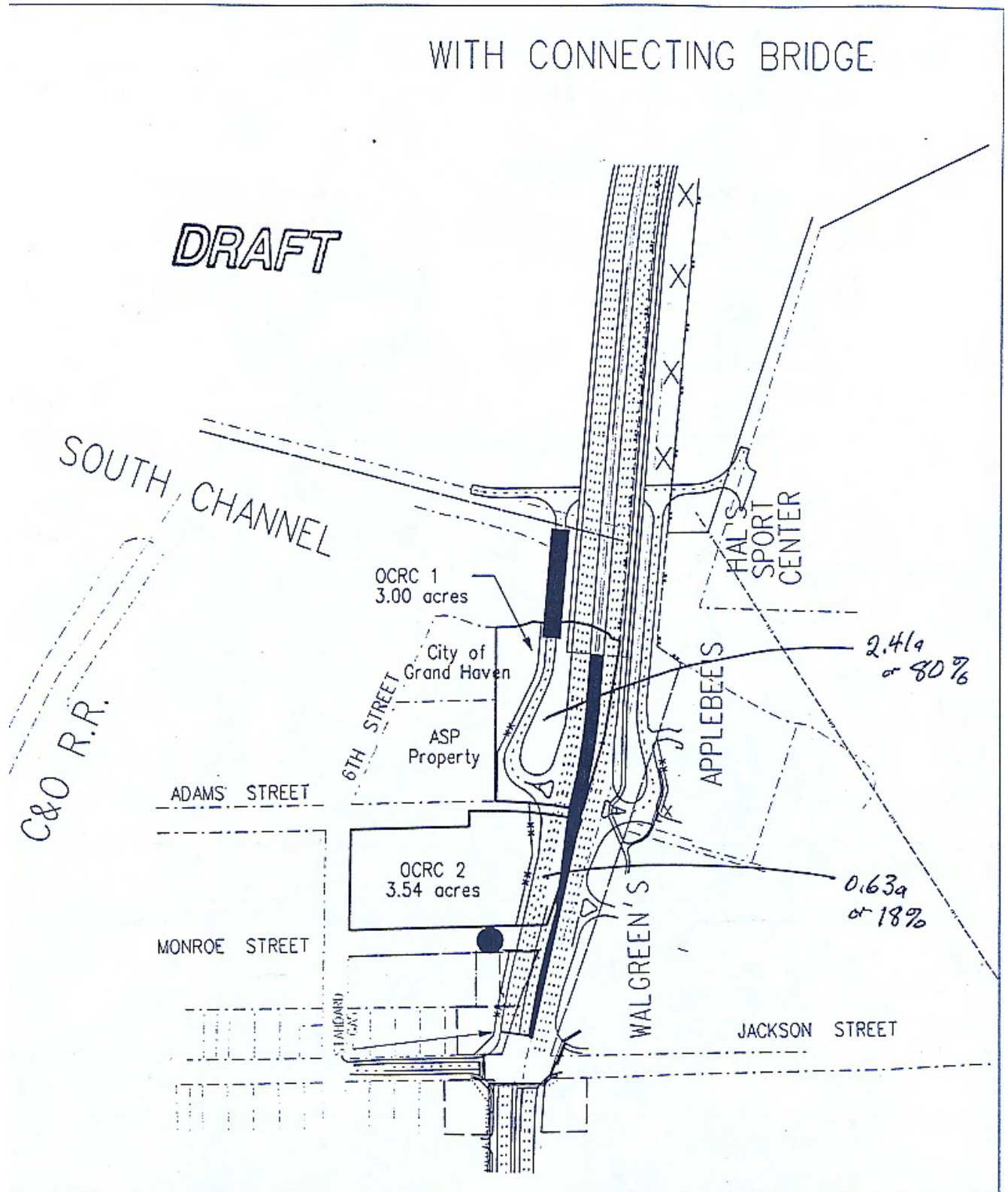
#### SUMMARY

Under an interim scenario in Phase 1, the **NB 7<sup>th</sup> St. movement to US-31 could remain open**; however, the relocation of the 7<sup>th</sup> St. NB movement would be implemented in the future based on traffic operational needs in that area. The NB 7<sup>th</sup> St. relocation scenario would close **one block of 7<sup>th</sup> St., to NB traffic only**, north of Madison St.; concurrently, **Madison St.** would be extended to US-31 from 7<sup>th</sup> St. Relocated NB 7<sup>th</sup> St. traffic could then use indirect left-turns to access NB US-31 from either **Madison or Elliot Sts.** With the 7<sup>th</sup> St. relocation, **new access is also provided to the 7<sup>th</sup> St. area, with a direct left-turn from NB US-31 via Madison St. extended.** The 7<sup>th</sup> St. SB route will remain open from US-31, and 7<sup>th</sup> St. south of Madison St., will remain open, under all scenarios. The EB to NB left-turning movements could be made either directly from Columbus St. to US-31, or indirectly from Madison or Elliot Streets, to US-31, under the relocated 7<sup>th</sup> St. scenario. The **SB traffic route from US-31 to 7<sup>th</sup> St.** would remain unchanged from the current routing in all phases.

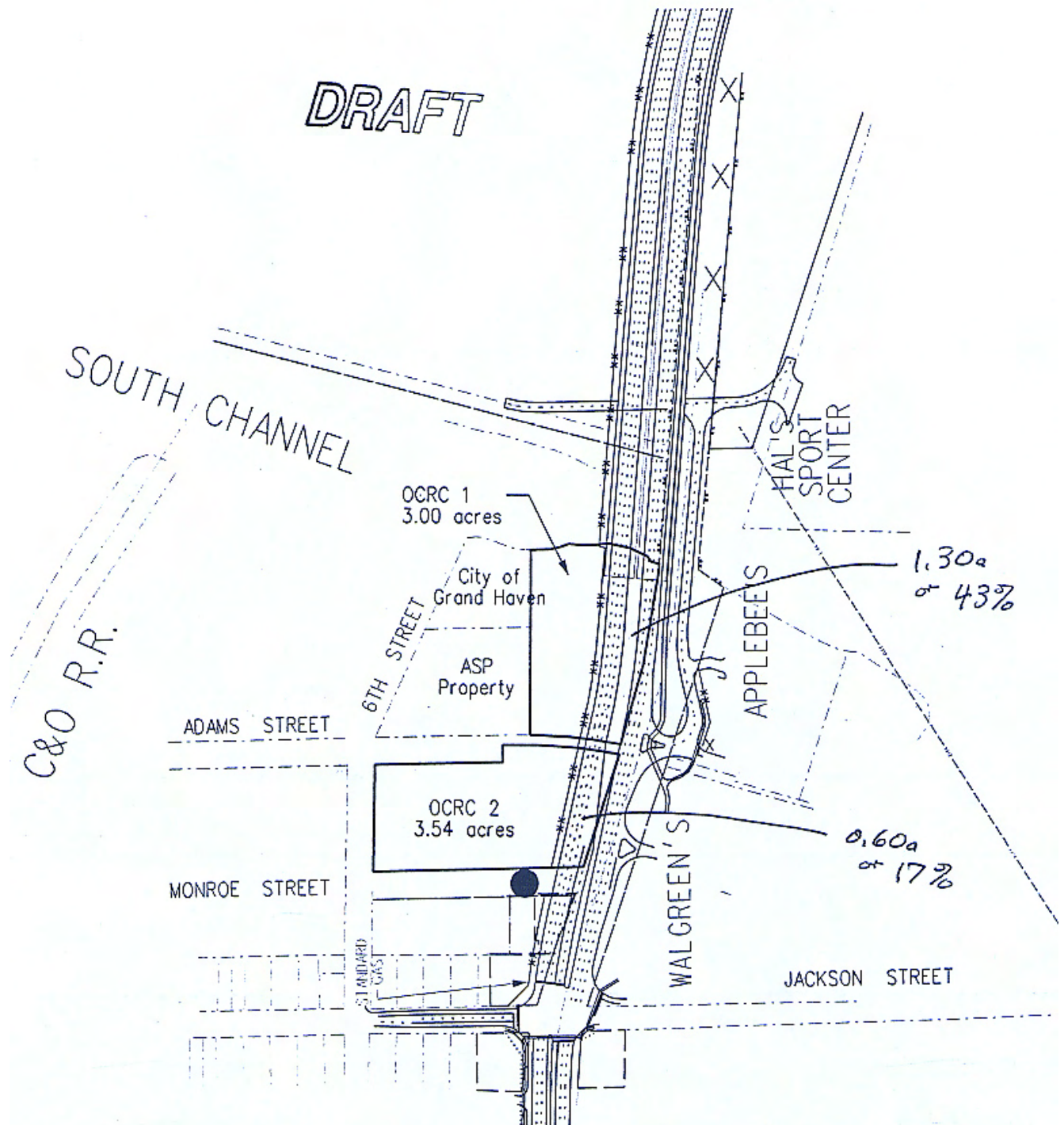
With the relocation of the NB 7th Street movement, much of the EB to NB left-turn movements are expected to be rerouted to the **improved Columbus St.** intersection at US-31, which will have a new dedicated NB lane added in Phase 1 for this turning traffic. Columbus St. should be able to accept most of the left turning vehicles from NB 7<sup>th</sup> St., since it has excess existing and future capacity in the AM and PM peak-hours. Traffic tends to avoid intersections with more delays in favor of less congested routes, like Columbus, Madison, and Elliot Streets. Based on this analysis, none of the US-31 intersections at Columbus, Jackson, Madison or Elliot seem to create a problem that would prevent the proposed relocation of the NB 7<sup>th</sup> St. movement to Madison St. extended. Grand Haven could also sign and promote **Columbus St.** as an exit from downtown and encourage people to use this route, versus Jackson Street, to access NB US-31. Dual EB left-turn lanes and a traffic signal have been recommended at the **Columbus St./Beacon Blvd. intersection**, to accommodate the anticipated EB to NB left-turning movements from relocated 7<sup>th</sup> St. Before adding a new signal at Columbus St., or any other locations along US-31, the affects of the additional signal must be considered within the context of overall signal spacing and US-31 corridor traffic operations in the City, at the time of construction. Specific issues like this are usually addressed during the final design phase of a project.

Specific design issues are beyond the scope of the EIS process, and can be addressed by the City and MDOT during the final design phase of the US-31 project. The Final EIS is expected to be completed and submitted to the Federal Highway Administration (FHWA) by the end of this year. Final design cannot begin until the EIS is approved by FHWA.

(Attachment)



WITH THIRD STREET BRIDGE



## Williams & Works

• a tradition of service •

- Engineers
- Planners
- Surveyors

October 26, 2001

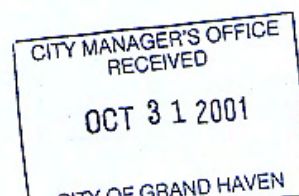
Mr. Ryan Cotton, City Manager  
City of Grand Haven  
519 Washington Ave.  
Grand Haven, MI 49417-1486

Re: 7<sup>th</sup> Street/US-31 Intersection

Dear Ryan:

As requested, I have reviewed some various alternatives to the 7<sup>th</sup> Street/Madison Street/US-31 (Beacon Blvd) intersection being proposed by the Michigan Department of Transportation (MDOT) as a part of the US-31 by-pass EIS. My review is based on our meeting on Thursday, October 18, 2001, in your office with members of the City Council and City Staff to discuss Grand Haven's concerns related to the proposed intersection configuration and my subsequent conversations with Dennis Kent of MDOT regarding the intersection and traffic information furnished by Dennis contained in a document labeled "US-31 Issues in Grand Haven - Draft" dated October 22, 2001.

Grand Haven's concerns regarding the proposed 7<sup>th</sup> Street/Madison Street/US-31 (Beacon Blvd) intersection relate primarily to the reconfiguration of the east bound (EB) 7<sup>th</sup> Street to north bound (NB) US-31 movement. Currently, EB 7<sup>th</sup> Street traffic can cross SB US-31 and merge into the left through or left turn lane on NB US-31, thereby giving EB 7<sup>th</sup> Street traffic direct access to NB US-31. The proposed intersection configuration requires EB 7<sup>th</sup> Street traffic to make an indirect left turn from Madison Street to NB US-31. This involves a right turn from Madison Street onto SB US-31 traveling two blocks south to Fulton Street and making a left turn through the median and onto NB US-31. The City is extremely concerned that the described reconfiguration will significantly change the amount of EB traffic on 7<sup>th</sup> Street thereby having an adverse impact on the commercial/retail business along 7<sup>th</sup> Street and, in addition, makes access to NB US-31 more inconvenient for residents in the immediate area. The City's concern regarding EB traffic on 7<sup>th</sup> Street and its potential impact on commercial/retail business along 7<sup>th</sup> Street is supported by MDOT's traffic model which suggests that 70% of the current traffic on EB 7<sup>th</sup> Street will find alternate routes at peak times of the day.



Mr. Ryan Cotton  
October 26, 2001  
Page 2

It should be noted that subsequent to our meeting on October 18, 2001, MDOT has proposed that the 7<sup>th</sup> Street/Madison Street/US-31 intersection could remain "as is" in its current configuration through Phase I of the by-pass project. The operation of the intersection in its current configuration would be monitored to determine if modifications or construction of the proposed intersection reconfiguration is required. I believe this is a prudent approach to the problem. It may be determined that the intersection in its current configuration functions just fine with the addition of the through lanes on US-31 (Beacon Blvd.) and with the by-pass open to traffic, in which case no major intersection reconstruction would be necessary.

Should it be determined during this evaluation/monitoring period that modifications to the intersection are necessary, the possible alternative intersection configurations we have discussed could be evaluated along with MDOT's proposed improvements.

The following is a description and discussion of each intersection alternative including MDOT's proposed reconfiguration:

1. MDOT proposed 7<sup>th</sup> Street Intersection with indirect left turn to NB US-31 (refer to MDOT illustrations attached).
  - Pros:
    - a. Provides access from NB US-31 to Madison Street/7<sup>th</sup> Street, this currently cannot be done.
    - b. No signals required.
  - Cons:
    - a. Restricts direct access from EB 7<sup>th</sup> Street to NB US-31 and will re-direct approximately 70% of the EB 7<sup>th</sup> Street traffic to other access points.
2. Construct an intersection at Madison Street and US-31 similar to Columbus Street and close the existing access from EB 7<sup>th</sup> Street to NB US-31.
  - Pros:
    - a. Maintains the status quo. This alternate will function similarly to the current intersection.
    - b. Improves safety by "squaring up" the intersection with US-31.
    - c. Improves functionality of the left turn maneuver from 7<sup>th</sup> Street/Madison Street to NB US-31 by moving this access point further south from the Jackson Street. intersection.
    - d. No signals required.

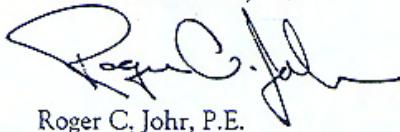
Mr. Ryan Cotton  
October 26, 2001  
Page 3

- Cons: a. Maintains status quo. No access from NB US-31 to 7<sup>th</sup> Street/Madison Street is possible, which is also the current situation.
3. Construct a full four-leg signalized intersection with Madison Street and US-31 or Elliott Street and US-31 and close the existing access from EB 7<sup>th</sup> Street to NB US-31.
- Pros: a. Provides access in all directions.  
b. Promotes access from neighborhoods on the east side of the City to the west side and visa versa.
  - Cons: a. May be too close to the Jackson Street intersection to function properly, thereby re-directing traffic that would like to use this route to other non-desirable routes.  
b. This alternate also has the potential of disrupting the flow of traffic on US-31.  
c. Signals are required.  
(MDOT would need to review and model this configuration to determine its feasibility)

The alternatives presented should be reviewed and evaluated after the by-pass and Phase I are completed and new operational data is collected on the 7<sup>th</sup> Street/US-31 intersection. This will also provide an opportunity to review any new trends related to land/property development and traffic generators, which could be critical to determining the best intersection configuration for this location. The best intersection configuration may not be one of these alternatives when all of these factors are evaluated in 8-10 years. But, given the current information, the City's preference would be Alternate 2 or 3 as defined above.

If you should have any questions or require additional information, please don't hesitate to contact me.

Sincerely,  
Williams & Works, Inc.



Roger C. Johr, P.E.

**City of Grand Haven, November 19, 2001**

A number of refinements were made in Grand Haven to address the City of Grand Haven's concerns. These are documented in a letter prepared by MDOT to the City of Grand Haven City Manager dated October 25, 2001. This letter is located within this chapter. The refinements are summarized below:

- The additional through-lane was relocated from the outside of the roadway section to the median side of US-31 to keep the improvements within the existing right-of-way.
- Side streets previously proposed to be cul-de-sacs were left open to maintain local access.
- MDOT continues to coordinate with the City of Grand Haven on this issue to minimize impacts, while maintaining access to Harbor Island. A Resolution to Accept Statement of Understanding GrandWater Jurisdiction Transfer dated March 15, 2004 describes the agreements reached, and is included on the following page.



## City of Grand Haven

April 22, 2004

Ms. Vicki Weerstra  
Michigan Department of Transportation  
1420 Front Street NW  
Grand Rapids MI 49504

Re: Jurisdiction Resolution

Dear Vicki:

Hank VanderWerp recently informed me that you had requested documentation of the above mentioned. Enclosed is a copy of a resolution passed on Monday, March 15, 2004 by the Grand Haven City Council.

Please let me know if there is anything else needed to assist in this matter.

Sincerely,

Patrick McGinnis  
City Manager

enc.

519 Washington Avenue · Grand Haven, Michigan 49417-1486  
Phone: (616) 842-3210 · Fax: (616) 842-0085 · Web site: [www.grandhaven.org](http://www.grandhaven.org)

CITY OF GRAND HAVEN, MICHIGAN  
RESOLUTION TO ACCEPT  
STATEMENT OF UNDERSTANDING  
GRANDWATER JURISDICTION TRANSFER

Resolution accepting the following statement of understanding between the City of Grand Haven and the Michigan Department of Transportation regarding the City's acceptance of future improvements to be constructed by the State.

**MDOT/Grand Haven GrandWater Jurisdiction Transfer**

As a component of future improvements planned for US-31 (Beacon Boulevard) and the South Channel/Grand River crossings north of Jackson Street in the City of Grand Haven, the Michigan Department of Transportation (MDOT) shall construct and modify local streets within the GrandWater Development area including the unnamed street and future bridge between the limits of Adams Street and Coho Drive. These modifications are for the purpose of providing local access within the GrandWater Development area, and between the GrandWater Development, US-31, Jackson Street, Coho Drive and other adjacent local streets and properties in the area.

The new and/or modified local streets will improve access to and within the GrandWater Development area. Once constructed by MDOT, these new and/or modified facilities will function as city major or local streets, with no remaining state trunkline function. As such, MDOT desires to retain no ongoing interest in or jurisdiction over these facilities. To facilitate local city use and provide for the necessary city control of these new and/or modified facilities, jurisdiction will be transferred from MDOT to the City of Grand Haven, upon completion of the improvements by MDOT. City jurisdiction and control will include all aspects of routine maintenance, traffic control, future rehabilitation or improvements, and other operational issues, per Michigan Act 51.

An agreement will be developed between MDOT and the City to facilitate this transaction, once US-31 improvements are scheduled or programmed.

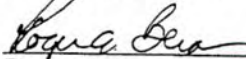
YEAS: FRITZ, MCCALED, NIEUWENHUIS, TAMMEN

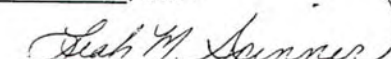
NAYS: NONE

ABSENT: BERGMAN

APPROVED: MARCH 15, 2004

I, Leah M. Spinner, City Clerk of Grand Haven, Ottawa County, do certify that the above is a true and complete copy of a resolution adopted by the City of Grand Haven City Council at a regular meeting held on MARCH 15, 2004

  
Roger A. Bergman, Mayor

  
Leah M. Spinner, City Clerk

**City of Grand Haven, April 22, 2004**

Comment acknowledged, no response required.



4814 Henry Street  
Norton Shores, Michigan  
Phone (616) 798-4391  
Fax (616) 798-7103

January 20, 1999

Mr. Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Lopez:

The City Council of the City of Norton Shores at its meeting of January 19, 1999 adopted a resolution endorsing the Muskegon County US-31 Blue Ribbon Committee's position on the recently completed Draft Environmental Impact Statement for US-31 in Allegan, Ottawa, and Muskegon counties. Please enter the enclosed resolution into the record of public comments.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lynne A. Mahan", written in a cursive style.

Lynne A. Mahan  
City Clerk

LAM/jab

Enclosure

RESOLUTION

WHEREAS, the Michigan Department of Transportation has recently completed a Draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa, and Muskegon Counties to determine the preferred alternative(s) for addressing traffic congestion on US-31, and

WHEREAS, US-31 is a vital transportation corridor for Muskegon County; serves a significant number of commercial and industrial enterprises in the county, and will continue to be an important north-south corridor in the economic development of the West Michigan Region, and

WHEREAS, community leaders in Muskegon County representing business, industry, tourism, government, financial institutions, and other interests have organized under the umbrella of a Muskegon County US-31 Blue Ribbon Committee to review the Environmental Impact Study and formulate a Muskegon County position regarding the alternatives under consideration, and

WHEREAS, the position of the Muskegon County US-31 Blue Ribbon Committee is summarized in a position paper, which was unanimously adopted by the committee on November 16, 1998;

NOW, THEREFORE, BE IT RESOLVED that the City of Norton Shores hereby endorses the position of the Muskegon County US-31 Blue Ribbon Committee, and requests the Michigan Department of Transportation enter this resolution into the record of public comments.

At a regular meeting of the City Council of the City of Norton Shores, held at the Norton Shores Branch Library, 705 Seminole Road, on the 19th day of January, 1999, the foregoing resolution was moved for adoption by Council Member Beecham. The motion was supported by Council Member Kinney.

Ayes: Mayor Crandall, Council Members Broge, Beecham, Dolack, Kinney, McCartney, Scolnik and Waldo

Nays: None

Excused: Council Member Wiersma

Resolution declared adopted.

  
Lynne A. Mahan, City Clerk

**City of Norton Shores, January 20, 1999, Resolution**

Acknowledge receipt of the City of Norton Shores resolution supporting Alternative A. This alternative was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**.

## City of Zeeland

21 South Elm Street  
Zeeland, Michigan 49684

(616) 772-0870  
FAX (616) 772-0880

January 18, 1999

Mr. Robert Den Herder, Chairman  
MACC Policy Committee  
400 136th Avenue, Suite 416  
Holland MI 49424

Dear Bob:

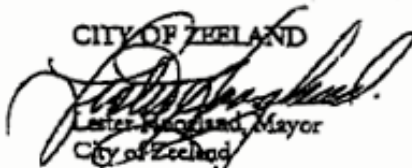
The Zeeland City Council appreciates the efforts of the MACC's Technical Committee and its Ad Hoc Committee on the US-31 study. The Council recognizes the difficulties in assimilating the diverse issues associated with the US-31 study into a recommendation to the MACC Policy Committee.

After review and discussion of the issues, the Zeeland City Council finds itself concurring with the recommendation of the Technical Committee to the Policy Committee. The recommendations show a high degree of understanding of the issues facing the MACC and present a plan for improving safety along US-31 while managing area wide growth. This will ultimately provide a way of linking the federal highway system through our part of the state.

I regret not being able to have a City representative at the Policy Committee meeting to speak for the City of Zeeland. I trust that this letter will serve to represent the City of Zeeland and our support of the Technical Committee in their January 11, 1999, statement of Recommended Future Improvements to the US 31 Corridor.

Sincerely,

CITY OF ZEELAND



Lester Macdonald, Mayor  
City of Zeeland

LH:rb

1

**City of Zeeland, January 18, 1999**

1. Acknowledged receipt of their letter of support for Alternative F/J1. The current PA includes critical segments of F/J1.



102 W. SAVIDGE ST. • SPRING LAKE, MI 49456 • PHONE 616-842-1393

FAX 616-847-1393

January 25, 1999

Mr. Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

**RE: US-31 DRAFT ENVIRONMENTAL IMPACT STATEMENT**  
**STATE PROJECT NUMBER: 33955**  
**FEDERAL PROJECT NUMBER: DPR 0045 (001)**

Dear Mr. Lopez:

This letter is written to communicate the Spring Lake Village Council's comments on the alternatives presented in the US-31 Draft Environmental Impact Statement. The Spring Lake Village Council has concluded that the problems that currently exist in the US-31 Corridor could best be resolved by implementing a three-phased plan comprised of 1) improvements to US-31, 2) construction of a local Grand Haven area bypass and 3) construction of a regional bypass.

Transportation System Management:

The Michigan Department of Transportation has already begun improving the ability of US-31 in the Grand Haven Corridor to handle existing and future traffic by installing "Michigan turns". In addition to these improvements, closing select intersections and better coordination of signaling should be pursued immediately to address existing transportation needs.

Local Grand Haven Bypass (Plr):

The Village Council supports the concept of constructing a local Grand Haven area bypass, including a Grand River crossing, to address both existing transportation needs as well as those created by anticipated growth in the townships surrounding the Tri-Cities (Grand Haven, Ferrysburg and Spring Lake). The bottleneck at the US-31 Bascule Bridge and the M-104 Bridge will not be resolved solely by constructing a regional bypass (Alternative F) or expanding the capacity of US-31 (Alternative A). Local traffic circulating among the communities, as well as traffic using US-31 and M-104 to access the Grand Rapids area, contribute significantly to the

Mr. Jose A. Lopez  
January 25, 1999  
Page 2

traffic problems in Grand Haven and Spring Lake. Although we are aware that M-104 will not be considered by MDOT officials when selecting a preferred alternative, we believe that M-104 will have a significant impact on US-31 as it continues to act as a conduit for traffic heading to Grand Rapids and throughout northwest Ottawa County.

3

This mid-term goal (5-10 years) does not need to be constructed as a controlled access boulevard as proposed in the DEIS. A bypass constructed as a local road with a bridge that presents fewer engineering challenges would address the needs of the US-31/M-104 interchange, reduce the cost of constructing a local bypass and mitigate some of the negative impacts in both Grand Haven Township and the Grand River basin. Additionally, the local bypass should be located east of 144th Avenue in to avoid conflicts with the new Spring Lake Senior High School.

Regional Bypass (F/J1):

Unlike expanding the capacity along the existing US-31 Corridor, construction of a regional bypass can address the need for limited access freeway that will move north-south traffic efficiently and safely while mitigating the potential negative impacts. This long-term solution (10-15 years) is required to respond to the transportation needs of Ottawa County in the future.

4

This option is also important as it will provide for the replacement of the existing bascule bridge with 40' clearance. A fixed-span bridge with a clearance of 65' would be unacceptable at this location due to the negative impact on the cities of Grand Haven and Ferrysburg.

Summary:

These comments reflect the statements made in a resolution adopted by the City of Grand Haven, the City of Ferrysburg and the Village in October, 1994. The Village Council believes that the recommendations contained within this resolution are valid today based upon the findings in the DEIS. Based upon the traffic origin/destination studies, more traffic will be diverted from US-31 in the Grand Haven area by a local bypass. 2020 projections indicate that the ADT at the US-31 Bridge will be reduced 13,400 vehicles by Alternative F/J1, while the ADT will be reduced 17,400 vehicles by Alternative P1r.

Anticipated growth patterns in Ottawa County create a compelling need for the regional bypass. While the regional bypass is necessary to address future growth, this should not preclude the need for a local bypass of the Grand Haven area.

On behalf of the Spring Lake Village Council, thank you for the opportunity to comment on the DEIS.

Mr. Jose A. Lopez  
January 25, 1999  
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew D. Lukasik", written over a large, stylized circular flourish.

Andrew D. Lukasik  
Village Manager

encl.

cc: State Senator Leon Stille  
State Representative John Jellema  
Leon Langeland, Ottawa County Commissioner  
Ryan Cotton, Grand Haven City Manager  
Dennis Craun, Ferrysburg City Manager  
James Jeske, Spring Lake Township Supervisor  
Bill Cargo, Grand Haven Township Manger  
Larry Mason, Spring Lake Public Schools Superintendent



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#### EXCERPTS OF MINUTES

At a regular meeting of the Village Council of the Village of Spring Lake held at 102 West Exchange Street, Spring Lake, Michigan, on the 3rd day of October, 1994, at 7:30 p.m., local time.

PRESENT: Bolthouse, Fonte, Fischer, Donner, MacLachlan, Ruiter

ABSENT: Verplank

The President Pro-tem advised the Council that the next order of business was the consideration of a resolution establishing a joint recommendation of the five Northwest Ottawa County communities regarding the solution of present and future transportation needs.

After completion of discussion, the following resolution was offered by Bolthouse and supported by Fischer:

#### "RESOLUTION"

WHEREAS, the Michigan Department of Transportation has initiated a study commonly known as the US-31 Corridor Study (the Study) and said Study is intended primarily to develop solutions for the improvement of traffic flow along the US-31 corridor in Ottawa County; and,

WHEREAS, MDOT has appointed Greiner Incorporated as project engineer and has assigned them the task of developing a recommended solution based upon the best available traffic, social, environmental and economic data; and,

WHEREAS, Greiner has proceeded to identify three corridors for further study and these corridors have been identified as West (existing US-31), Central (120th Avenue vicinity) and Eastern (84th Avenue vicinity); and,

WHEREAS, the Study was initiated at the request of local units of government and Ottawa County in recognition of the fact that the prosperity and vitality of Ottawa County are threatened by traffic impacts which exceed or soon will exceed the capacity of the existing state and local roadway network; and,

WHEREAS, to the extent traffic exceeds the capacity of our state and local bridge and roadway system, it is a detriment to the quality of life of each of our residents and a threat to the prosperity and economic vitality that is our hallmark; and,

Resolution  
Page 2

Whereas, each of the five units of government in Northwest Ottawa County, including the City of Ferrysburg, the City of Grand Haven, Grand Haven Township, Spring Lake Township and the Village of Spring Lake, all recognize that inasmuch as each community and its residents share in the prosperity of our economy and the benefits of our quality of life, each community must also share responsibility for solutions to regional problems; and,

Whereas, our area has a proven track record of cooperative regional successes that include the North Ottawa Water System, Grand Haven/Spring Lake Sewer Authority, Harbor Transit and economic development; and,

Whereas, it is clear that if our five communities cannot reach a consensus on this critical regional transportation issue, MDOT may defer this project indefinitely to work in areas of the State where there is clear consensus or MDOT may elect to construct improvements that do not meet our collective needs; and,

Whereas, the ACI convened a committee consisting of representatives of the five Northwest Ottawa communities to share thoughts and information concerning the Study, to meet with MDOT officials and to meet with Greiner officials, all with the purpose of determining if some effective regional consensus could be developed regarding both present and future transportation issues and the Study; and,

Whereas, major findings of the committee include the following:

- a) MDOT will work more speedily in regions where there is clear agreement on the transportation objective to be achieved;
- b) Environmental impacts are key considerations in the decision making process and may preclude otherwise desirable options;
- c) The time line for the US-31 Corridor Project will be very long. It is very likely that no construction will begin for 15 years from the date of completion of the Study on an expressway bypass option.
- d) We now face the most severe transportation problems in our history. The US-31/M-104 highway system is over capacity now. The US-31 Bascule Bridge has demonstrated its ability to severely disrupt our region.
- e) Traffic will only get worse. Based on traffic projections prepared by Greiner, our area will become progressively more clogged and congested.
- f) This problem is a threat to the quality of life of the residents of our region. If it is not addressed systematically and on time, our residents, businesses and visitors will suffer;
- g) It is clear that we need to develop a regional consensus where we all share in the solution or we will suffer the inevitable consequences;
- h) Our area requires at least a second local bridge to provide local traffic relief and ensure that emergency services are not interrupted; and,

Resolution  
Page 3

Whereas, the ACI Committee has worked to develop a comprehensive recommendation for consideration by each of the five communities and is prepared to do so in the form of this resolution.

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

1. The ACI study committee has recommended a phased approach to address our regional traffic problem which includes the following stages:

a) Short Term Goal - to be accomplished in three to five years: Request immediate US-31 improvements in the Grand Haven Corridor that could include intersection closings, signal removals, installation of "Michigan turns" and widening and recommend to MDOT that a fixed-span bridge with 35 feet of clearance be constructed over the Grand River.

b) Mid Term Goal - to be accomplished within five to 10 years: That support be given to the creation of a local, "ring-road" system (not an expressway) that adds a local bridge with 35 feet of clearance or a bascule bridge in the most appropriate location when considering all factors in order to handle increased local traffic north and south across the Grand River. The location of the "ring road" would be determined by further study; but it would link M-104 and US-31 and would probably do so in a corridor further South of the currently proposed Robbins Road location. This alternative is not in lieu of, nor can it preclude, the construction of the expressway bypass contemplated in the long-term goal detailed below.

c) Long Term Goal - to be accomplished in 15 to 20 years: That the US-31 bypass should be in a corridor west of 84th Avenue in the vicinity of 120th Avenue. This bypass should link I-96 to the North with either US-31 or I-196 to the South.

2. That this unit of local government hereby accepts and endorses this recommended conceptual plan.

3. That ACI and the ACI Committee are directed to join this unit of government in advocating this concept to MDOT, State and Federal legislators, the Study team and other appropriate audiences. Furthermore, the ACI committee is directed to monitor the Study process and report periodically to member units.

4. That all resolutions in conflict herewith in whole or in part are hereby revoked to the extent of such conflict.

Resolution  
Page 4

5

YES: Fischer, Donner, Bolthouse, Fonte, Ruiter, MacLachlan

NO: None

RESOLUTION DECLARED APPROVED DATED Oct. 3, 1994

Victoria Verplank  
ITS Village President

R. S. Ludwig  
ITS Village Clerk



RECEIVED  
FEB 7 1997

CITY OF FERRYSBURG

102 W. SAVIDGE ST. • SPRING LAKE, MI 49456 • PHONE 616-842-1391

FAX 616-847-1393

### EXCERPTS OF MINUTES

At a regular meeting of the Village Council of the Village of Spring Lake, Ottawa County, Michigan, held at the Barber School Community Building, 102 West Exchange Street, on the 3rd day of February, 1997, at 7:00 p.m., local time, a quorum being present:

PRESENT: Bolthouse, Fischer, James, VanStrate, Draeger

ABSENT: Hall, Hammond

The President of the Village advised the Village Council that the next order of business was consideration of a resolution indicating the Village's commitment to a long-term solution to the U.S. 31 problems.

After completion of the discussion, the following resolution was offered by Councilperson Fischer and supported by Councilperson Bolthouse.

### "RESOLUTION

WHEREAS, the communities of Ferrysburg City, Grand Haven Charter Township, Grand Haven City, Spring Lake Township, Spring Lake Village and the surrounding environs will be significantly impacted by the eventual location of the U.S. 31 improvements; and

WHEREAS, creation of an elevated freeway, surface freeway, or an expanded boulevard through the communities where the existing U.S. 31 now exists will eliminate jobs, impact churches, weaken neighborhoods, threaten park areas, affect community heritage, and reduce property values in amounts totally unacceptable to the 30,000-plus area residents; and

WHEREAS, the governing bodies of Ferrysburg City, Grand Haven Charter Township, Grand Haven City, Spring Lake Township, and Spring Lake Village have each gone on record requesting a U.S. 31 by-pass with a Grand River crossing elsewhere so as to provide an alternate route across the Grand River to more effectively carry the current 58,000 daily vehicles and the 40,000 additional vehicles expected in the next twenty years; and

WHEREAS, such alternate route will protect the lives of our citizens, protect the economic viability of our employers, improve traffic flow for regional and state travelers alike and preserve our communities' neighborhoods, institutions and history;

NOW, THEREFORE, BE IT RESOLVED that the Village of Spring Lake is committed to a long-term solution to the U.S. 31 problem, specifically:

1. The Village of Spring Lake continues to support the construction of a by-pass at, or near, 120th Avenue with a Grand River crossing in a manner which most effectively connects the Holland region to the Muskegon region such that regional and state traffic can quickly, safely, and less obtrusively reach their destinations. (Any other solution short of the above, will prove to be obsolete and ineffective in the long term.)
2. The Village of Spring Lake is disturbed about the unilateral action by MDOT and MDEQ to eliminate the southern spur of former Alternative F that crosses the Pigeon Creek prior to a review in the Environmental Impact Statement due later in 1997, and we hereby request reinstatement of Alternative F as a full option to be researched just as thoroughly as any other option in the Environmental Impact Statement.
3. The Village of Spring Lake is of the opinion that the best long term option, with the greatest transportation benefits, is the July, 1996 version of Alternative F coupled with Alternative J1, to provide a direct interstate link along the shortest route possible between I-196 in Zeeland and I-96 in Nunica. Such transportation benefits justify the increased environmental mitigation costs associated with crossing the Pigeon Creek.
4. The Village of Spring Lake continues to support the concept of a second local crossing in addition to the above, to provide improved access to neighboring communities, to provide emergency access when the bascule bridge malfunctions, and to reduce traffic on M-104 through the Village of Spring Lake.

AYES: Bolthouse, Fischer, VanStrate, James  
Draeger

NAYS: None

Resolution declared APPROVED

Dated this 3rd. Day of February, 1997.

  
 Judith VanBemmelen, Deputy Clerk

**Village of Spring Lake, January 25, 1999**

1. Acknowledged receipt of the Village's letter of support for a three-phased approach: 1) improvements to US-31, 2) construction of a local Grand Haven bypass, and 3) construction of a regional bypass. The Preferred Alternative includes improvements to US-31 and a new regional Grand River crossing, but not a local Grand Haven bypass due to environmental impacts, costs and not addressing the purpose of and need for the project.
2. Acknowledged receipt of support for TSM improvements. MDOT has continued to maintain and improve US-31 with projects such as pavement repairs, intersection reconfigurations, turn lane improvements, and traffic signal optimizing upgrades. As a result, most of the TSM improvements noted have been made.
3. Alternative P1r had many social and environmental impacts and was not chosen as the Preferred Alternative. Therefore, a local bypass is not part of this project.
4. Acknowledged receipt of support for Alternative F/J1 and the replacement of the existing bascule bridge. The replacement of the existing bascule bridge is not part of the current PA. See response #1 above.
5. Acknowledged receipt of resolution dated October 3, 1994. See response 1.
6. Acknowledge receipt of resolution dated February 3, 1997 in support of Alternative F/J1. The current PA includes critical segments of Alternative F/J-1.

RESOLUTION

**WHEREAS**, the Michigan Department of Transportation has recently completed a Draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa, and Muskegon Counties to determine the preferred alternative(s) for addressing traffic congestion on US-31;

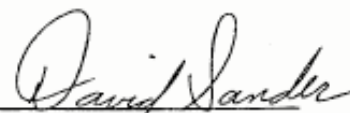
**WHEREAS**, US-31 is a vital transportation corridor for Muskegon County; serves a significant number of commercial and industrial enterprises in the county, and will continue to be an important north-south corridor in the economic development of the West Michigan Region;

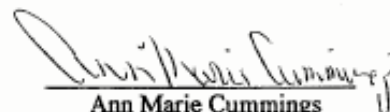
**WHEREAS**, community leaders in Muskegon County representing business, industry, tourism, government, financial institutions, and other interests have organized under the umbrella of a Muskegon County US-31 Blue Ribbon Committee to review the Environmental Impact Study and formulate a Muskegon County position regarding the alternatives under consideration;

**WHEREAS**, the position of the Muskegon County US-31 Blue Ribbon Committee is summarized in the enclosed position paper, which was unanimously adopted by the committee on November 1, 1998;

**NOW, THEREFORE, BE IT RESOLVED** that the City of Roosevelt Park hereby endorses the position of the Muskegon County US-31 Blue Ribbon Committee, and requests the Michigan Department of Transportation enter this resolution into the record of public comments.

Resolution Adopted by City of Roosevelt Park on January 18, 1999.

  
David Sander  
Mayor

  
Ann Marie Cummings  
City Clerk

**City of Roosevelt Park, January 18, 1999**

Acknowledge receipt of resolution supporting the position of the Muskegon County Blue Ribbon Committee supporting Alternative A. This alternative was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**. In addition, please refer to responses provided for the West Michigan Shoreline Regional Development Commission on pages C-112 and C-113.



**NUNICA, MICH. 49448**

***A Recognized Bicentennial Community***

January 7, 1999

Mr. Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning, MDOT  
PO Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

We, as Crockery Township's governing body have, along with Robinson, Olive, and Zeeland Townships, expressed our collective opposition to any 'alternative' to the US 31 traffic problem that places a bypass through the center of Ottawa County.

Our collective position deals with the overall negative effect of a bypass and the reasons we believe the US 31 problems would be best solved by utilizing the existing route. That correspondence, signed by the township supervisor from each of the four townships, is being forwarded to your office under separate cover.

We, the Crockery Township Board of Trustees, would like to address additional concerns regarding present traffic on M-104 (Cleveland Avenue) and any 'bypass' solution proposed along the 120<sup>th</sup> Avenue route in our township.

#### **HISTORY**

When I-96 was extended west from Grand Rapids to Muskegon the highway geographically cut Crockery Township in half. This severed all north/south roads within the township, except 112<sup>th</sup> Avenue. As a result 112<sup>th</sup> Avenue has become the 'cross over' location for north/south traffic within the township. Also as a result of this same action, M-104 became the main route of travel for east/west traffic to and from the Grand Haven tri-city area.

M-104 is the only east/west highway for traffic on and off I-96 with a destination of the Grand Haven tri-city area. The combination of local and other traffic has M-104 at or exceeding full capacity. It is most common during the summer months to have traffic in a 'stop and go' condition in the Spring Lake area, for a distance of up to three miles on M-104.

1

Lopez letter, cont., pg. 2

### FUTURE CONCERNS

The DEIS supports our contention that most traffic on US 31 in Grand Haven is 'local destination' traffic. We continue to believe that a bypass on 120<sup>th</sup> Avenue will not give sufficient relief to Grand Haven's traffic problems.

We do believe that a bypass on 120<sup>th</sup> Avenue will have some adverse effect on traffic distribution attempting to get to the Grand Haven tri-city area from the east and south.

At the present time traffic, destined for the Ottawa County lakeshore area, use four basic routes:

1. M-45 from Grand Rapids to US 31 south of Grand Haven.
2. I-96 to M-104 and west to Spring Lake.
3. US 31 north from Holland.
4. US 31 south from Muskegon.

We expect that people not familiar with the area will conclude that the best and shortest route to the Grand Haven area will be by jumping onto this bypass at some point and taking it to M-104.

We also expect that local traffic from Grand Rapids area will select a route west on M-45 to the bypass north to M-104, and west into Spring Lake.

None of these projected traffic patterns will do anything to solve the existing US 31 problems, but they will have a tremendous negative effect on those communities along M-104 from I-96 west to US 31.

While the city administration of Grand Haven has repeatedly insisted that the bypass option is for the 'through traffic,' their correspondence on this issue would indicate that they expect traffic to use the bypass and M-104 as a route to and from their city. They have in fact pointed out what they consider a design flaw in the DEIS that they feel is detrimental to this pattern and have requested that it be corrected. (Letter dated 12-8-98 from the City of Grand Haven to your office.)

### INTERCHANGE EVALUATION – I-96 and 120<sup>th</sup> Bypass

In the event that a bypass on 120<sup>th</sup> Avenue was to be selected, we find the engineered design as shown in the DEIS for Crockery Township unacceptable for the following reasons:

1. The current traffic capacity for 112<sup>th</sup> Avenue (Main Street) does not allow for additional traffic, in the volume the bypass is expected to generate. Particularly traffic attempting to go west on M-104.
2. The merging of traffic on the west bound M-104 and exit ramp #9 of west bound I-96 onto M-104, is already considered the most dangerous intersection within the township. It is in need of additional engineering as it exists today.
3. Any attempt to route traffic from a bypass into M-104 will require a major interchange that has not been considered in the DEIS. This additional cost would further reduce the 'dollar return value' of this alternative.

Lopez letter, cont., pg. 3

In summary, it would appear that the desires of the Grand Haven City Officials to have a bypass on 120<sup>th</sup> Avenue would, at best, take a north/south problem through Grand Haven and further complicate it with an east/west problem on M-104 through Crockery Township, Spring Lake Township, and the Village of Spring Lake. It also appears that Grand Haven officials are aware that additional traffic is likely to use M-104 to arrive at their city.

It is also likely that realignment of the traffic with a destination to the Grand Haven area is likely to adversely effect those businesses along the existing route of US 31 without subsequently improving the problems existing on US 31 in Grand Haven. An attempt to dump traffic from two interstate highways onto a two lane state highway is not realistic considering the volume of traffic projected to use this route. Major traffic problems in the future on M-104 will present fewer options for a solution that the US 31 route through Grand Haven offers at this time.

Thank you for taking the time to review our concerns. We appreciate your attention to this matter.

Sincerely,

Mike Fortenbacher  
Supervisor



Rex Burkall  
Trustee



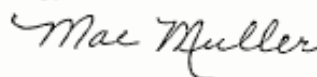
Tom Holmes  
Trustee



Larry VanDussen  
Treasurer



Mae Muller  
Clerk



Copies of this letter have been sent to the following individuals or organizations:

City of Grand Haven  
Spring Lake Township  
Village of Ferrysburg  
Village of Spring Lake  
R. Christopher Byrnes, Ottawa County Planning Commission  
Betty Gajewski, Ottawa County Planning Commission  
Ed Hanenburg, Ottawa County Planning Commission  
Joseph Haveman, Ottawa County Commission/Land Use Committee  
Luciano Hernandez, Ottawa County Commission  
Michael Jaeger, URS Greiner  
Jon Jellema, Michigan House of Representatives  
Robert Karsten, Ottawa County Commission  
Jim Kirschensteiner, Federal Highway Administration  
Mark Knudsen, Ottawa County Planner  
Leon Langeland, Ottawa County Commission/Land Use Committee  
D. Dale Mohr, Ottawa County Commission  
Robert Rinck, Ottawa County Commission/Land Use Committee  
Roger Rycenga, Ottawa County Commission/Land Use Committee  
Jeff Saxby, MDOT  
Harris Schipper, Ottawa County Commission  
Gordon Schrotenboer, Ottawa County Commission/Land Use Committee  
Robert Sewick, Ottawa County Planning Commission  
Leon Stille, Michigan State Senate  
Dennis Swartout, Ottawa County Commission  
Cornelius Vander Kam, Ottawa County Commission  
Frederick Vander Laan, Ottawa County Commission

**Crockery Township, January 7, 1999**

1. Acknowledged receipt of the township's concerns regarding traffic on M-104 and its opposition to a 120<sup>th</sup> Avenue bypass. Traffic modeling projections for the year 2030 show that volumes on M-104 will actually decrease with the construction of the Preferred Alternative. In addition, the Preferred Alternative includes widening on M-104 to five lanes from 130<sup>th</sup> Avenue to I-96. Since this letter was written, MDOT has met with and received support for the Preferred Alternative.
2. Traffic volumes on 112<sup>th</sup> Avenue are expected to decrease as a result of the Preferred Alternative.
3. The westbound I-96 to westbound M-104 ramp has been upgraded since 1999, and now includes a deceleration lane that allows ramp traffic to slow and then merge with M-104 traffic. The Preferred Alternative converts this deceleration lane into a new through lane that extends to 124<sup>th</sup> Avenue.
4. The Preferred Alternative has an at-grade intersection with M-104 rather than an interchange, and is included in cost estimates for this project.
5. The Preferred Alternative includes improvements on existing US-31 in Grand Haven.

The Joint Township Committee Against the Bypass  
c/o Robinson Township Hall  
12010 120<sup>th</sup> Avenue  
Grand Haven, MI 49417

January 22, 1999

Mr. José A. López  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department Of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Re: FHWA-MI-EIS-98-01-D -- US31 Draft Environmental Impact Statement

Dear Mr. López:

In attending meetings, reading news quotes attributed to local elected officials, and reviewing copies of letters addressed to your office from local government units, it is apparent to us that the following is true:

1. Officials of the City of Grand Haven, as well as most Ottawa County Commissioners, have not formulated a total plan that is acceptable to them to handle the traffic problem within the City of Grand Haven on US31.
2. They continue to push for a bypass along 120th Avenue while ignoring a great amount of evidence that indicates this will not solve a sufficient amount of the existing and projected traffic problems on US31. They also have refused to present a traffic plan for the City of Grand Haven except for a suggested detour of some traffic within the City. To our knowledge, no traffic engineering study has been done to provide any evidence this suggested detour will be of any real value if implemented. Their suggestion also fails to address the negative impact on the myriad small businesses and homes along this possible internal bypass route.
3. It has been repeatedly suggested by some Grand Haven officials that a bypass on 120th Avenue or at least a bridge over the Grand River on 120th Avenue should be built regardless of the information provided by the DEIS that does not support this as a total solution. These comments go on to suggest that if this "does not work within a year or so", then they would consider doing something in Grand Haven. We have heard no mention of duplication of costs if the plan does not work.

As you are well aware, there are additional problems and considerations associated with the traffic problems on US31 in Grand Haven which make this attitude unacceptable. The traffic on M104 from I-96 west through Crocker Township, Spring Lake Township, and the Village of Spring Lake is already a problem which must be addressed at some point. Without some increase in the efficient movement of traffic on US31, there are not a lot of options to address the M-104 problem.

Even a second bridge over the Grand River on 120th Avenue is likely to do little to help under these conditions. Without an infrastructure of county roads to this new bridge, it will be of no value.

Joint Township Committee Against a Rural Bypass  
An "Alternative Modification" Suggestion  
1/22/99

**A Reconstructed Alternative**

We would like to offer this as a possible "phase-in alternative". We are offering this in view of the fact that both Grand Haven and Holland have been reluctant to accept Alternative A at this time.

1. Complete the Alternative A from the north city limits of Holland to the south city limits of Grand Haven.
2. Incorporate into this modified Alternative A the controlled access boulevard as suggested in P/P1r from the expressway on the south side of Grand Haven in the area of Comstock Street, around Grand Haven, across the river (an additional bridge), and around Spring Lake, following the route drawn in your DEIS to I-96 in Crockery Township.
3. Allow Grand Haven to try those adjustments within their city that they think will work. The City of Grand Haven should agree that if their plans do not prove efficient that work would begin to complete the expressway to M-104 on the existing route. Holland should be offered a similar agreement.

**Supporting Facts**

1. Large retail stores, car dealerships, new housing, and industrial businesses are moving in a consistent pattern south out of Grand Haven toward Holland.
2. Spring Lake Village, Spring Lake Township, and Crockery Township residents who shop locally have and will continue to drive south through Grand Haven to shop and work.
3. A bypass around Spring Lake and Grand Haven to an area south of Robbins Road will give Grand Haven relief with through traffic to Holland and points south which originates north and east of the Grand River.
4. This will give Ottawa County the second bridge they want in a location which will much better serve the heavy population areas on both sides of the river. This is more realistic for emergency purposes.
5. This solution will address the problem of what to do with the M-104 traffic between I-96 and US31.
6. A large amount of the truck traffic on M-104 is going to shops, stores, and factories south of Grand Haven. (Our survey shows tractor trailer trucks on M-104 passing an observation point at the rate of one each minute and a half during the working day.)
7. Both Grand Haven and Holland will have the time to fully evaluate what they want for their city.
8. We believe that as the highway is built between the cities, the factories, shops, stores, and new homes will continue their steady move to the south and north. We also think that trend will put to rest the concern that local business and residential tax base will be lost to the County or the State.

Joint Township Committee Against a Rural Bypass  
An "Alternative Modification" Suggestion  
1/22/99

**Negative Considerations**

1. We are aware that any alternative must ultimately meet the criteria of the Federal Highways program. We feel that this particular highway problem may be unique enough to give justification for adjustment in the rules.
2. This highway will not connect directly to any interstate freeway at this time. It could be argued that the alignment is present for that connection at some future time if needed. (Or, possibly, consider making the Cornstock bypass and river crossing a freeway instead of a boulevard, which would achieve a connection at one end.)
3. Without being completed through the Cities of Holland and Grand Haven, this revised alternative may not meet the need for traffic relief through 2020. It would, however, provide immediate relief at two critical points - M-104 and US31 through Grand Haven.

**Summary**

We are presenting this in an effort to find something which is acceptable to the Cities of Grand Haven and Holland which also addresses several related needs.

We are concerned that this opportunity to solve a major traffic problem in Ottawa County may not present itself again in the near future. We would hope that some adjustment could be made that would not allow this one short section of highway through Grand Haven to scuttle the entire project.

We have also taken into consideration the recent indication that the Village of Spring Lake shows a desire for the P/P1r bypass around its Village.

Thank you for considering this submission.

Sincerely,



Ray Masko  
Supervisor, Robinson Township  
On behalf of the Joint Township Committee Against the Bypass - Robinson, Zeeland Charter,  
Olive, and Crockery Townships

cc: Ottawa County Planning Commission  
Other Involved Units, Institutions, and Individuals

**JOINT RESOLUTION of OLIVE, ROBINSON, & CROCKERY TOWNSHIPS**

Submitted to Michigan Department of Transportation, March 25, 1997  
With references to MDOT's Draft Environmental Impact Statement, November 5, 1998

1. WHEREAS, the Michigan Department of Environmental Quality previously stated that the 120th Avenue corridor should be excluded from consideration; and

**[DEIS p.9-5, statement from MDEQ.]**

2. WHEREAS, freeway construction will have detrimental effect on the Pigeon River watershed and vast additional areas of wetlands; and

**[DEIS p.5-65, table 5.7.3-2b, Alt F = 89.96 acres, most among 8 alternatives.]**

3. WHEREAS, archeologists working for MDOT have discovered Native American burial sites within the 120th Avenue corridor north and south of the Grand River and have properly concluded that these sacred sites should not be disturbed; and

**[DEIS p.5-88, MDOT shifted the alignment, but see also p.6-51 and p.5-31.]**

4. WHEREAS, a freeway along the 120th Avenue corridor, like other proposed rural corridors, will take thousands of acres of farmland out of production in the #1 agricultural county in the state, to the economic detriment of family farms as well as the county and the state; and

**[DEIS p.5-36, prime, unique, and locally important farmlands impacted: Alt F = 1,940 acres, Alt F/J1 = 2,040 acres; see also p.5-31, Robinson Twp would lose an additional 1,600 acres due to secondary impacts.]**

5. WHEREAS, the land taken out of production along the 120th Avenue corridor, or other proposed rural corridors, will be taken off the property rolls to the further detriment of the region; and

**[DEIS p.5-6 and table 5.1-4, Alt F = \$218,900; see also p.6-4, no relocation assistance for agricultural property.]**

6. WHEREAS, secondary development near any freeway proposed for this or other rural corridors will cause unwanted and uncontrolled growth - urban sprawl - with increased traffic at interchanges that will require road improvements without providing the funding for such improvements; and

**[DEIS p.5-21 for discussion of Ottawa County Development Plan, 1992, see figure 5.2-3.5.]**

7. WHEREAS, a new freeway along the 120th corridor or any other proposed corridors, rural or urban, will create a major noise pollution problem for residents, resulting in a loss of peace and quiet; and

**[DEIS pp.6-16 to 6-18, and note that noise impacts will not be abated unless townships pay, p.6-9.]**

8. WHEREAS, there will be a variety of additional negative impacts of the freeway on existing land use proximate to the proposed freeway, such as dead ending roads, and denying access to part of an owner's property due to the freeway cutting through that property; and

**[DEIS Appendix A, aerial photos of freeway and boulevard alternatives for dead end roads and fragmented farms.]**

9. WHEREAS, a new freeway along the 120th corridor, or other proposed rural or urban corridors, will eliminate neighborhoods, split communities, and negatively impact the quality of life; and

**[DEIS p.6-61 reminds us that land use planning is up to local townships.]**

10. WHEREAS, federal law prohibits the construction of transportation projects that decrease air quality in areas that are technically categorized as having air quality problems having to do with moderate non-attainment for ozone; and

**[DEIS p.5-39 notes that the conformity determination will be made after an alternative has been selected.]**

11. WHEREAS, the proposed bypass will not alleviate traffic congestion along US-31 since the majority of the congestion is south of New Holland Street or north in Grand Haven; and

**[DEIS p.3-7, "The new-alignment freeway does not decrease demand on existing US-31 enough to attain acceptable LOS (Level of Service) on existing US-31. Existing US-31 would require capacity increases in order to attain an acceptable LOS."]**

12. WHEREAS, the old highway will still have to be improved if a new one is built, and both new and old roads will have to be maintained; and

**[DEIS p.3-9.]**

13. WHEREAS, while western Ottawa County may well be significantly and negatively impacted by the suggested US-31 improvements, a new highway will not solve growth and traffic problems but rather will be the agent for even more rapid and excessive growth in the county that will lead to far greater problems; and

14. WHEREAS, there have been no other models studied except construction of a new freeway;

NOW, THEREFORE, BE IT JOINTLY RESOLVED, that the Townships of Crockery, Olive and Robinson, County of Ottawa, State of Michigan are committed to a long-term solution to the transportation problems of west Michigan, specifically:

1. The 120th Avenue corridor is an unacceptable alternative and should be dropped from further consideration for the US-31 bypass. This reaffirms prior decisions and procedures of MDOT and MDEQ, the state agencies having authority in these matters.

2. The proposed new freeway will add to the economic and social problems of the Lakeshore region, rather than alleviating them, so it is not an appropriate investment for the State of Michigan in any west Michigan location.

3. Other alternatives to improving transportation in the area deserve careful consideration on the part of suitable official state agencies, beginning immediately.

The Joint Township Committee Against the Bypass  
c/o Robinson Township Hall  
12010 120<sup>th</sup> Avenue  
Grand Haven, MI 49417

January 6, 1999

Mr. José A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department Of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Re: FHWA-MI-EIS-98-01-D – US31 Draft Environmental Impact Statement

Dear Mr. Lopez:

As Township Administrators, we recognize the difficulty in interpreting the many emotional responses from those concerned with all the possible solutions to the US31 problem. Because the alternatives affect our county, townships, citizens, and future, we share many of those same concerns.

We have individually, within our Townships, as well as within our Joint Committee Against the Rural Bypass coalition of Townships, reviewed the DEIS in great detail. A summary of our findings and views are as follows:

1. This study **very accurately defines the existing traffic problems** as we see them at present. It also gives a complete projection of what the future could hold for this highway, based on data provided to MDOT and Greiners by the City and County Planners in Ottawa County. We find no reason to doubt those projections.
2. This study shows that the existing traffic problems must be **dealt with at their present location**. Also, that any attempt to **relocate** this traffic is **not going to be sufficient** to solve the traffic problems, now or in the future.
3. The City of Grand Haven has stated that a limited access highway will cause an excessive loss of homes, businesses, and boulevard median. However, this loss will not be any more drastic than will be required with any **sufficient improvement** to the existing route as a boulevard, as pointed out in the DEIS. The City of Grand Haven will be required to lose some land with every **viable** solution to their traffic problem.

(cont'd)

Joint Township Committee Against a Rural Bypass  
DEIS Response Position and Fact Sheet  
1/6/99

4. The study shows that a bypass placed in the center of Ottawa County **will change the development pattern drastically**, while not necessarily changing the growth of Ottawa County. It would likely lead to the relocation of existing families and businesses in a pattern consistent with any new roadway, further encouraging sprawl and the **loss of much more farmland** than the original right-of-way acquisition would consume.
5. The primary and secondary effects of a bypass on farmland in Ottawa County will result in a **loss that is irreplaceable**. Any loss of homes, businesses, and shops in the urbanized areas will not be permanent, as they can be relocated. The study shows sufficient land available for these relocations in the immediate area affected. However, once gone to development, farmland cannot be replaced and farms cannot relocate.
6. The total dollar return value is **considerably higher on the existing route**. The **negative impact is higher** on all factors involving a rural bypass solution or alternative.

While understanding the concerns of Grand Haven City Administrators in fearing any change to the esthetics of their boulevard, the fact is that this corridor through Grand Haven has been going through constant transition for at least thirty years. Homes have been removed or turned into offices, chain stores have closed or moved, and shops have relocated. Even at the present time major changes are taking place.

The disruptions caused by doing what is necessary in Grand Haven will be offset by the long-range and immediate advantages to the City.

Growth along the existing route of US31 is likely to continue in the future with or without a new highway. The problems with traffic on this route will have to be addressed in the near future.

By placing a bypass through the center of our county, we will be starting **another major line of development parallel** to the existing route. This will call for a **grid of east/west roadways**, developing a "ladder effect" of primary county roads/highways through the county to connect the two highways. Those connecting roadways will also call for improvement and upgrade, putting an **unbearable financial burden** on the residents of the rural townships.

This grid of improved east/west roads will, further, bring tremendous pressure to develop the farmlands in those areas and **lead Ottawa County to suffer the sprawl** that other areas of the state have experienced, as demonstrated in Wayne, Oakland, and Macomb Counties.

As Township Administrators in Ottawa County, we have, along with County Planners, given considerable thought and effort to planning for our future. We have given a priority to preserving those irreplaceable resources that are vital to our future prosperity, as documented in the 1992 Ottawa County Development Plan as well as in several Township Master Plans.


We request that the Michigan Department of Transportation take into consideration this statement, as well as the attached data sheets which are comments on excerpts directly from the DEIS. We realize that members of your staff are also evaluating the information in the DEIS, but perhaps our list of reference materials will make a contribution to the effort.

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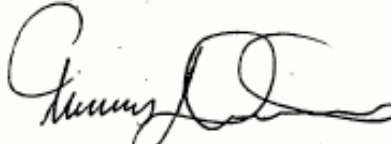
Joint Township Committee Against a Rural Bypass  
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In light of all the information we've gotten from the DEIS, as a Joint Committee, and as individual Townships, we support Alternative A, the freeway on the existing route, as the only solution for the traffic congestion on US31. Please feel free to contact any of us should you have questions.

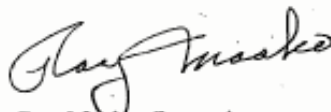
**For the Boards of Trustees:**



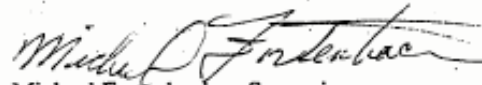
Gordon Ellens, Supervisor,  
Zeeland Charter Township  
6582 Byron Road  
Zeeland, MI 49464  
(616) 772-6701



Tim Dykstra, Supervisor,  
Olive Township  
6480 136<sup>th</sup> Avenue  
Holland, MI 49424  
(616) 786-9996



Ray Masko, Supervisor,  
Robinson Township  
12010 120<sup>th</sup> Avenue  
Grand Haven, MI 49417  
(616) 846-2210



Michael Fortenbacher, Supervisor,  
Crockery Township  
17431 112<sup>th</sup> Avenue  
Nunica, MI 49448  
(616) 837-6868

cc: Ottawa County Planning Commission  
Ottawa County Commission Land Use Committee  
Other Involved Units, Institutions, and Individuals

Following: DEIS Facts (2 pgs.)

Joint Township Committee Against a Rural Bypass  
DEIS Response Position and Fact Sheet  
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1. Grand Haven has a traffic problem on US 31 at the present time that must be addressed. (DEIS page 2-5)
2. That traffic problem will remain and continue to increase in the future unless action is taken. (DEIS page 2-14)
3. **No local or regional bypass is going to give sufficient relief to the traffic problem on US31 at the Grand River without an increase in the capacity or a decrease in the demand on the existing US 31.** (DEIS page 3-7) [A look at the traffic projections will tell you that a bypass solution is not the most effective way to decrease demand on the US 31 route.]
4. Beacon Blvd. is going to be changed no matter which alternative is selected. If the Comstock Bypass (boulevard bypass) is selected, Beacon is slated to become a 6-lane boulevard (DEIS 3-22). If Alternative F (one Central Bypass option) is selected, Beacon is slated to become an 8-lane boulevard (DEIS figure 3.3-5b)
5. The total number of bridge malfunctions from 1988 through May 15, 1997 was ten. One failure resulted in 18 hours, 15 minutes of down time for the bridge. This does not list those incidents which stopped traffic due to accidents on or near the bridge resulting from bridge openings. (DEIS page 2-14) [The problem is not just malfunctions. Any mechanical bridge is subject to high maintenance needs and failures, and contributes to traffic congestion.]
6. All 2020 alternatives except the No Action Alternative **would take approximately the same amount of land through Grand Haven** to increase traffic volume. (Appendix A – Plans of Practical Alternatives)
7. The **rate of return on dollars invested** varies widely: for example, Alternative A (limited-access highway on the existing route) returns \$2.78 for every dollar spent; Alternative F (one central bypass limited-access option), returns \$0.98; and Alternative P (boulevard option on existing route), returns \$0.42. (DEIS page 5-106) [Note: any return of less than \$1.00 means the construction costs on the option exceed the benefit provided.]
8. A central bypass would be directly contrary to the **1992 Ottawa County Development Plan** adopted by the County Planning Commission on December 22, 1992. This Plan relegates Agricultural and Rural Preservation Land to their defined "Tier B". One of the stated goals of this Plan is **"to maintain the rural character of Tiers A and B"**. (DEIS page 5-20 and 21, and Figure 5.2-2)
9. Ottawa County is the **leading county in Michigan in the market value of agricultural products sold** (DEIS 4-4).

(cont'd)

Joint Township Committee Against a Rural Bypass  
DEIS Response Position and Fact Sheet  
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1. Relating to "Community Cohesion": the F and F/J1 (rural freeways) would divide the communities of Zeeland, Olive, and Robinson Townships due to closure of roads in the local road system, causing longer travel distance for accessing community facilities, for farmers traveling to separated fields, and for police, fire, and EMT services. Alternatives F and F/J1 would also have adverse impacts within Grand Haven, since the rural freeway alternatives would still result in either a 6-lane or an 8-lane boulevard in Grand Haven. (DEIS 5-2 and 5-3)
2. Alternatives F, F/J1, and J1 have high numbers of major agricultural displacements. Major agricultural displacements are properties in which the homestead or over 50% of the property is acquired. The majority of these displacements are cropland concentrated along the proposed freeway at 120th Avenue. (DEIS 5-17)
3. Alternatives J1, F/J1, and F have the most major industrial displacements. Major industrial displacement are properties where the main building or over 50% of the property is acquired. (DEIS 5-17)
4. Some shift in land use and development patterns would be expected to occur within Ottawa County with any of the build alternatives, and especially with alternatives utilizing a bypass. Secondary and cumulative impacts projected through 2020 on land use is greatest on all alternatives that involve a new alignment freeway [rural bypass]. (DEIS 5-26 and 5-27)
5. J1, F/J1, and F conflict the most with the Ottawa County Development Plan as outlined based on Policy Tiers, developed in December of 1992. Alternatives A, P, and P1r are the most compatible with these policies. One of the stated goals of this plan is to maintain the rural character of Tiers A and B and preserve farmland. (DEIS 5-20 and 5-21)
6. Alternative J1 would not contain urban sprawl to the south and west of the freeway in the Holland and Zeeland area, as was hypothesized during the public involvement process. (DEIS 5-30)
7. The bypass portions of Alternatives F, F1/F3, F/J1, and J1 would have the most direct impact on farmlands. (DEIS 5-34)
8. Indirect Impacts: "... design of alternative alignments (bypasses), interchanges, and cul-de-sacs of local roads has focused on minimizing the land-locking of farm parcels, parcel fragmentation, i.e., leaving uneconomical remainders, and adverse travel distances due to access changes" ... especially along alternatives F, F/J1, and the bypass portions of F1/F3 and J1. (DEIS 5-34)

**Joint Resolutions of Olive, Robinson, Zeeland and Crockery Townships, January 6 & 22, 1999**

Acknowledged receipt of letters and resolutions in support of Alternative A. This alternative was not selected for the reasons documented in **Chapter 3**. Since the release of the DEIS, MDOT has met with representatives of these townships on the following occasions in order to involve them with the planning process:

- September 8, 1999
- February 25, 2000
- May 3, 2000
- August 21, 2000
- October 16, 2000
- October 18, 2000
- October 24, 2000
- December 12, 2000
- January 5, 2001
- August 23, 2005
- September 1, 2005
- September 13, 2005
- September 16, 2005 – City of Ferrysburg
- September 16, 2005 – Spring Lake Township
- September 16, 2005 – Spring Lake Village
- September 21, 2005 – WestPlan (Muskegon) MPO Technical and Policy Committees
- September 28, 2005 – Ottawa County Road Commission
- September 28, 2005 – City of Wyoming Water Service District
- September 29, 2005 – Grand Haven Township
- October 1, 2005 – City of Grand Rapids Water Service District
- August 23, 2006 - Ottawa County Board and staff and State Legislators, with MDOT Director and staff
- March, 2006 - Ottawa County Planning Department
- October 1, 2006 – North-Bank (Grand River) Committee
- February, 2007 – Ottawa County Planning
- April 18, 2007 - Ottawa County Planning, Board members and property owners
- May 22, 2007 – Ottawa County Non-Motorized Trail group
- September 5, 2007 – Ottawa County Road Commission and Planning Department staff

(Several additional MPO, local community and property owner meetings we also held in 2006 and 2007, others are planned later this year, related to the project.)

There are many points made in these resolutions. The following is a summary of their concerns and the response to the concern.

The townships were concerned that City of Grand Haven officials had not determined how they wanted to address traffic issues on US-31 through the City.

1. Since the DEIS was released, MDOT has worked closely with City of Grand Haven officials to develop a solution with improvements along US-31 through the City. The results of these meetings and the resulting agreements are contained at the end of this chapter in the following two letters:

- MDOT letter from the City of Grand Haven dated October 25, 2001.
- City of Grand Haven letter to MDOT dated November 19, 2001.

Subsequent meetings further refined the issues and led to the conclusion of improvements on existing US-31 that are part of the Preferred Alternative. The townships were concerned that a second Grand River crossing at 120th without infrastructure of county roads would do little to alleviate traffic issues.

The following improvements were included in the Preferred Alternative to address the township's concerns:

- The construction of a new 2-lane bridge over the Grand River near 120th Avenue.
- The construction of a two-lane roadway connecting the bridge over the Grand River to M-45 and M-104.
- Improvements to M-104 include a five-lane reconstruction on existing M-104 between 124th Avenue and I-96 in Crockery Township.
- New ramps at 112<sup>th</sup>/I-96 to complete the existing partial interchange.

The townships cite the 1992 Ottawa County Development Plan which has a stated goal "to maintain the rural character" of portions of Ottawa County.

2. Since the DEIS was released, the Ottawa County Planning and Grants Department issued a report titled "US-31 Staff Position Paper" dated January 22, 1999. The report concludes "By carefully analyzing each of the Alternatives by category, it is clear that the best choice to alleviate traffic and safety problems is Alternative F/J1." In addition, the Ottawa County Board of Commissioners approved a motion "To approve the US-31 Staff Position Paper and its recommendation for a F/J1 alignment and forward a copy of this resolution to the Michigan Department of Transportation" on January 27, 1999. The current PA includes critical segments of F/J-1.

The townships were concerned with dividing the townships due to the closure of roads in the local road system.

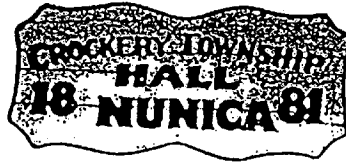
3. MDOT has worked with the townships since the release of the DEIS to minimize this to the greatest extent possible. The proposal alignment, which is a new route (M-231) has intersections with all the cross streets along the new alignment except for North Cedar Drive and Leonard Street where bridges will be constructed and Johnson Street which will be reconstructed as a cul de sac.

The townships were concerned with the number of direct impacts to farmland and the amount of urban sprawl that may result from a rural bypass. Since the DEIS was released, the amount of direct impacts to farmland is 115.8 acres.

4. MDOT commissioned MSU to perform a land use study to address these concerns. The US-31 Land Use Study is included under a separate cover. The US-31 Land Use Study

conducted by MSU concluded that the conversion of land from open/agricultural to built areas has in the past without M-231 and will continue to occur in Ottawa County due to the economic climate of the area and access to Grand Rapids. The proposed road location has little effect on the location of potential new built areas.

The construction of the Preferred Alternative's new alignment will require 53 full parcel acquisitions and 25 partial parcel acquisitions. The design of the Preferred Alternative has focused on minimizing the landlocking and fragmentation of parcels to the greatest extent possible.



*A Recognized Bicentennial Community*

Mr. Mike Jaeger, Project Engineer  
URS Greiner, Inc.  
3950 Sparks Drive SE  
Grand Rapids, MI 49546

November 27, 2000

Dear Mr. Jaeger,

On behalf of the Crockery Township Board of Trustees, the Planning Commission and myself, I would like to thank you for appearing, along with MDOT officials, to further explain the proposed F/J1 Bypass alignment in Crockery Township.

For your files we are submitting a list of our objections that continue to stand following that meeting. We are particularly concerned with the designed interchange for I-96, M-104 and the proposed bypass. The statement from one MDOT official that it "meets minimum standards" would give it an even higher rating than we would have judged. Factor in a realistic evaluation of the existing traffic conditions and problems and it would be further lowered in its standards of an acceptable design. We believe an interchange of this importance should start off by meeting the maximum standards as time and traffic growth will continue to reduce its effectiveness.

As we acknowledged in this meeting, you and your company are limited by the amount of usable space in which to place this interchange. We, as Township officials, would be remiss in allowing this to proceed without objecting on behalf of those citizens whose lives and safety will be endangered.

CROCKERY TOWNSHIP'S ORIGINAL OBJECTIONS TO THE BYPASS

1. It will not fulfill the purpose and need of the project.
2. It will destroy too much farmland, damage the environment, and encourage sprawl.
3. It will greatly increase traffic on M-104 through Crockery Township, Spring Lake Township, and the Village of Spring Lake. This roadway is already identified as the second most highly traveled roadway within the study area for traffic accidents behind US-31, which is number one.

CROCKERY TOWNSHIP'S OBJECTIONS TO THE NEW ALIGNMENT MAP

1. It will not fulfill the purpose and need of the project.
2. It will destroy too much farmland, damage the environment, and encourage sprawl.

1a  
1b

Objections-New Alignment-continued

- |   |    |
|---|----|
| 3. The new alignment disrupts one of the last undisturbed marshlands in West Michigan. Any structure of this type will do major and permanent damage to this environmentally sensitive area.  | 1c |
| 4. The proposed bypass will increase traffic on the M-104, I-96, and the proposed US-31 bypass has a number of design features that are unacceptable for Crockery Township, for safety reasons. We question whether the design features are taking into account the present traffic volume, along with the history of fatal and personal injury accidents at this location. This design not only does not address those conditions, but proposes to add additional traffic, entrance ramps and cross-over turns with some additional visual obstructions. | 1d |

CROCKERY TOWNSHIP'S SAFETY CONCERNS FOR THE NEW PROPOSED US-31 BYPASS.

- |   |    |
|---|----|
| 1. The entrance ramp from northbound US-31 bypass for west bound M-104 is too close to the exiting ramp of I-96 onto westbound M-104. We continue to have accidents related to high speed traffic coming off this ramp onto M-104.  | 2a |
| 2. Additional problems arise when other traffic from the eastbound lanes of I-96 exit onto westbound M-104 must also enter this high speed lane within a short distance.  | 2b |
| 3. While the merge problem would normally be solved with the M-104 and the westbound I-96 ramp onto M-104 by providing two lanes, the placing of two or more entrance ramps onto this same lane in the very short distance will ultimately result in rapid land changing thereby giving us the same problem with even more traffic. | 2c |
| 4. It appears that some obstruction of view will occur by bridge abutments where the eastbound I-96 ramp onto westbound M-104 takes place into this same high speed land.   | 2d |
| 5. The northbound interchange of 120 <sup>th</sup> Ave. is also too close to these same entrance ramps, particularly in view of the fact that two businesses have a continuous flow of double bottom semi trucks involved in the business.  | 2e |
| 6. These same double bottom, gravel hauling, semi trucks would be required to make a "Michigan turn" or U-turn between the two bridges and cross two lanes of traffic to go to and from their terminal.   | 2f |
| 7. Any traffic using this cross over to go north on 120 <sup>th</sup> Ave. in an improper manner would leave drivers on westbound M-104 with no chance to take evasive action due to the bridge abutments.  | 2g |
| 8. Traffic leaving the Nunica Cemetery and desiring to go east would have to go west and make a U-turn someplace beyond the boulevard area. This would also apply to two homes and five businesses on the north side of M-104.  | 2h |

Safety Concerns-continued

9. We consider the exit ramp from northbound US-31 bypass onto M-104 to be of an unsafe design for this particular area due to the continued "lake effect" snow that continues during the winter months. "Whiteouts" and icy bridges are a common condition. This design requires braking for a 200 degree ramp that has a steep decline while on the bridge overpass of M-104 and we feel this will lead to many accidents.
10. We also question the location of the "Park & Ride" because it requires cross traffic at poor locations. It will also be used most often when M-104 is at its peak traffic hours.
11. For reasons we do not understand, the section of I-96 from the entrance ramp of east bound M-104, to approximately the Crockery Creek bridge, has an unduly large number of accidents during the winter months. Most are loss of control with many roll over accidents. While this is not of your making, it is a fact that can be substantiated and should be factored into your construction safety design. We question the use of a cross over design for this location with "on traffic" being required to cross through "off traffic". While this over on/off ramp is used a lot in your designs in Michigan, most drivers consider them a poor design.

2i

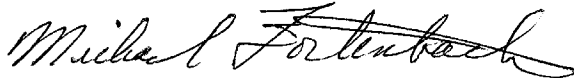
2j

2k

Crockery Township has and will continue to oppose this proposed bypass for the previously listed reasons. Our overall view continues to be that this is not an area suited with enough land to be able to place this number of ramps and other traffic configurations with sufficient distance for a reasonable factor of safety in a new highway interchange. On behalf of our residents we will work with you to provide whatever assistance possible to assure that any bypass that is built would provide the best design possible for our needs and safety.

Please feel free to call upon myself or any Crockery Township Board Member at any time.

Sincerely,



Michael Fortenbacher, Supervisor  
Crockery Township

**Crockery Township, November 27, 2000**

1. Crockery Township's Objections to the New Alignment Map

- a. The Preferred Alternative modified from F/J1 meets the Purpose and Need of the project, in that it reduces traffic congestion and the safety issues associated with congestion along US-31, and improves access within the study area.
- b. The Preferred Alternative has been modified and will minimize impacts to farmland and the environment. M-231 will be limited access, with controlled access at the intersection which means that driveways and new cross streets will not be allowed on it. This will minimize opportunities for new development (sprawl) along M-231.
- c. Impacts to wetlands have been minimized as part of the FEIS, and are now less than three acres.
- d. The proposed M-231 is projected to lead to an increase in traffic on I-96, and a small decrease on M-104. See reply two for the design feature discussion.

2. Crockery Township's Safety Concerns for the New Proposed US-31 Bypass – the proposed I-96/M-231/M-104 interchange has been revised since the DEIS, and many of the Township's concerns have been addressed:

- a. The interchange proposed at the DEIS did not include a northbound bypass to westbound M-104 movement. This interchange has been revised in the Preferred Alternative to a signalized intersection.
- b. The existing eastbound I-96 off ramp to Cleveland Road will be eliminated and replaced with a new off ramp to M-231.
- c. A merge lane was constructed after the DEIS for the westbound I-96 to westbound M-104 movement. Additional lanes on M-104 west to 124<sup>th</sup> Avenue as part of the Preferred Alternative.
- d. The proposed M-231 will not bridge over M-104. Instead, the eastbound off ramp will terminate on M-231 and then lead to a signalized intersection at M-104.
- e. The north leg of 120<sup>th</sup> Avenue will not be relocated. It will be improved and included in the new M-231 connection to I-96.
- f. M-104 will be widened to a five-lane road rather than a boulevard. There will not be any U-turn movements needed.
- g. See previous reply.
- h. See previous reply.
- i. This ramp is not a part of the Preferred Alternative. See reply 2a.
- j. The park & ride lot will remain in its existing location.
- k. As part of the Preferred Alternative, the eastbound I-96 left off ramp will be eliminated and replaced with two new right off ramps – one to the new M-231, and one to 112<sup>th</sup> Avenue, which is currently a partial interchange. The westbound Cleveland Road to westbound I-96 ramp will also be eliminated and replaced with two new ramps – one from the new M-231, and one from 112<sup>th</sup> Avenue.

## **FRUITLAND TOWNSHIP RESOLUTION 99-1**

**WHEREAS**, the Michigan Department of Transportation has recently completed a draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa, and Muskegon Counties to determine the preferred alternative(s) for addressing traffic congestion on US-31; and

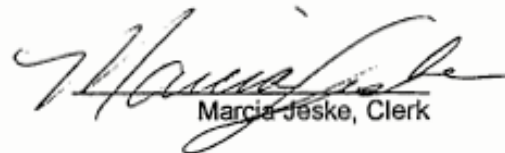
**WHEREAS**, US-31 is a vital transportation corridor for Muskegon County; serves a significant number of commercial and industrial enterprises in the County; and will continue to be an important north-south corridor in the economic development of the West Michigan Region; and

**WHEREAS**, the position of the Muskegon County US-31 Blue Ribbon Committee is summarized in the enclosed position paper, which was unanimously adopted by the committee on November 16, 1998.

### **NOW, THEREFORE, BE IT RESOLVED**

That the Township of Fruitland hereby endorses the position of the Muskegon County US-31 Blue Ribbon Committee, and requests the Michigan Department of Transportation enter the resolution into the record of public comments.

Moved by Jeske, supported by Broner, and thereafter acted upon by the Fruitland Township Board at a Regular Meeting held on January 12, 1999.  
5 yeas, 0 nays, 0 absent

  
Marcia Jeske, Clerk

**Fruitland Township, January 12, 1999, Resolution**

Acknowledge receipt of resolution supporting the position of the Muskegon County Blue Ribbon Committee, which supports Alternative A and opposes bypass alternatives. This alternative was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**. In addition, please refer to responses provided for the West Michigan Shoreline Regional Development Commission.

**Fruitport Charter Township**

6543 Airline Road  
Fruitport, Michigan 49415

Office of the Supervisor  
Ron Cooper

Telephone (616) 865-3151  
Fax (616) 865-3118

January 25, 1999

Mr. Jose A Lopez, Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Re: Regarding US31 improvements

Dear Mr. Lopez:

Bringing US31 into our township via 120th Ave. will not only create problems for the residents along that road in Ottawa County, but will create problems for us also.

We are trying to contain urban spread along the present US31. By changing US31's course it will make it difficult for the developers along the current US31 to realize the necessary return on their investment. It will encourage development along its route on I96 in areas that contradict the desires of the people living in that area and the township in general.

It will necessitate an interchange at Sternberg and raise more havoc and our quality of life for the residents in that area as those people find businesses being built next to them and around the interchange. If you keep US31 where it is, only a off and on from the east will be needed on Sternberg Road.

The exit ramp of I96 merging onto US31 north already is becoming a problem and won't be able to handle the added flow from a rerouted US31.

I believe you should keep US31 through Grand Haven on its current road bed. I believe you should take a good look at making it an elevated road bed as it comes in to Grand Haven for through traffic and put in ramps for local traffic. When the road gets close to the current bridge on the Grand River then run the elevated road just to the west. The old bridge can continue to be used for local traffic. When the current US31 was built it was planned to go around Grand Haven. The Grand Haven residents argued to have it go through Grand Haven. They have their

road where they wanted it. Now it needs to have added capacity and they need to accept it as the consequence of their previous desires.

As the Fruitport Township Supervisor I strongly recommend keeping US31 on its present right-a-way.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Cooper". The signature is stylized with a large, looped "R" and a cursive "Cooper".

Ron Cooper  
Fruitport Charter Township, Supervisor

**Fruitport Charter Township, January 25, 1999**

2. Acknowledged receipt of comments and concerns, and support for improving US-31 (Alternative A) over creating a bypass. This alternative was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**.
3. Refer to **Section 4.1** for a discussion of the land use impacts.

B 3



February 2, 2001

Greiner Engineering, Inc.  
Mr. Mike Yeager, Project Planner  
3950 Sparks Drive, S.E.  
Grand Rapids, Michigan 49546

Re: US-31 Study; Beacon Boulevard and Six Lanes

Dear Mike:

Because of certain proposals that have been discussed to eliminate or postpone the need for widening Beacon Boulevard and US-31 within the township (*e.g., constructing a bridge at the Comstock Street location or using 168<sup>th</sup> Avenue as a major traffic route*), the township finds it necessary to become more involved in the US-31 Study process.

To make sure there are no misunderstandings, the township remains opposed to the construction of a bridge at Comstock Street as any part of the solution to the traffic issues associated with US-31. As you are aware, over 400 letters were forwarded to the US-31 Study Process in opposition to the use of Comstock Street as part of the solution. Moreover, a new subdivision has since been platted along the necessary route of any Comstock Street bridge proposal.

In addition, although the problems associated with the idea to use 168<sup>th</sup> Avenue as a north route to delay or eliminate the need of six lanes along US-31 and Beacon Boulevard seem obvious and numerous, I believe it is necessary to state opposition to this proposal. Specifically, the following problems and issues exist with this newly proposed north route:

- ✓ 168<sup>th</sup> Avenue is inappropriate for a north route since the city's Master Airpark Plan calls for 168<sup>th</sup> Avenue to be closed between Hayes Street and Comstock Street when the east/west runway is expanded.
- ✓ The proposal would bring a major thoroughfare into existing residential neighborhoods.
- ✓ The proposal would require major realignments within the city to avoid 90 degree turns when the route moved from 168<sup>th</sup>/Beechtree to Fulton Street and from Fulton Street to Beacon Boulevard.
- ✓ This proposal might also have a major impact on the current land use resulting in pressures to amend the township's and city's Master Plan.

Other problems might also exist which I have not yet considered.

Page -1-

As a result of the aforementioned proposals, the Grand Haven Charter Township Board may determine it is appropriate to adopt a resolution supporting MDOT's proposal to widen US-31 and Beacon Boulevard. However, before this type of resolution can be considered, I would request the following information:

- ✓ The new traffic counts and projections that are being completed by your firm.
- ✓ The projected LOS at the following intersection both with and without the six-lane widening of Beacon Boulevard and US-31:
  - Ferris Street
  - Hayes Street
  - Comstock Street
  - Robbins Road
  - Taylor Avenue
  - Grant Street
  - Washington Street
  - Fulton Street, and
  - Jackson Street
- ✓ A brief statement on the required takings within the City of Grand Haven with a emphasis on whether any of these takings are the result of self-induced hardships resulting from Zoning Ordinance language rather than practical difficulties for the property or business owner.
- ✓ A brief statement on whether you believe that Ottawa County should create a regional traffic model for the county to assist in finding local solutions to some of these traffic issues not directly related to US-31.

I suspect that the Township Board may request a presentation from you after we have received and reviewed the aforementioned information. If you have any questions or comments, please contact me at your convenience.

Warm Personal Regards,



**WILLIAM D. CARGO**

Township Superintendent/Manager

c: Correspondence File

**Grand Haven Charter Township, February 2, 2001**

1. The Preferred Alternative does not include a new route along 168<sup>th</sup> Avenue.

Mr. Mike Jaeger  
URS Greiner Woodward Clyde  
3950 Sparks Drive, SE  
Grand Rapids, Mi. 49546

December 12, 1998

Dear Mr. Jaeger:

The Holland Charter Township Planning Commission would like to go on the record in the interest of the location of US-31.

We feel that there are very compelling reasons for leaving it in its' current location, with some upgrades. Either a freeway as proposed in Alternate "A", or some other design that would limit the number of access points, would be acceptable to us.

We have just completed an upgrade of the Holland Charter Township Master Plan and feel that any change in location of US-31 would do more economic harm than good to the entire area. Some of the detrimental effects we see are:

1. Good agricultural land taken for roadway, plus the excess pieces of property that will not be needed for the roadway will become waste land as it is no longer accessible for farming.
2. The amount of traffic diverted by a bypass will not be sufficient enough to have any major impact on the existing US-31 traffic.
3. If we build anything else, we will have another roadway to perform maintenance on and the added expense in the years to come. We don't keep the current roads in adequate repair so this will cause even more problems.
4. Environmental impact - this approach will have very little to worry about as you will not encroach into any new areas.
5. Your economic impact statements and cost analysis do not and cannot consider all the loss of business losses and closing that may occur if we divert traffic to other areas.
6. New roads will give added interchanges in other areas of the county. This will create pressure on those areas to develop into commercial and industrial zones, once again taking away good farmland and adding cost to the local governments budgets.
7. US-31 will have to be upgraded no matter what proposal is eventually adopted. Why not choose this alternative and have savings of millions of dollars as well.

These are just a few of the reasons that the Holland Charter Township Planning Commission has instructed me to write to you, stating our opposition to any plan that would move US-31 from its' current route.

Sincerely,



Mr. Marion Hoeve, Chairman  
Holland Charter Township Planning Commission

**Holland Charter Township, December 12, 1998**

The Preferred Alternative only includes improvements along existing US-31 in Holland Township. It does not include any work on a new alignment in Holland Township.



CHARTER

## TOWNSHIP OF MUSKEGON

1990 APPLE AVENUE  
MUSKEGON, MICHIGAN 49442-4247

Resolution No. 99-

Phone: (616) 777-2555  
Fax: (616) 777-4912

### **RESOLUTION** **IN SUPPORT OF US-31 POSITION** **OF**

### **MUSKEGON COUNTY US-31 BLUE RIBBON COMMITTEE**

**WHEREAS**, the Michigan Department of Transportation has recently completed a Draft Environmental Impact Statement (DEIS) for US-31 in Allegan, Ottawa, and Muskegon Counties to determine the preferred alternative(s) for addressing traffic congestion on US-31;

**WHEREAS**, US-31 is a vital transportation corridor for Muskegon County; serves a significant number of commercial and industrial enterprises in the county, and will continue to be an important north-south corridor in the economic development of the West Michigan Region;

**WHEREAS**, community leaders in Muskegon County representing business, industry, tourism, government, financial institutions, and other interests have organized under the umbrella of a Muskegon County US-31 Blue Ribbon Committee to review the Environmental Impact Study and formulate a Muskegon County position regarding the alternatives under consideration;

**WHEREAS**, the position of the Muskegon County US-31 Blue Ribbon Committee is summarized in the enclosed position paper, which was unanimously adopted by the committee on November 16, 1998;

**NOW, THEREFORE, BE IT RESOLVED** that the Charter Township of Muskegon hereby endorses the position of the Muskegon County US-31 Blue Ribbon Committee, and requests the Michigan Department of Transportation enter this Resolution into the record of public comments.


**BE IT FURTHER RESOLVED** that a copy of this Resolution be delivered to the Bureau of Transportation Planning Michigan Department of Transportation.

A motion was made by Bartos, seconded by Patton  
to adopt the foregoing Resolution.


**AYES:** Aley, Bartos, Patton, Chaney, Ream, Rusch, and Timmer.

**NAYS:** None.

**RESOLUTION DECLARED ADOPTED.**

  
Darryl Bartos  
Muskegon Charter Township Clerk  
Date January 19, 1999

I hereby certify that the foregoing constitutes a true and complete copy of a Resolution adopted by the Township Board of the Charter Township of Muskegon, County of Muskegon, State of Michigan, at a regular meeting held on January 18, 1999, and that public notice of said meeting was given pursuant to Act No. 261, Public Acts of Michigan, 1968.

  
Darryl Bartos  
Muskegon Charter Township Clerk  
Date January 18, 1999

dc-us31resolution.wpd  
01/14/99

**MUSKEGON AREA RESPONSE  
TO THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
FOR US-31 IN ALLEGAN, OTTAWA,  
AND MUSKEGON COUNTIES**

Prepared for  
**Muskegon Area Community Leaders meeting as the  
Muskegon County US-31 Blue Ribbon Committee**

by the  
**West Michigan Shoreline Regional Development Commission**

December 1998

**Muskegon Township, January 18, 1999**

Acknowledged receipt of resolution of support for the Muskegon County US-31 Blue Ribbon Committee's recommendation, Alternative A, and opposition to bypass alternatives. The Committee's recommendation is presented in a report titled "Muskegon Area Response to the Draft Environmental Impact Statement for US-31". Alternative A was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**. The current PA is included in the approved Muskegon Metropolitan Planning Organization's 2035 Long Range Transportation Plan.

# TOWNSHIP OF OLIVE

TOWN 6 NORTH - RANGE 13 WEST

OTTAWA COUNTY, MICHIGAN

January 26, 1995

Griener, Inc.  
1950 Sparks Dr., SE  
Grand Rapids, MI 49546

Dear Griener Associates,

Like everyone in the US 31 By-Pass proposed route, we, the Olive Township Board of Trustees have a concern and wish to voice our opinion in regards to the US 31 By-Pass impacting Olive Township.

At our last meeting we reviewed the drawings, studied the layout of the land and considered comments from our residents. In conclusion we would like to recommend this proposal to you:

"We recommend that the US 31 By-Pass start angling off just north of Stanton Street, and tie up with the proposed alternative F route and follow through with it over the Grand River with a much needed bridge at that point."  
(A map is enclosed and is marked out).

This alternative route would eliminate eight issues of concern for you, as well as, for our township.

It will:

- 1) Eliminate the impact of crossing the Pigeon River and disrupting a one mile stretch of wetlands along 116th Avenue.
- 2) Eliminate the cost of going through the wetlands and possibly replacing them, and the cost of building and maintaining another bridge over the Pigeon River.
- 3) Eliminate the impact on 35 households and the cost of purchasing these homes, as well as, the land involved along the route.
- 4) Eliminate the impact of disrupting farms that are presently being farmed.
- 5) Eliminate the impact of having two highways running parallel to each other and having a four mile length of land disrupted between the two.
- 6) Eliminate the fact that a highway will split our township, allowing for only 3 open roads to cross from one side of the township to the other for Emergency and Fire Protection.
- 7) Eliminate the cost of maintaining two highways. By using the existing road bed for an additional four miles a great savings is seen.
- 8) Eliminate the fact that our Master Plan for Industry along the existing US 31 will not be disrupted and water and sewer for additional industry will be put on hold.

Lastly, we would like to add that we are a small rural community with four churches and two private schools at each end of the township. We are proud of our heritage and are very family oriented. We would like to see our township remain as a whole, with unity and opportunity for everyone. With the plan as you have proposed going right through our township, it would split that community right in half.

Thank you for listening and if you have any comments or questions please feel free to give us a call.

We are looking forward to meeting with you and discussing these proposals.

Sincerely,

The Olive Township Board  
Beverly Jaarsma, Clerk  
875-8900 or 875-8491

**Olive Township, January 26, 1995**

Acknowledged receipt of letter suggesting a modified Alternative F1/F3. Alternative F1/F3 was not selected as the Preferred Alternative for reasons documented in **Chapter 3**. Subsequent letters from the Joint Township Committee against a Rural Bypass have also been addressed in this chapter. As the Preferred Alternative does not include the segment J1 that traverses Olive Township, there are no wetland, agricultural or residential land impacts in the township. As per the response to the Joint Township Committee against a Rural Bypass letters, Olive Township has since changed its position and currently supports the preferred alternative.



# Olive Township

6480 - 136th Ave.  
Holland, MI 49424

Phone (616) 786-9996  
FAX (616) 786-3133

October 20, 2000

Department of Transportation  
Jeffrey R. Saxby  
425 West Ottawa  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Saxby,

The Olive Township Board of Trustees met in Regular Session Thursday, October 19<sup>th</sup> at 7:00 p.m.

At that meeting your letter dated September 27, 2000, requesting a response to the question of Tim Dykstra's ability to duly represent both his Supervisor position and the Executive Director for the Coalition for Sensible Transportation was presented and read. A time for discussion between Board members, as well as, some input from residents in attendance took place.

Following the discussion it was decided by the Board that Tim Dykstra, as Olive Township Supervisor and Executive Director for the Coalition for Sensible Transportation could in fact represent both positions, due to the fact that the Mission Statement of the Coalition is as follows:

"The Coalition for Sensible Transportation Solutions is an alliance of local governments working together with farm, environmental, business, and civic organizations to protect agricultural land, open space, fishery and wildlife habitat, and the environment. The Coalition will achieve its goals by developing a credible, reasoned, and consensus-based alternative to the proposed US-31 bypass in Ottawa County, and by establishing a highly visible and influential public education and communications program to build public support for that alternative."

The Coalition is not saying:

"No by-pass", they are saying "a Sensible Solution".

Thank you for your concern in this matter, and I hope that this letter will clear up any misgivings you may have had.

Also, a letter will be forthcoming listing our recent requests that were discussed at the October 16<sup>th</sup> meeting and a few new issues we have thought of since then.

Sincerely,

  
Beverly Jaarsma, Clerk

**Olive Township, October 20, 2000**

Letter acknowledged. No comment needed.



# Olive Township

6480 - 136th Ave.  
Holland, MI 49424

Phone (616) 786-9996

FAX (616) 786-3133

E-Mail: [Olivetownship@wmol.com](mailto:Olivetownship@wmol.com)

October 27, 2000

Mr. Jeffery R. Saxby  
Michigan Dept. of Transportation  
Transportation Building  
425 West Ottawa P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Saxby,

Thank you for your visit on October 16, 2000 to review the recent changes to the US-31 F/J1 proposal. We also appreciate the engineers from URS Greiner attending so that they could hear our concerns first hand.

As a re-cap, we would like to reiterate the issues discussed at that meeting.

1. We appreciate the tightening of interchanges at Port Sheldon and 96<sup>th</sup> Ave.
2. The interchange at the north/south and east/west, at approximately 120<sup>th</sup> Ave and Van Buren, remains excessive. Suggest tightening the interchange a bit and moved east so that 120<sup>th</sup> Ave is not impacted. 120<sup>th</sup> Ave. must remain a straight road. This could also help in saving some of the land on the farms impacted by this interchange.
3. We would like an explanation on why the north/south portion was moved west from its prior location, particularly south of Polk Street.
4. There is a development in process along 116<sup>th</sup> Ave. between Tayler and Polk on the parcel with the pond. This development will have a 20-acre lake and a number of homes.
5. The Pigeon River is being bridged. We would like additional studies on impacts if the bridge were higher to provide an overpass at Stanton Street.
6. A number of P.A. 116 properties are being effected either directly or as wetland reconstruction. Please advise us as to which P.A. 116 properties are affected and where all wetlands will be mitigated.
7. How will capital gains taxes effect those who owned properties for a number of generations? Will this tax liability be avoided or covered by the State? This was not answered from our last correspondence.
8. We've heard that there could be an interchange built at Fillmore Street. We must know if this will be the case.
9. The historic Ottawa Station area is being impacted at Stanton Street. This must be included in the EIS. A question of impact was asked in our letter dated January 5, 2000. We are still waiting for a response.
10. In discussion about development pressures, especially from the south, we asked that the east/west portion be moved to within ¼ mile of New Holland Street. URS Greiner engineers, at that meeting, agreed this would be an effective way to control development pressure. We realize the interchange at the current US-31 will be a challenge, but believe that, with all the expertise at URS Greiner and M-DOT, this can be overcome. This revision is necessary.

Please respond to these issues soon. We are currently in the process of updating our Master Plan. These issues will cause a major impact on our planning process and the ordinances necessary to be effective as a township.

In closing, we wish to reiterate our continued displeasure and opposition to the F/J1 proposal. It is important, however, to continue to work with M-DOT so as to limit the negative impacts our community will experience in the unlikely event it is built.

If you have any questions, please feel free to contact me at any time. I will be happy to discuss these issues further with you.

Sincerely,

Timothy J. Dykstra, Supervisor

**Olive Township, October 27, 2000**

1. The current PA does not include any work in Olive Township.

January 7, 1999

To: Jose A. Lopez  
Public Hearings Officer  
M.D.O.T. Bureau of Transportation Planning  
P.O. Box 30050  
Lansing, Mi. 48709

From: The Robinson Township Planning Commission

Subject: Position Statement Regarding the Proposed Improvement/Relocation of US-31.

After careful evaluation of the Draft Environmental Impact Statement, M.D.O.T. literature, Greiner Engineering publications, and other considerations, the Robinson Township Planning Commission endorses those Alternatives which utilize the existing US-31 location and opposes all alternatives that involve the creation of a rural bypass or the improvement of 120<sup>th</sup> Ave. The following are offered in support of this position.

1. Traffic study data indicates that more than 80% of the subject traffic is local traffic between Holland and Muskegon. A rural bypass represents an indirect route and will not significantly reduce the traffic volume and congestion on the existing US-31. Only increasing the capacity of the existing US-31 in it's present location will help.
2. It is recognized that Grand Haven has a traffic problem and that the problem has been amplified through Grand Haven's commercial development along Beacon Boulevard, promotion of industrial development, and by extensively promoting tourism. The existing US-31 route through Grand Haven needs to be improved to reduce the congestion caused by Beacon Boulevard and the bridge over the Grand River.
3. If any option, other than the "No Action Alternative" is selected, land will be lost in Grand Haven to improving Beacon Boulevard anyway.
4. The Robinson Township Planning Commission has been actively trying to preserve farmland and open spaces. All rural bypass options will be in direct opposition to the Robinson Township Master Land Use Plan, The Robinson Township Zoning Ordinance, and the Ottawa County Development Plan. Ottawa County is the number one county in the State in agricultural production. Robinson Township and Ottawa County residents are and all Michigan residents should be proud of and preserve this distinction instead of considering traffic alternatives that would negatively impact upon this resource.

5. The United States Department of Agriculture supports Alternative A and opposes any alternatives utilizing a rural bypass.
6. According to the Draft Environmental Impact Statement, all Alternatives except "No Action" will involve approximately the same amount of land conversion in Grand Haven for road improvement. Any rural bypass however, will negatively impact wetlands, wildlife, and the preservation of farmland and rural land.
7. The Robinson Township Planning Commission conducted a Land Use Survey of all property owners in Robinson Township. In response to a direct question, the majority of responses were in opposition to a rural bypass.
8. The most cost effective Alternatives involve the improving the existing US-31 in it's present location. M.D.O.T., as stewards of taxpayer dollars, should select cost effective alternatives.
9. A rural bypass would divide Robinson and other rural townships, destroying communities and adding life-threatening time to emergency responses. The majority of responses by the Robinson Township Fire/Rescue Department are West from the Fire Station located at 120<sup>th</sup> Ave. The limited crossings resulting from a limited access freeway would greatly increase the emergency response time. This problem is compounded by the fact that the majority of Township fire/emergency personnel would reside on the opposite side of the bypass from the fire station at which all equipment is located.

For these reasons, the Robinson Township Planning Commission opposes any rural bypass Alternatives and improvements to the 120<sup>th</sup> Ave. corridor.

Robinson Township Planning Commission

  
Gloria Burkhardt, Chair

CC: See attached list.

cc: Governor John Engler; Jeff Saxby, Project Engineer, MDOT; Jim Kirschensteiner, Federal Highway Administration; Ed Hanenburg, Chairman, Ottawa County Planning Commission; Mark Knudsen, Ottawa County Planner; R. Christopher Byrnes, Ottawa County Planning Commission; Betty Gajewski, Ottawa County Planning Commission; Robert Sewick, Ottawa County Planning Commission; Roger Rycenga, Ottawa County Commission / Land Use Committee; Gordon Schrottenboer, Ottawa County Commission / Land Use Committee; Robert J. Rinck, Ottawa County Commission / Land Use Committee; Joseph Haveman, Ottawa County Commission / Land Use Committee; Leon Langeland, Ottawa County Commission / Land Use Committee; Dennis W. Swartout, Ottawa County Commission; Luciano Hernandez IV, Ottawa County Commission; Harris Schipper, Ottawa County Commission; Frederick Vander Laan, Ottawa County Commission; Cornelius Vander Kam, Ottawa County Commission; D. Dale Mohr, Ottawa County Commission; Robert W. Karsten, Ottawa County Commission; Mr. Lou Lambert, Bureau of Transportation Planning, MDOT; Sue Higgins, Macatawa Area Coordinating Council; Steve Bulthuis, Macatawa Area Coordinating Council; Rep. Jon Jellema; Rep. Peter Hoekstra; Rep. Ken Sikkema; Sen. William Van Regenmorter; Sen. Leon Stille; Michael Jaeger, URS Greiner; Gord Ellens; Tim Dykstra; Ray Masko; Michael Fortenbacher; Cliff Murray; Conni Schaftenaar; Nancy Zennie; Thom Peterson; Jack Fisher; Tom Mellema.

**Robinson Township Planning Commission, January 7, 1999, “Position Statement”**

Acknowledged receipt of the Township’s “Position Statement” opposing a rural bypass. **Chapter 3** includes the reasons for selecting the current PA, which addresses the purpose of and need for the project. Improvements made to existing US-31 will be done to the median side of the roadway within existing right-of-way, with the exception of US-31 north of Jackson Street. Increasing capacity on the existing US-31 Boulevard does not address the long-term needs in the study area.

1. The Preferred Alternative includes upgrades to existing US-31 in order to improve capacity. Additional access across the Grand River in Ottawa County is needed for the areas that have grown and continue to grow east of existing US-31. **Chapter 3** discusses the Preferred Alternative in detail and a detailed design is included in **Appendix A**.
2. Modifications to existing US-31 are included in the Preferred Alternative to address remaining congestion in the City of Grand Haven.
3. Improvements made to existing US-31 in Grand Haven will be done to the median side of the roadway within existing right-of-way, with the exception of US-31 at the intersection of Jackson Street. Three parcels will have partial impacts. The “No-Action Alternative” will not address any of the long-term transportation needs of the study area.
4. MDOT commissioned MSU to perform a land use study to address these concerns. The US-31 Land Use Study is discussed in **Section 2.2**. The US-31 Land Use Study conducted by MSU concluded that the conversion of land from open/agricultural to built areas has in the past and will continue to occur in Ottawa County due to the economic climate of the area and access to Grand Rapids. The proposed road location has little effect on the location of potential new built areas. Impacts to farmland will be approximately 115.8 acres.
5. Comment acknowledged. Please see response to United States Department of Agriculture.
6. A discussion of environmental resources and mitigation is contained in **Chapter 4**. All of the build alternatives have some environmental consequences. Unfortunately, the “No-Action Alternative” will not address any of the long-term transportation needs of the study area.
7. Comment acknowledged.
8. The construction of Alternative A was estimated to be the highest priced alternative of all of the Practical Alternatives.
9. The new route (M-231) will be a two-lane limited access facility rather than a full freeway. **Chapter 3.5** discusses the Preferred Alternative.

## ROBINSON TOWNSHIP

Ottawa County

110 - 120th Avenue

Grand Haven, Michigan 49417

(616) 846-2210

FAX: (616) 846-2369

January 21, 1999

To: Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Mi. 48909

From: The Robinson Township Planning Commission

Subject: Response to the Ottawa County Planning Commission Position Paper on US-31

The Ottawa County Planning Commission has opposed urban sprawl and has for many years advocated preservation of irreplaceable farmland. Their endorsement of a Position Statement that is contrary to some of their fundamental beliefs is a shock to the entire rural community. Although we were surprised by this County Planning Commission action, we are not so naïve as to expect everyone to agree with us. However, this Position statement prepared by Mr. Knudsen and his staff is so slanted toward Alternative F/J1 that the inconsistencies and contradictions of the D.E.I.S in it are unacceptable to us and we trust they will be equally unacceptable to M.D.O.T. and Greiner Engineering.

For the sake of brevity, we will not point out every exaggeration and false statement in the County Position Paper; we will however touch on some of the more glaring ones.

1. The County Position Paper neglects to mention that every alternative but the "No Action" alternative requires changes and improvements to the existing U.S.-31 roadway. | 1
2. All through their Position Statement, Mr. Knudsen and his staff project thirty to fifty years into the future. No one, including M.D.O.T. and Greiner Engineering, will even attempt to project beyond twenty years. | 2
3. In 1992, The Ottawa County Development Plan was adopted and discouraged major road improvements in rural areas. Since the U.S.-31 Staff Position Paper prepared by Mr. Knudsen and his staff is a direct contradiction of the County Development Plan, they rationalize their action by saying the 1992 Plan was conducted 7 years ago based upon the best information that was available at the time and as such is obsolete. Yet their projections up to 50 years in the future in their Position Statement they maintain are accurate. | 3
4. The adoption of Alternative F/J1 would place two major divided highways several miles apart from each other. Has the standard maintenance plus periodic resurfacing costs of this situation been addressed? | 4
5. For complete details regarding discrepancies in the County Position Paper, please refer to the January 18, 1999 submission by the Homestead Trout Farm and Hatchery. | 5

**WE FEEL VERY STRONGLY THAT THE MOST LOGICAL AND COST EFFECTIVE OPTION IS "ALTERNATIVE A", COUPLED WITH A TWO LANE BRIDGE OVER THE GRAND RIVER AT 104<sup>TH</sup> AVE.**

*William Maschewski*  
Wm. Maschewski, Secretary/Treasurer

and  
*Bernice Berens*  
Bernice Berens, Commissioner

Robinson Township Planning Commission

CC: USR Greiner Woodward Clyde  
3950 Sparks Drive SE  
Grand Rapids, Mi. 49546

## ROBINSON TOWNSHIP

Ottawa County

2010 - 120th Avenue

Grand Haven, Michigan 49417

(616) 846-2210

FAX: (616) 846-2369

POSITION STATEMENT OF THE ROBINSON TOWNSHIP BOARD OF TRUSTEES regarding the proposed improvements and/or relocation of US-31 from I-196 north to I-96.

All comments, data and evaluations are drawn from the D.E.I.S. and literature and newsletters published by Greiner Engineering and M.D.O.T.

1. Grand Haven has a traffic problem on US-31 that will remain and continue to worsen unless some action is taken.
2. A regional by-pass will not significantly reduce the congestion on the existing US-31. Only increasing the capacity of US-31 will reduce this congestion.
3. Regardless of which alternative is selected, Beacon Boulevard is slated to be improved and expanded to eight lanes.
4. No matter which alternative is selected, except the No Action Alternative, the same amount of land through Grand Haven would be used.
5. The single most important issue facing the Ottawa County Planning Commission and also all Township Planning Commissions in the county is the preservation of irreplaceable farmland.
6. The facts presented in the D.E.I.S. clearly address the negative impact a regional by-pass will have on wetlands, wildlife, prime farmland and the preservation of rural land, and it further states in the D.E.I.S. that the same amount of land through Grand Haven will be used regardless of which alternative is selected.
7. Therefore, the Board opposes establishment of any regional by-pass because of the unavoidable negative effect of such a by-pass.


PAGE 2

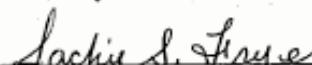
Based upon the above stated facts, the Board of Trustees of Robinson Township endorse Alternative A.

It is not only the most environmentally safe alternative, but overall the most cost effective.

Respectfully,

Robinson Township Board of Trustees

  
RAYMOND MASKO, SUPERVISOR

  
JACKIE FRYE, CLERK

  
DONNA STILLE, TREASURER

  
EARL RALYA, TRUSTEE

  
JOHN KUYERS, TRUSTEE

## ROBINSON TOWNSHIP

Ottawa County

12010 - 120th Avenue

Grand Haven, Michigan 49417

(616) 846-2210

FAX: (616) 846-2369

January 22, 1999

Mr. Jose Lopez  
MDOT  
State Transportation Building  
P.O. Box 30050  
425 W. Ottawa Street  
Lansing, MI 48909

Dear Mr. Lopez:

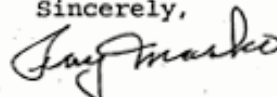
The loss of irreplaceable farmland is a primary concern to us all. Once it is gone, it is gone forever.

Please find enclosed a document showing the financial loss to only one nursery man on only two farms. Add to this all of the farmland that will be impacted by Alternative F/J1 and the figures will be staggering.

We assert, as we have in our previous comments that Alternative F/J1 will negatively impact our fragile environment, cause harm and loss to agriculture that is unrecoverable, and will not accomplish the goal of significantly reducing traffic on existing US-31.

The only logical and cost effective alternative is "A". We must protect our farmland and our environment.

Sincerely,



Ray Masko

RM/mlr

Enclosure

**Robinson Township, January 21, 1999**

Acknowledged receipt of the Township's opposition to the bypass alternatives and support for alignment alternatives such as Alternative A. This alternative was not selected as the Preferred Alternative for the reasons documented in **Chapter 3**.

All reasonable measures were taken to reduce impacts to farmland. Refer to **Section 4.2** for additional details on this subject.

1. Existing system improvements alone do not address the long-term needs of the US-31 Study Area.
2. Comment acknowledged.
3. Comment acknowledged.
4. The Preferred Alternative includes a two-lane roadway on a new alignment. Maintenance has been considered in the selection of the Preferred Alternative.
5. Comment acknowledged. Discussions with Robinson Township subsequent to the publication of the DEIS resulting in its support of the current PA.

Please refer to the response to those issues raised in the Robinson Township Position Statement dated 1/21/99.

B3

## ROBINSON TOWNSHIP

Ottawa County

12010 - 120th Avenue

Grand Haven, Michigan 49417

(616) 846-2210  
FAX: (616) 846-2369

October 24, 2000

Mr. Mike Jaeger, Project Engineer  
URS Greiner, Inc.  
3950 Sparks Drive SE  
Grand Rapids, MI 49546

Dear Mr. Jaeger:

Thank you, your engineering staff, and the MDOT personnel for taking time out of your busy schedules to come and discuss with us the changes to the proposed FJ-1, 120th Avenue Bypass alignment.

Your efforts to protect farmland such as the nursery at M-45 and the trout farm at North Cedar Drive are appreciated, however, in so doing you have impacted other farmland and endangered even more wetlands by shifting the alignment to the west.

Providing Robinson Township with four overpasses, those being at Fillmore, Pierce, Buchanan and North Cedar may on the surface appear to be adequate, but in order to accommodate emergency vehicles, fire trucks, school buses and agricultural traffic, we must insist that all east/west streets be provided with overpasses.

When we asked about pollution of wetlands caused by runoff from the bridges, we were told that the runoff would be channeled to either end of the bridge into holding tanks and/or retention ponds. We ask for a clearer definition of how the runoff will be handled and where it will eventually settle.

We are enclosing an article that contradicts some of what we were told and addresses our concerns.

Our final request is for a map of the entire proposed FJ-1, 120th Avenue Alternative because if this freeway becomes a reality, we will not be affected by only the segment through Robinson Township, but by the entire length, from I-196 to M-104.

In closing, we reiterate that Robinson Township remains opposed to this bypass not only because of the loss of valuable farmland and the threat to and destruction of irreplaceable wetlands, but

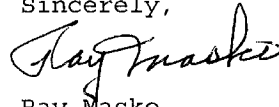
2

because of the waste of over 500,000,000 taxpayer dollars on a freeway that is projected to accommodate less than 18,000 vehicles a day when we are convinced that a two lane bridge along with existing two lane roadways will accomplish the same.

4

An example would be the amount of traffic on M-104 between I-96 and Spring Lake. In 1995, this count was 18,000 vehicles per day and has increased significantly since. Although this is an exaggerated example and we realize that M-104 traffic is at times too heavy, it does show how much traffic a two lane road can handle.

Sincerely,



Ray Masko

RM/mlr

**Robinson Township, October 24, 2000**

1. Impacts to farmland have been minimized by locating the Preferred Alternative along property lines. The wetland impacts were similar at both locations, and have been minimized.
2. All existing cross streets in Robinson Township will be maintained with either overpasses or intersections, except Johnson Street, which will be cul-de-saced.
3. Runoff from the bridge will be directed to detention basins, where sediment and other pollutants will settle prior to being discharged to the river.
4. The Preferred Alternative is a two-lane road and bridge on a new alignment extending from M-45 to M-104/I-96.



spring  
lake  
township

"WHERE NATURE SMILES FOR SEVEN MILES"

106 South Buchanan, Spring Lake, Michigan 49456

Phone: (616) 842-1340

Fax: (616) 842-1546

January 5, 1999

Joseph A Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI

Dear Mr. Lopez:

For your information, I am enclosing a copy of our Township Board Minutes from December 13, 1993 where our Township Board went on record as opposing any Bypass Corridor for US 31 in the area of 144<sup>th</sup> Ave and 148<sup>th</sup> Ave (Denoted as Corridor B in 1993). This corridor is now denoted as P/ P1r.

I am also enclosing a copy of a letter which I sent to our State Representative John Jellema on July 6, 1995, indicating why I believe what is now designated as the F/J1 Corridor would be the best alignment to utilize. The rationale in that letter remains as convincing now as it did in 1995 when the letter was originally written.

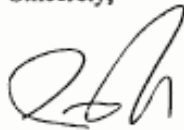
The P/P1r alignment can still only be recognized as a band aid approach to resolving the US31 traffic problem. After reviewing the Draft Environmental Impact Statement it becomes obvious that any alignment on the P/ P1r Corridor is the least cost effective (see pages 5-105 to 5-108 of Draft Environmental Impact Statement).

It should be further pointed out that the P/P1r B2a, B3 Corridor Proposal passes between Jeffers Elementary School and the currently under construction 24 million dollar Spring Lake High School. To locate a highway between these two facilities would be dangerous and beyond reason. The cost of purchasing right of way from the school district would also be prohibitive. Also please note on page 10-8 of the Draft Environmental Impact Statement the impact that P/P1r would have on the Grand Haven State Game Area.

It is not my intention here to point out those factors which have been so exhaustively detailed in the Draft Environmental Impact Statement, suffice it to say the Draft Environmental Impact Statement itself shows that any of the freeway alternatives better handle the long term traffic problem in a cost effective way than the band aid approach of a P/Plr "local by-pass". Engineering traffic and cost analysis all indicate that the P/Plr local by-pass in the area of Comstock and 144<sup>th</sup> - 148<sup>th</sup> Avenues are the least viable.

For your use I am also enclosing a copy of a Joint Resolution dated February 10, 1997 concerning our community consensus on the preferred alignment of US 31.

Sincerely,



James A. Jeske II  
Spring Lake Township Supervisor

**Spring Lake Township, January 5, 1999**

Acknowledge receipt of letter opposing a local Grand Haven bypass in the 144th and 148th Avenue area of the Township. No response required. The option was not selected as the PA.



spring  
lake  
township

"WHERE NATURE SMILES FOR SEVEN MILES"

106 South Buchanan, Spring Lake, Michigan 49456

Phone: (616) 842-1340

Fax: (616) 842-1546

January 25, 1999

Mr. Jose A. Lopez, Public Hearings Office  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

I am enclosing a letter which was sent to you on January 22, 1999 which was signed by the Mayor of Grand Haven. The letter refers to the enclosed letter of May 18, 1998 which was sent to Jeff Saxby. This letter is to advise you that the letter of January 22, 1999, was sent without the knowledge or the consent of Spring Lake Township.

The May 18 letter was sent before the DEIS was even released. I sent you a letter on January 5, 1999, which included Resolutions setting forth Spring Lake Township's official position. Thank you.

Sincerely,

James A. Jeske II  
Spring Lake Township Supervisor

**Spring Lake Township, January 25, 1999**

Acknowledge receipt of letter that Township was included on a letter dated January 22, 1999, by the City of Grand Haven without the township's consent. No response required.

Zeeland  
Charter  
Township

6582 Byron Road  
Zeeland, Michigan 49464

Phone (616) 772-6701  
FAX (616) 772-1857

December 8, 1998

Mr. Jose A. Lopez, Acting Public Hearing Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Re: US-31 Study & Route Selection

Dear Mr. Lopez:

At last we have seen the DEIS on the proposed US-31 location. I think that all of us who have read and studied it would say that it does represent an in depth analysis, is professional and is a remarkable objective piece of work.

It is obvious, that from all aspects of the study (environmental impact regarding farm land loss and wetland mitigation, return on investment, cost of construction, producing the hoped for result of improving traffic flow and safety) point to the selection of a freeway on the existing route. If the remaining parts of this long process of route selection truly have integrity it is our opinion that this will be the decision of the MDOT.

Thank you for taking the time to study this issue as completely as you have and thank you for listening.

For the Zeeland Charter Township Board.

Sincerely,



Gordon J. Ellens, Supervisor

vz

cc: Township Board

**Zeeland Charter Township, December 8, 1998**

Acknowledged receipt of their December 8, 1998 letter of support for Alternative A. Alternative A was not selected for the reasons documented in **Chapter 3**.

In a letter dated January 25, 1999, the Macatawa Area Coordinating Council (MACC), including representatives from Zeeland Charter Township, voted unanimously to support Alternative F/J1. The January 25, 1999 letter can be found in this Chapter 3. The PA includes critical segments of F/J-1.

Zeeland  
Charter  
Township

6582 Byron Road  
Zeeland, Michigan 49464

February 12, 2001

Phone (616) 772-6701  
FAX (616) 772-1857

Mr. Jeff Saxby, Project Manager  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Re: US-31 Bypass Project

Dear Jeff:

Following the recent adjustment to the US-31 Bypass alignment in Blendon Township, a number of Zeeland Township residents have come into the township office with questions and ideas.

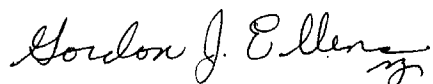
Our position on the bypass remains unchanged and we appreciate the work MDOT has done to accommodate our concern. We are now asking for two additional things.

1. With both Felch Street and Riley Street cut off a real problem is created for agricultural business. We would request a design which would allow Riley Street to remain open.

2. Could an overpass be built over I-196 at 72<sup>nd</sup> Avenue? The existing grades at this point would seem to lend themselves to this overpass.

I would direct your attention to the enclosed position statement adopted by the MACC. Again, we appreciate your co-operation and request that you review the issues identified in this letter.

Sincerely,



Gordon J. Ellens, Supervisor  
ZEELAND CHARTER TOWNSHIP

cc: Board Members  
Steve Bulthuis, MACC

10.

JHN 16/01 17:50 No.001 P.01

# Recommended Future Improvements to the US 31 Corridor

Post-It® Fax Note	7671	Date	2/11/00	# of pages	2
To	Gerd Ellert	From	Steve Bultman		
Co./Dept.	Zealand Twp	Co.	MACC		
Phone #		Phone #			
Fax #	772-9857	Fax #	395-2411		

*Macatawa Area Coordinating Council*

January 25, 1999

10:

JAN 16 '01 17:50 No.001 P.02

Ottawa County should institute a proactive program to provide assistance to individual units of government, as well as property owners and developers, to encourage growth that is consistent with these recommendations and which minimize impacts of the infrastructure on both urban and rural areas. Such a program might appropriately be referred to as "Sensible Growth" and should utilize lessons learned from other areas (e.g., Peninsula Township in the Traverse City area) while being developed to specifically meet the unique needs of this study area and the long-term growth philosophies of each affected unit of government.

### **Holland-Zeeland Bypass (F/J1)**

The preliminary engineering of a freeway bypass following the F/J1 alignment from I-196 to 120<sup>th</sup> Avenue is recommended. The specific alignment of this component of the recommendations should be identified as soon as possible, and development controls should be implemented, in order to preserve the corridor and protect it from future development that would impede the actual construction of the bypass. Construction is viewed as a possible future need to occur when funding becomes available. [Additional overpasses should be included in order to provide good connectivity of the local roadway network.] Interchange types and right-of-way widths should be examined to safely minimize impacts to agricultural areas and manage development.

Comments: Current and future development in the northern portion of the MACC and eastern Ottawa County, and the anticipated travel demand from that development, requires a long term transportation improvement. The bypass option would allow for a roadway that would facilitate goods and people movement, in primarily an east/west direction, between the Holland/Zeeland and Grand Rapids metropolitan areas, a traffic flow that continues to increase. At the same time, it would provide a safe and convenient route, along with the freeway option noted below, for through north/south traffic along a freeway system that is continuously connected from the Indiana state line to the areas north of the study area. [To preserve community cohesion, additional overpasses (e.g. Ransom Street) should be included.] Construction of this segment, along with the F/J1 freeway recommendation, closes the freeway gap in US-31. Conducting preliminary engineering to delineate the alignment of this improvement can greatly assist in preservation of the corridor and acquisition of right-of-way as it becomes available. Appropriate right-of-way should be set aside and protected, as soon as possible, in order to best implement this component of the recommendations.

**Zeeland Charter Township, February 12, 2001**

The Preferred Alternative does not include any work in Zeeland Township.

*Spring Lake*



*Public Schools*

345 Hammond Street  
Spring Lake, MI 49456-2096

Central Office: (616) 846-5500  
Superintendent: (616) 847-7919  
Fax: (616) 846-9830

November 18, 1998

Mr. Jose A. Lopez, Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

We are in receipt of your information package detailing the US 31 bypass options being considered for future construction. The Board of Education of the Spring Lake Public Schools unanimously opposes Options P1, and P1r, which cross the Grand River at Boom Road and then proceed north to Route 104.

Either segments B2a or B2b, if constructed, would be a disaster for the students of Spring Lake Public Schools. B2a goes north, contiguous to the site on which a new \$24 million high school is under construction and within 300 feet of the property on which Jeffers Elementary School is located.

Page 5-12 of your Draft Environmental Impact Statement Section 4(f) Evaluations states that "using segment B2a would require acquisition of the entire parcel including buildings" referring to the new high school. The reason the voters approved the construction of a new high school was the obvious overcrowding of the current facilities. To acquire our new building and site for over \$24 million would be a waste of money and would obviously extend our overcrowding for many years. With all of the other options being considered, it seems ridiculous for this to even be a possibility.

Segment B2b, while not adjacent to our two schools, would still have an adverse effect on the students attending them. It would be close enough to create safety concerns for elementary students and obvious noise and congestion problems in the vicinity.

While we applaud your efforts to find a viable solution to the US 31 traffic problems, we believe the adverse consequences of P1 and P1r make it imperative to choose one of the other options.

If you need any more information from the school district, or if either of these two options continues to be considered as a viable option, we ask that you contact us so that we might discuss the ramifications in more detail.

Sincerely,

SPRING LAKE PUBLIC SCHOOLS

*Larry F. Mason*

Larry F. Mason  
Superintendent of Schools

LFM:ac

**Spring Lake Public Schools, November 18, 1998**

Acknowledge receipt of their letter stating their opposition to the Local Grand Haven Bypass Alternatives using Comstock Street and its associated Grand River crossing. MDOT is no longer considering this alternative (P1 and P1r) as part of this project. The Preferred Alternative does not impact this school district. No response required.



**West Ottawa  
PUBLIC SCHOOLS**

294 W. Lakewood Blvd.  
Holland, MI 49424

Tel. (616) 395-2300  
FAX (616) 395-2391  
(616) 395-2392

**Administrative Cabinet**

Rosemary Ervine  
Superintendent

David Farabee  
Asst. Superintendent  
Human Resources

Larry Fegel  
Asst. Superintendent  
Teaching & Learning

Ray Johnson  
Asst. Superintendent  
Financial Services

Shirley Young  
Asst. Superintendent  
Pupil Services

tough-minded,  
underhearted place,  
focused on people,  
where quality is our habit  
and service to humankind  
is our common vision.

November 24, 1998

Mr. Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Lopez:

On behalf of the West Ottawa School District, I would like to comment on the alternative "R" proposal for improvements of US-31 from I-196 in Allegan County north to I-196 in Muskegon County. In alternate "R" you are proposing to use 120<sup>th</sup> Avenue as the main corridor for the by-pass.

The District has an elementary school, North Holland Elementary, located on 120<sup>th</sup> and New Holland Street. In 1990 we remodeled this building and in 1996 we added additional classrooms. This area has the fastest student growth rate of any of our schools. For the last few years, we have been receiving approximately 100 new students from the areas around Riley Street and 112<sup>th</sup> - 120<sup>th</sup>. In the next couple of years, we probably will have to build another addition to North Holland. This building will then house over 600 students.

If you were to build the by-pass along the 120<sup>th</sup> corridor, we would need to relocate the school. We are probably 75-100 feet from the roadway now; and if you were to expand the roadway, it would go through the center of the school. The state would have to buy the school, which would be costly. We have just completed a new school for a cost of \$9 million. I do not think the taxpayers of the West Ottawa School District would take kindly to paying additional money to have a pass-by along 120<sup>th</sup>.

I appreciate this opportunity to comment on the proposed by-pass. If you have any questions, please do not hesitate to call me at 616/395-2311.

Sincerely,

WEST OTTAWA PUBLIC SCHOOLS

Ray Johnson  
Assistant Superintendent for Finances

**West Ottawa Public Schools, November 24, 1998**

Acknowledged receipt of their letter expressing concerns for Alternative R and their North Holland Elementary School. Alternative R was not selected as the Preferred Alternative for the reasons documented in **Section 3.3.5**. The Preferred Alternative will not directly impact the North Holland Elementary School.

ZEELAND PUBLIC SCHOOLS  
TRANSPORTATION DEPT.  
720 EAST MAIN AVENUE  
POST OFFICE BOX 110  
ZEELAND, MI 49464-0110  
(616) 749-3425 • FAX 772-7359



December 10, 1998

Mr. Jose A. Lopez, Public Hrgs. Officer  
Bureau of Transportation Planning, MDOT  
P. O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Lopez:

There are many proposed options in the US-31 Location Design Study by the Michigan Department of Transportation. The recently released Draft Environmental Impact Statement (DEIS) shows nine options under consideration. Alternatives J1, F/J1 and F would significantly impact and alter the transportation infrastructure in the Zeeland Public School District. Alternative R would also require some adjustments to our bus runs but nothing as severe as the other proposals. The alternatives to the east and north of Zeeland are not acceptable in their present recommended form for the following reasons:

- The number of roads that would be closed
- The great number of cul-de-sacs that would be created
- The DEIS conclusion, pages 3-7 states, "The new-alignment freeway does not decrease demand on existing US-31 enough to attain an acceptable LOS on existing US-31. Existing US-31 would require capacity increases in order to attain acceptable LOS."

Alternative J1 would close 11 roads, table 3.3-5 pages 3-16 roadway segment C1, C2. Alternate F/J1 would close 17 roads, table 3.3-4, pages 3-13 roadway segment C1, C6. Alternative F would close 16 roads, table 3.3-2, pages 3-7 roadway segment C1, C3. Every time you close a road you in essence have created 2 cul-de-sacs. As of today there are 7 high school routes and 10 elementary routes that would be effected by proposal F, F/J1. Therefore, 34 turn arounds created by cul-de-sacs are very dangerous bus stops. A bus needs to back up to change direction and the Michigan Department of Education recommends that school districts eliminate as much backing as possible. Cul-de-sacs are also the last parts of roadways to be plowed in the winter leaving these roads a difficult place to maneuver a bus. 96<sup>th</sup> Avenue and 72<sup>nd</sup> Avenue would be the only north south roads open to through traffic in the Zeeland Public School District. The extra time and miles needed to accommodate the proposed bypass would also lead to the need of purchasing additional busses. This problem is addressed in the study in only one sentence DEIS pages 5-10 "Access restrictions, and construction of cul-de-sacs, temporary construction impacts, and property purchase for right-of-way may be considered adverse impacts." Alternatives J1, F/J1, and F all will have adverse impacts on the Zeeland Public School district.



The other area of concern is the number of acres that will be lost in alternates F, J1/F and J1. There could be 443 acres lost to wetland mitigation in the Zeeland Public Schools boundary area. Over 2,040 acres would be lost to future development if alternative F/J1 were selected. Not all of those acres are in the Zeeland Public School District; however, the majority does fall within our boundaries.

We provide this information as a resource to be used in the US-31 Location Design Study. If further information is needed, or if we can assist you in anyway, please let us know.

Sincerely,



David J. Meeuwsen  
Transportation Director, Zeeland Public Schools



Gary Feenstra  
Superintendent, Zeeland Public Schools



David VanGinhoven  
Assistant Superintendent of Business Services,  
Zeeland Public Schools

C: Gord Ellens  
Bill Driesenga  
Les Hoogland  
Sen. William VanRegenmorter  
Ed Berghorst  
Zeeland Board of Education  
Ed Hanenburg  
Harris Schipper

**Zeeland Public Schools, December 10, 1998**

1. Acknowledged receipt of the school's concerns regarding road closures and cul-de-sacs. The Preferred Alternative does not include any work in the Zeeland school district. Only two roads will have cul-de-sacs, Johnson Street and 120<sup>th</sup> Avenue at M-104. All others will have intersections or overpasses and are not in the Zeeland school district.
2. Wetland impacts have been minimized during the study process. The Preferred Alternative impacts less than three acres in Robinson and Crockery Townships.

## AGHAST

218 S. Beacon Blvd.  
Grand Haven, MI 49417

January 11, 1999

Jim DeSana, Director  
Michigan Department of Transportation  
425 West Ottawa  
P.O. Box 30050  
Lansing, MI 48909

**RECEIVED**

JAN 13 1999

DIRECTOR  
Department of Transportation

Dear Mr. DeSana,

The Grand Haven City Council has taken the position of opposing developments to US-31 (more specifically, Beacon Boulevard in Grand Haven), that would EITHER create a freeway through Grand Haven OR expand Beacon Boulevard into a 6 or 8 lane boulevard with no median and closed side streets.

Members of AGHAST (Area of Grand Haven Against Six-lane Traffic) fully support our City Council's position in opposition of these proposed changes to Beacon Boulevard. In support of the City Council, we asked many of the local business owners if they would post the enclosed petitions in their business area and ask customers and clients to read the petitions and, if they (the customers) agree with the content, to then sign in support of the Council.

We believe it is important to note these petitions were "on the street" for only a few weeks (approximately December 18th, 1998 to January 8th, 1999) and that this time frame was during the holidays in which most business owners did not have time or resources to do much more than just set the petitions on a counter for customers to find and read as the customers might. Further, we ask that you note there were no people actively pursuing signatures (i.e., going door-to-door or standing at business entrances explaining the petition and asking for signatures). As such, we believe the number of signatures is a mere minimum of what we could have secured had we had the time and resources to do a house-to-house and person-to-person petition drive.

In light of the above, it is our belief that the number of signatures of these petitions (953) is a fair indication that the citizens of Grand Haven are in full support of the City Council's opposition to the expansion plans and, that MDOT decision makers should consider the significant majority of the citizens of Grand Haven area are in full support of the City Council and will oppose any MDOT decision to expand Beacon Boulevard to 6 or 8 lanes or turn it into a freeway.

We thank you for your attention to this letter and the enclosed petitions.

Sincerely,

  
Jeffrey A. Terrill  
Member, AGHAST

T:\com\terrill.jr

# **Petition to: Michigan Department of Transportation**

We the citizens of the Grand Haven area.

**OPPOSE** the solution to the long term traffic issue related to the anticipated growth of Ottawa County that would mandate expanding Beacon Boulevard into a freeway **OR** a 6 to 8 lane boulevard with no median and closed side streets.

**SUPPORT** The solution which calls for the construction of an additional bridge across the Grand River located at or near the 120th Street corridor.

If you agree with the two statements, please sign the petition.

SIGNATURE	PRINT NAME	ADDRESS	PHONE
<i>Kristin M. Charles</i>	Kristin Charles	1623 1/2 Fulton	850-9210
<i>Handi B. McKay</i>	Handi B. McKay	1327 Columbus Ave	846-8891
<i>Joel L. Schindlbeck</i>	Joel L. Schindlbeck	1126 Columbus	844-5661
<i>David Tate</i>	David Tate	17564 Whippoorwill	847-8970
<i>Kaleena Quinn</i>	Kaleena Quinn	16151 Mercury	842-3468
<i>Sarah Meinel</i>	Sarah Meinel	14629 Parkwood	846-7387
<i>Jarrod Cook</i>	Jarrod Cook	17199 Ferris	846-6892
<i>Kasey Marden</i>	Kasey Marden	14843 152nd Ave	846-3024
<i>Herbert M Blair</i>	Herbert M Blair	16173 Dawnview	842-0092
<i>Suzanne Smart</i>	Suzanne Smart	13351 State Rd.	846-3908
<i>Mary Jane McBeath</i>	Mary Jane McBeath	16245 Ferris, 611	842-0877
<i>Duane R. Sturns</i>	Duane R. Sturns	13600 Forest Park	844-6393
<i>Carolyn VanWieren</i>	Carolyn VanWieren	13534 Redbird	842-6635
<i>Jean A Doyle</i>	JEAN A DOYLE	18940 Army Point	847-6787
<i>Shirley Baker</i>	Shirley Baker	14748 Lakeshore C.	842-6243
<i>T.A. Bogzaert</i>	T.A. BOGZAERT	17220 (2nd) Creek	842-4327
<i>Ruth Weavers</i>	Ruth Weavers	17577 Park Place Cir Spring Lake MI	842-2266
<i>William Bissell Jr</i>	William Bissell Jr	17375 Blainfield Spring Lake MI	847-0642
<i>Mike McKeough</i>	Michael A. McKeough	19064 Lowell Spring Lake MI	

SAMPLE OF PAGE OF  
SIGNATURES - ORIGINALS  
ON FILE AT MDOT

**AGHASt (Area of Grand Haven Against Six-lane Traffic), January 11, 1999**

1. Acknowledge receipt of letter and petition opposing a widened boulevard on US-31. Please refer to correspondence in the section between MDOT and the City of Grand Haven. The PA includes widening only between approximately Washington and Jackson Streets
2. Acknowledge support for a second Grand River crossing at or near 120<sup>th</sup> Avenue. The Preferred Alternative includes a crossing just west of 120<sup>th</sup> Avenue.

## Resolution to Michigan Department Of Transportation

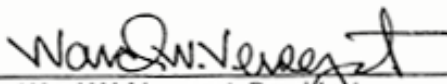
**WHEREAS**, the Coopersville Chamber of Commerce, Coopersville, Michigan and the surrounding environs will be impacted by the eventual location of the U.S. 31 improvements; and

**WHEREAS**, the Coopersville area is concerned with the possible use of the Grand River crossing at 68<sup>th</sup> Ave with connection at I-96. Knowing current traffic in excess of 58,000 vehicles daily, the U.S. 31 crossing in Grand Haven needs an alternate route to carry this and future growth;

**THEREFORE, BE IT RESOLVED** that the Coopersville Chamber of Commerce does hereby support the communities of Ferrysburg City, Grand Haven Charter Township, Grand Haven City, and Spring Lake Township to find a long term solution to the U.S.31 problems, specifically:

1. We support the construction of a by-pass at, or near, 120<sup>th</sup> Avenue with a Grand River crossing in a manner which most effectively connects the Holland region to the Muskegon region such that regional and state traffic can quickly, safely and less obtrusively reach their destinations.
2. We are of like mind that the best long term option, with the greatest transportation benefits, is the July, 1996 version of Alternative F, to provide a direct interstate link along the shortest route possible between the current U.S. 31 north of Holland and I-96 in Nunica. Such transportation benefits justify the increased environmental mitigation costs associated with crossing the Pigeon Creek.
3. We believe this resolution substantially states the best long-term option desired by the region.

Respectfully submitted this the 2 day of APRIL, 1998

  
Ward W. Verseput, President  
Coopersville Chamber of Commerce

  
Jan Richardson, Director  
Coopersville Chamber of Commerce

COPY

**Coopersville Chamber of Commerce, April 2, 1998**

1. Acknowledge receipt of the City's resolution of support for a bypass at or near 120th. The Preferred Alternative includes a two-lane roadway just west of 120<sup>th</sup> Avenue that also includes a new crossing of the Grand River. Further, the Preferred Alternative no longer includes a Pigeon Creek crossing.



## OTTAWA SOIL AND WATER CONSERVATION DISTRICT

16731 Ferris St., Grand Haven, Michigan 49417  
616/846-8770

January 7, 1999

SUBJECT: Proposed US-31 Improvements

Mr Jose Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr Lopez:

The Ottawa Soil and Water Conservation District Board of Directors was given the opportunity to review the Draft Environmental Impact statement for the proposed improvements to US-31 from I-196 in Allegan County to I-96 in Muskegon County.

The District Board of Directors would like to discourage adopting any of the alternatives that involve a bypass around Zeeland as these alternatives would have the greatest adverse impact on agricultural land, both at present and in the future. The Board would like to see any alternative that is adopted include a plan for future use by the County that would alleviate traffic flow problems through the year 2020.

Thank you for giving us the opportunity to comment on the proposed US-31 improvements.

Sincerely,

*Bill Miller* /sw

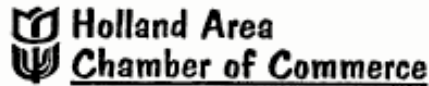
Bill Miller, Chairman  
Ottawa County SWCD  
Board of Directors

SOIL FURNISHES YOU WITH THE ESSENTIALS OF LIFE  
CONSERVE IT



**Ottawa Soil and Water Conservation District, January 7, 1999**

Acknowledge receipt of their letter of opposition to alternatives including a Holland/Zeeland bypass. The Preferred Alternative does not include a segment that bypasses around the City of Zeeland, therefore agricultural impacts have been minimized.



## US-31 Recommendation

January 18, 1999

### BACKGROUND

US-31 is a major transportation corridor in the Holland area and transportation is a critical element for business success. At this time public input is being sought by the Michigan Department of Transportation (MDOT) for the alternatives that are under consideration for improvements to US-31 (maps attached). Research has been conducted on the various US-31 alternatives by the MDOT and their consultants, the Macatawa Area Coordinating Council, local units of government and many others. The Holland Area Chamber of Commerce Environment & Infrastructure Committee has developed priorities of Economic Impact, Transportation Demand and Smart Growth Initiatives and considered the alternatives against these priorities.

### ANALYSIS

Economic Impact analysis has shown that the business displacement, tax loss and job loss is far too great with the alternatives that would put a freeway on the existing alignment. Thus, routes that do not require additional right-of-way acquisition in commercial or industrial areas have been eliminated from consideration.

Transportation Demand analysis shows that industrial, commercial and residential travel demands will continue to expand throughout the region. This supports the idea that separation of local commercial and residential traffic from long distance trucking and through-traffic will continue to be a critical factor. An improved boulevard on the existing alignment for local traffic, coupled with a by-pass around the urbanized Holland-Zeeland area for through-traffic will serve this need.

Smart Growth Initiatives must be utilized by local municipalities in order to maximize the positive impacts of development fostered by this transportation improvement, while minimizing the negative impacts. Municipalities that wish to advance their economic growth will have an opportunity to capture increased development demands, but should do so with an eye toward the ultimate impact on the character of the community. Conversely, municipalities that wish to deter growth from their area, have the ability to restrict development through effective land use planning, zoning and site plan review.

### RECOMMENDATION

At its regularly scheduled meeting of January 18, 1999, the Holland Area Chamber of Commerce Board of Directors unanimously endorsed the Environment & Infrastructure Committee recommendation of the US-31 alternative F/J1, with additional elements as suggested, and the implementation of the following improvements to the US-31 Corridor:

- Transportation System Management Improvements - implement low cost capital improvements to ease congestion until a more permanent solution is constructed.
- Intelligent Transportation Systems Improvements - implement technologies such as demand responsive traffic signals and traveler information systems as appropriate.
- Transit Components - incorporate various transit components such as carpool lots and inter-modal facilities into other improvements as appropriate.
- ROW Acquisition and Future Development Controls - right-of-way acquisition and effectively managing development is essential in order for the timely implementation of the recommendations.
- Boulevard Improvements - construction of a narrow median boulevard through the City of Holland and Holland Township.
- Freeway Improvements - construction of a freeway north of the Holland/Zeeland area along the 120th Avenue corridor across the Grand River to I-96 with a freeway connector to existing US-31.
- Holland-Zeeland Bypass - construction of a freeway bypass from I-196 around the east side of the City of Zeeland with a connection to the freeway at 120th Avenue.

**Holland Area Chamber of Commerce, January 18, 1999**

Acknowledged receipt of the Holland Area Chamber of Commerce's US-31 recommendations in support of Alternative F/J1. The PA includes critical segments of F/J-1 including improvements to existing US-31 between approximately Lakewood and Quincy.



Phone (616) 772-2494

<http://www.zeelandcofs.org>

149 MAIN PLACE  
ZEELAND, MICHIGAN 49684

Fax (616) 772-0065

FOR IMMEDIATE RELEASE

Date: January 20, 1999  
From: Ann L. Query, Executive Director  
RE: Zeeland Chamber of Commerce Board recommendation for US 31 alignment

At their meeting on Thursday, January 14, the Zeeland Chamber of Commerce Board of Directors voted unanimously to support the alignment recommendations proposed by the Macatawa Area Coordinating Council's US 31 ad-hoc committee. Citing strong support for immediate improvements to the current US 31 highway, the group expressed concern over safety issues with that road at present. Continuing growth and development along that alignment and in the area in general will exacerbate the safety concerns with that highway. The 120<sup>th</sup> Avenue corridor freeway, new bridge construction, and connection to I-96 will address near-future needs for traffic congestion and safety.

The group expressed sympathy with the concerns of rural townships which will be affected by the proposed bypass to the east of Zeeland. However, the long-range projections for growth in the area, as well as a need for safe access to and from industrial areas, will mandate the building of this bypass. Growth will continue, and the best way to manage that growth is to be proactive in planning for the future. It was recommended that representatives from Zeeland Charter Township, Bledon Township, Olive Township, Zeeland Public Schools, City of Zeeland, Zeeland Chamber of Commerce, and logistics/traffic experts from local industry meet to make recommendations for interchange and overpass locations and utility access points. This will help to ensure the best possible outcome for a positive quality of life in the area.

# # #

**Zeeland Chamber of Commerce, January 20, 1999**

Acknowledged receipt of their support for Alternative F/J1. The PA includes critical segments of Alternative F/J-1.

November 24, 1998

An Open Letter to Ottawa County Residents:

In reviewing the long-awaited Draft Environmental Impact Statement (DEIS), we find that the following facts have been presented:

- |   |   |
|---|---|
| 1. Grand Haven has a traffic problem on US 31 at the present time that must be addressed. (DEIS page 2-5)   | 1 |
| 2. That traffic problem will remain and continue to increase in the future unless action is taken. (DEIS page 2-14)   | 2 |
| 3. <b>No</b> local or regional <b>bypass</b> is going to give <b>sufficient relief</b> to the traffic problem on US 31 at the Grand River without an increase in the capacity or a decrease in the demand on the existing US 31. (DEIS page 3-7) [A look at the traffic projections will tell you that a bypass solution is not the most effective way to decrease demand on the US 31 route.]  | 3 |
| 4. Beacon Blvd. is going to be changed no matter which alternative is selected. If the Comstock Bypass (boulevard bypass) is selected, Beacon is slated to become a 6-lane boulevard (DEIS 3-22). If Alternative F (one Central Bypass option) is selected, Beacon is slated to become an 8-lane boulevard (DEIS figure 3.3-5b)   | 4 |
| 5. The total number of bridge malfunctions from 1988 through May 15, 1997 was ten. One failure resulted in 18 hours, 15 minutes of down time for the bridge. This does not list those incidents which stopped traffic due to accidents on or near the bridge resulting from <b>bridge openings</b> . (DEIS page 2-14) [The problem is not just malfunctions. Any mechanical bridge is subject to high maintenance needs and failures, and contributes to traffic congestion.] | 5 |
| 6. Through numerous conversations with people in and around Grand Haven, we believe many people think a boulevard option on US 31 includes a fixed-span bridge, solving the problem of bridge malfunctions. <b>However</b> , of the nine alternatives offered in this study, <b>only two would place a fixed-span bridge</b> in Grand Haven (J1 and A). Both of these place a limited access highway through Grand Haven on the existing US 31. (DEIS page 3-18 and 3-6)      | 6 |
| 7. All 2020 alternatives except the No Action Alternative <b>would take approximately the same amount of land through Grand Haven</b> to increase traffic volume. (Appendix A – Plans of Practical Alternatives)  | 7 |
| 8. The <b>rate of return on dollars invested</b> varies widely: for example, Alternative A (limited-access highway on the existing route) returns \$2.78 for every dollar spent; Alternative F (one central bypass limited-access option), returns \$0.98; and Alternative P (boulevard option on existing route), returns \$0.42. (DEIS page 5-106) [Note: any return of less than \$1.00 means the construction costs on the option <b>exceed</b> the benefit provided.]    | 8 |
| 9. A central bypass would be directly contrary to the <b>1992 Ottawa County Development Plan</b> adopted by the County Planning Commission on December 22, 1992. This Plan relegates Agricultural and Rural Preservation Land to their defined “Tier B”. One of the stated goals of this Plan is “ <b>to maintain the rural character of Tiers A and B</b> ”. (DEIS page 5-20 and 21, and Figure 5.2-2)   | 9 |

(cont'd. next page)

November 24, 1998

An Open Letter to Ottawa County Residents:

For several years now, we have been told by officials from many agencies and levels that no decision would be made until the DEIS was released. Now that it is available, we **strongly urge that all** involved in recommendations and decisions read and understand the facts as they are presented. We further urge all those officials not to shrug off the concerns of the central county townships and residents as being merely a case of "Not In My Back Yard". The facts presented in this study speak for themselves.

We further urge all residents in the county to take the time to find out more about the facts presented in this study – it is available in many public locations, and several townships have fact-sharing meetings scheduled. In many ways, understanding the facts presented in this study and making your opinion known will be more important to your futures than many of the elections in which you have voted.

We also call on you, the county residents, to hold all officials accountable to see that proper action is taken to solve the present and future traffic problems on US 31 while we have the resources available. Officials should focus on the US 31 issue and not attempt to divert attention or resources to solve other county road issues. Those can be addressed fully, but not as part of this issue.

Gord Ellens, Supervisor,  
Zeeland Charter Township  
(616) 772-6701

Tim Dykstra, Supervisor,  
Olive Township  
(616) 786-9996

Ray Masko, Supervisor,  
Robinson Township  
(616) 846-2210

Michael Fortenbacher, Supervisor,  
Crockery Township  
(616) 837-6868

Cliff Murray  
Crockery Township Resident  
15760 120<sup>th</sup> Avenue, Nunica  
(616) 837-1064

Conni Schaftenaar  
Zeeland Township Resident  
3755 72nd Avenue, Zeeland  
(616) 837-7387 (days) or 772-4660 (eves.)

Nancy Zennie  
Zeeland Township Resident  
7723 Quincy Street, Zeeland  
(616) 875-7811

Thom Peterson  
Robinson Township Resident  
12134 112th Avenue, Grand Haven  
(616) 846-8875

Jack Fisher  
Crockery Township Resident  
15385 120th Avenue, Nunica  
(616) 837-6372

Tom Mellema  
Crockery Township Resident  
16496 124th Avenue, Nunica  
(616) 837-6973

cc: all signers above, editors of regional newspapers, reporters covering US31 issue, Ottawa County Commissioners, Ottawa County Transportation & Land Use Committee, Ottawa County Planning Commission, Road Commission, other Township Supervisors, officials in affected cities/village, MACC, elected officials for area, MDOT, URS Greiner, FHWA, other interested agencies. Also will be distributed to interested citizens at township meetings throughout the comment period.

**Open Letter to Ottawa County Residents, November 24, 1998**

2. Comment acknowledged
3. Comment acknowledged
4. Comment acknowledged
5. The Preferred Alternative in Grand Haven includes improvements to existing US-31. These include adding a third through lane (six-lane boulevard) in Grand Haven from south of Washington Street to Jackson Street in the median and additional turning lanes north of Jackson Street.
6. Comment acknowledged
7. The Preferred Alternative does not include replacement of the existing bridge.
8. Comment acknowledged.
9. Comment acknowledged.
10. Ottawa County now supports the Preferred Alternative.



**MICHIGAN UNITED CONSERVATION CLUBS**

2101 Wood St. • P.O. Box 30235 • Lansing, MI 48909 • 517/371-1041

November 17, 1994

Mr. Scott Cook, Environmental Planner  
Greiner, Inc.  
3950 Sparks Drive SE  
Grand Rapids, Michigan 49546

Re: Scoping Document, US-31 Location Design Study

Dear Mr. Cook:

On behalf of the Michigan United Conservation Clubs, I would like to submit the following comments on the above-referenced scoping document.

In general, we concur with the list of issues you have presented. We are particularly concerned about impacts of the proposed project on the wetlands and water resources at proposed crossings of the Grand River and other watercourses. We are anxious to review the draft Environmental Impact Statement with respect to these issues.

Another area of concern is the induced development that would likely occur in rural areas adjacent to the corridor eventually selected as the preferred alternative. This issue would be assessed under the "Land Use" and "Secondary and Cumulative Impacts" categories in your list of Key Issues. We are not necessarily in agreement that these issues are of lesser significance than other impact categories you have identified. We suggest that they be given careful consideration as the DEIS is developed.

Thank you for this opportunity to provide these comments. We anticipate substantial involvement in the review process and would appreciate periodic updates on your progress on the DEIS as this project moves forward.

Sincerely,

Richard X. Moore  
Water Resource Specialist

cc: Glenn Geerlings

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**Michigan United Conservation Clubs (MUCC), November 17, 1994**

1. Every effort has been made to reduce impacts to wetlands and water resources related to the current Preferred Alternative. At the Grand River, the entire 100-year floodplain is spanned by a structure. Mitigation efforts for wetlands and water resources are detailed in **Sections 4.9** and **4.10** of the FEIS.
2. Indirect and Cumulative Impacts are addressed in the FEIS process. MDOT retained MSU to develop a Land Use Study Model for the study area, and the adjoining counties. The results of this Study are detailed in **Section 2.2** and at [www.us31.msu.edu](http://www.us31.msu.edu).



Jan 8, 1999

Jose A. Lopez  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

**Comments on the US 31 Improvement Draft Environmental Impact Statement  
Submitted by The Michigan Land Use Institute  
to the Michigan Department of Transportation**

The Michigan Land Use Institute is an independent, nonprofit, research, educational, and service organization operating in the public interest. Our mission is to establish a fresh approach to economic development that strengthens communities, enhances opportunity, and protects the state's unmatched natural resources. The Institute's approach to land use policy reform is pro-business, pro-community, and pro-environment.

The Institute advocates relieving congestion by stopping sprawl, improving the functioning of roads, and giving people travel choices in addition to their cars. The means for this are better-designed roads, clean and convenient mass transit, safe routes for pedestrians and bicyclists, and strong neighborhoods and downtowns.

The Institute appreciates the effort the Michigan Department of Transportation (MDOT) and the Federal Highway Administration (FHWA) have made to thoroughly evaluate the benefits and harms likely to result from various proposals to improve traffic on U.S. 31. The Institute also respects the difficulty of this endeavor and the inability of the study to identify a preferred alternative to meet the areas transportation needs.

After conducting its own review of the Draft Environmental Impact Statement (DEIS), the Institute believes it is clear that the best alternative is to improve U.S. 31 along its *existing alignment*. The Institute urges MDOT and FHWA to examine **Alternative A**—constructing a Freeway on the existing U.S. 31 alignment. This study should couple Alternative A with Transportation System Management and Transportation Demand Management measures given only cursory attention in the DEIS.

The Institute believes the study was conducted in a manner that understates the harm to the environment and communities caused by several other alternatives, and does not fully identify the benefits provided by

reconstructing the current U.S. 31 corridor. To guide its additional investigation, the Institute urges the MDOT and FHA to consider the following items.

#### TRANSPORTATION AND LAND USE GOALS

Transportation and land use are intimately connected. Decisions about where to locate new roads determine the pattern of development of the land. Opening up land to automobile access is one of the driving forces in Michigan's loss of farmland, currently at 10 acres per hour. Stemming this loss is one of the top land use goals across the state and a high priority of the new state Legislature.

Building a new bypass through the farmland east and south of Grand Haven will cause tremendous change in land use. The DEIS confirms the bypass will result in farmland — the farmland inventoried in Section 4.3 — being converted into subdivisions and commercial and retail development. These changes in land use are well described (Sect. 5-27).

The DEIS, however, fails to acknowledge that preserving farmland is a widely supported public policy. It also does not consider that the predicted changes in land use will harm local taxpayers, who will bear the costs associated with outlying, sprawling development — namely tax money spent for more sewers, more local roads, and more municipal services.

Although some engineers argue that controlling urban sprawl is a matter for local planning and zoning, the Institute believes that MDOT has an obligation to avoid creating stresses that place undue demands on land use. MDOT is in the enviable position of having a statewide view of land use, a view that local officials often never see. When new road construction enables sprawling new land development — as happened when bypasses were built around several other Michigan cities — all of our resource-based industries suffer, from agriculture to tourism.

Wetlands losses also are understated in Section 5-65 of the DEIS. This evaluation does not appear to include the loss of wetlands from the secondary and cumulative effects, such as changes in land use resulting from building any of the bypass options. A more accurate evaluation would show that any alternative, including constructing a bypass, will be more harmful than indicated.

The Michigan Land Use Institute supports effective transportation solutions, but not those that promote sprawling development. Any improvements to US-31 should be made along the current alignment. In this way, new lands will not be opened up for development, and the existing infrastructure will be useful long into the future.

#### INDUCED DEMAND

Communities throughout the world are quickly learning that building more and wider roads does not eliminate congestion. Rather, new roads cause more traffic. This phenomenon is known as "induced demand."

Sprawling development far from established population centers leads to more car trips, longer trips, and more traffic as people drive farther and farther between destinations. The DEIS predicts that building any of several bypass alternatives will cause just this type of development. Alternative F is likely to cause the greatest amount of Induced Demand.

The DEIS, however, does not incorporate an evaluation of the induced demand caused by the various alternatives that include building a new bypass. Without this evaluation, the DEIS dramatically overstates the transportation benefits of these options.

If induced demand were incorporated into an evaluation, improving U.S. 31 along its existing alignment likely would be shown to be superior to other alternatives. It would reduce travel demand, decrease energy consumption relative to the other alternatives, and reduce congestion in the region more than if a bypass were built. If this vital, induced-demand evaluation were done, the various bypass alignments may no longer appear beneficial to the region, or a wise investment of taxpayer dollars.

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2b

2c

#### RESPECTING TAXPAYERS AND THEIR INVESTMENTS

MDOT and FHA are responsible for not only meeting the mobility needs of Michigan's residents, but also wisely investing people's tax dollars in transportation infrastructure.

U.S. 31 already has fallen into a state of disrepair, and the DEIS considers the Grand River Bridge also to be below par. Last year, the state had to raise taxes in order to maintain the existing road network. The public should be concerned that if the new bypasses are built, taxes will have to be raised again in order to maintain the expanded network. Otherwise, the region will just have more roads in poor condition.

The DEIS should evaluate the long-term costs of maintaining the road network proposed in each of the alternatives. Such an analysis would show that investing in *existing* roads, rather than new roads, is less costly over the long term and of greater benefit to Michigan's drivers.

When roads are in good condition, the driving experience is more pleasurable, individuals spend less on automobile maintenance and repair, and traffic flows more smoothly. Simply bringing the region's roads into good condition could, in and of itself, provide a tremendous benefit.

The DEIS does not fully evaluate how an investment to bring 80% or more of the region's roads into good condition would improve regional mobility. Such an alternative would have virtually no impact on land use, environment or community. It warrants further examination.

In addition, our tax dollars should be used to support the types of land use and land conservation desired by Michigan's citizens. Alternatives that result in a loss of farmland are not in the public's interest. Serious thought should be given to any decision that uses tax dollars in a manner contrary to stated public goals.

#### IDENTIFYING REAL NEEDS

The DEIS identifies two critical failings in the current transportation network.

One is the need for a new river crossing due to the periodic failure of the existing bridge, which lifts up to accommodate large ships on the Grand River. According the data in the DEIS, bridge failure happens less than once per year. This problem alone is not sufficient reason to embark on a road building project that will dramatically alter land use patterns in the region. Rather, the DEIS should have considered an alternative to install a new engine in the bridge mechanism.

The DEIS also acknowledges a need to relieve future traffic congestion in a rapidly growing region. Efforts to manage travel demand, however, are not seriously considered. An investment in public transportation of a similar magnitude to the cost of any of the bypass alternatives would eliminate a great number of vehicle trips. Improvements to the condition and performance of existing roads also would have great benefit, and avoid the induced demand resulting from a bypass, as discussed above. One further option that would have the added benefit of reducing congestion through Grand Haven when the bridge is drawn is the installation of an intelligent highway system that recognizes immediate and shifting demands placed on the network.

Although the bypass solution is an attractive way to sidestep the problems that precipitated the study, it is far from ideal. The real needs identified in the DEIS can be met with low cost, efficient alternatives that do not disrupt community or harm the environment.

#### CONCLUSION

Building a new road, even if it is a bypass, cannot solve all the region's transportation problems. Future study must seriously examine how new road building will affect land use and transportation needs in the future. The DEIS omits this important analysis, and overstates the benefits of several alternatives that involve bypass construction. The Michigan Land Use Institute believes that such analysis will show that improving the existing U.S. 31 corridor is the best alternative.

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**Michigan Land Use Institute, January 8, 1999**

Many of the following answers refer to the US-31 Land Use Study prepared by Michigan State University. However, the Land Use Study is not a component of the FEIS, but can be found at [www.us31.msu.edu](http://www.us31.msu.edu).

**1. Transportation and Land Use Goals**

- a. During a ten year period (1990-2000), the study area experienced growth at a rate higher than the state average. Ottawa County, in particular, had a 27% increase in population. Correspondingly, the amount of open land (farmland included) declined by 3%. This development occurred absent any major transportation improvement. The amount of direct impacts to farmland has been greatly reduced since the release of the DEIS, from 1,039.9 acres to 115.8 acres in the current PA. Land use changes are regulated by local governments.
- b. The US-31 Land Use Study concluded that development pressures will continue in Ottawa County, although at a lesser rate than that of the previous decade. The study compared the indirect land use impacts between the No-Action and the Preferred Alternative. Comparing the alternatives in 2020 shows that the difference between the acres of open land converted to built land uses is negligible.
- c. According to the US-31 Land Use Study, the number of acres classified as agricultural was 217,728 in 2001. The number of acres is predicted to decrease by approximately 4,300 acres in 2020 without the US-31/M-231 project. The number of acres is predicted to decrease by approximately 4,400 in 2020 with the Preferred Alternative.
- d. Land use development and control is ultimately a local decision. However, MDOT will work with local land use officials cooperatively in making land use decisions. The data and analysis completed for the US-31 Land Use Study provides local land use officials with tools to use in making future land use decisions. Farmland impacts were extensively considered in the DEIS and are included in **Section 4.2** of the FEIS. Every consideration was made to minimize farmland impacts through modifications to the route alignment to avoid splitting farms and maintaining access.
- e. Through the refinement of alternatives, the impacts to wetlands, farmland operations and communities were significantly reduced. (See **Table 4.1-1**) It is estimated that the Preferred Alternative will only impact less than three acres of wetland.
- f. Alternative A, which includes construction of a limited-access freeway on existing US-31 to M-104 in Ottawa County does not meet the "Purpose and Need" of the project.

**2. Induced Demand**

- a. Land development patterns indicated that new developments are locating east of US-31 as opposed to adjacent to US-31 by choice without any major new transportation facilities (See US-31 Land Use Study). The Preferred Alternative provides access to this development and an alternative crossing of the Grand River in addition to meeting the Purpose and Need for the project.

- b. The US-31 Land Use Study, developed after the DEIS, did consider the effects of induced demand. The amount of induced demand was measured by the forecasts of land expected to be converted from open land to built land.
- c. Alternative A was included for evaluation in the US-31 Land Use Study. In addition to not meeting the project's "Purpose and Need", it did not substantially reduce the conversion of open land to built land, because development pressures are so great in Ottawa County due to factors besides transportation.

### **3. Respecting Taxpayers and Their Investments**

- a. Since the DEIS was published road segments on US-31 in poor condition have been repaired. Further, signals have been upgraded in the cities of Holland and Grand Haven to improve traffic flow and increase safety. Over 80% of MDOT's budget is spent on maintaining and rehabilitating existing state highways. However, safety and operational problems on US-31 exist and require improvements that are more extensive than preservation or maintenance activities. Additional access across the Grand River in Ottawa County is also important to provide an alternative to the existing crossing. Traffic generated from new growth and development will further tax the capacity of existing local roadways as well as US-31. Long-term maintenance costs for the overall transportation system in Ottawa County are expected to be similar between the alternatives.
- b. Comment acknowledged. MDOT's 2008-2012 Five Year Transportation Plan balances new construction with preservation work and increased capacity projects.
- c. Comment acknowledged. The No-Action Alternative assumes preservation of existing US-31. County roads and city streets will be maintained by their respective jurisdictions. Historic trends and forecasts indicate that travel demand will necessitate capacity improvements, regardless of road condition. The No-Action Alternative does not meet the "Purpose and Need" of the project nor the long-term transportation needs in the study area.

### **4. Identifying Real Needs**

- a. Reconstruction and repairs to the Bascule Bridge in Grand Haven are no longer part of the Preferred Alternative. Even with mechanical and electrical repairs to the bridge, traffic volumes are expected to reach levels that will create gridlock conditions on the bridge. The need for an additional river crossing has been expressed several times during the EIS process and is detailed in **Chapter 2**. There are many elements in determining the ability of an alternative to satisfy the "Purpose and Need" of the project. The Preferred Alternative meets other needs in addition to the need for a new river crossing. The Preferred Alternative contributes to the resolution of transportation system needs and provides for a new river crossing.
- b. The Preferred Alternative does not preclude the development of transit and Intelligent Transportation Systems (ITS) as measures to reduce demand and manage traffic flow. The success of a transit is largely dependent on local investment to provide transit services, as operating costs are primarily funded through local millages and fare box revenue. Further, it is not reasonable to expect that transit use will increase to a level necessary to offset the total additional capacity required. The US-31 Land Use Study concluded that increased travel demand in the study area will occur regardless of the transportation improvements made. The

Preferred Alternative provides an alternative route for travelers to use when there are traffic incidents on US-31 which could be communicated by an ITS system. Transit and ITS alone will not meet the “Purpose and Need” of the project.

## **5. Conclusion**

The US-31 Land Use Study, completed after the DEIS, extensively examined the land use impacts of the alternatives under consideration. Further, design refinements made after the DEIS resulted in significant impact reductions to farm operations, wetlands and community impacts.



First U.S. Law to Ban  
DDT 1949

Michigan Environmental  
Protection Act 1970

Inland Lakes and Streams  
Act 1972

Sand Dune Protection  
and Management Act  
1975

Michigan Bottle Bill 1976

Solid Waste Management  
Act 1978

Wildlife Protection  
Act 1979

Michigan Used Motor Oil  
Recycling Program 1979

Hazardous Waste  
Management Act 1979

Pigeon River County  
State Forest Oil Drilling  
Protections 1980

Surface and Underground  
Mine Reclamation Act  
1982

Great Lakes Oil  
Drilling Ban 1982

Peat Mining Act 1984

Chlorane Ban 1987

Statewide Combined  
Sewer Overflow Policy  
1988

Michigan Non Point  
Source Water Pollution  
Management Strategy  
1988

Sand Dune Protection  
Act 1989

Oil Dumping Ban 1990

Grand River Citizen's  
Watershed Council 1990

Adopt-a-Stream 1991

Project Greenpace 1992

Integrated Pest  
Management 1993

West Michigan  
Sustainable  
Business Forum 1994

West Michigan  
Greenway Council 1996

Religion, Ecology & Spirituality  
Workgroup 1997

L.U.T.R.A.Q. Taskforce 1998

January 11, 1999

Jose A. Lopez  
Acting Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Dept. of Transportation  
P.O. Box 30050  
Lansing MI 48909

Re: State Project Number 33955  
Federal Project Number DPR 0045 (001)  
Draft Environmental Impact Statement

Dear Mr. Lopez:

The following are our comments with respect to the Draft Environmental Impact Statement for the U.S. 31 project:

The EIS does not give a very informative or defensible basis for its conclusion that the build alternatives will reduce ozone. In fact, these conclusions are highly suppositional and oversimplified. For instance, decreases in congestion may improve air quality, or they may be canceled out by increases in vehicle miles traveled (vmt's). One way to assure this doesn't happen is to make vmt-level maintenance or reduction a project objective as transportation projects are conceived and developed. Another way might be to do projections of vmt's in project planning and calculate their effects on air quality in relation to other factors.

It is idle to anticipate ozone-reduction benefits from ridesharing or modal changes to bicycles and rail, unless you are undertaking some measure of comprehensive planning for these outcomes. Only by planning to achieve such benefits can you have some reasonable assurance of achieving them. Therefore, comprehensive TSM-type, demand-management planning should be a concomitant of all the alternatives and of any selected recommendation.

In the required regional ozone-reduction analysis to follow the recommendation of an alternative, I would like to see MDOT make use of more extensive ozone computer modeling capabilities of the type being used by the MDEQ. Actually it would make more sense to do that prior to the selection of an alternative, in case a CAAA nonconformity should be identified. The EIS seems to view this as not very likely, but I can see it possibly happening if the analysis is sufficiently detailed as to reflect fundamental realities of air quality physics.

1432 Wealthy St. SE Grand Rapids, MI 49506 (616) 451-3051 FAX (616) 451-3054

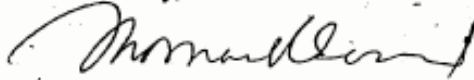
The EIS also talks a lot about carbon monoxide but not much about particulates, hydrocarbons, oxides of nitrogen, lead, sulfur dioxide.

It ought to be possible to provide a graphic calculus or computer model demonstrating how air pollution of various types varies with vehicle speed, distance traveled, fuel efficiency and other factors.

The DEIS does nothing along this line other than to suggest that there will be park and ride lots, bike paths, and connectivity of existing bike paths. It does not indicate or discuss any sort of rail service at all, even though a rail route already exists along the current US 31 route and might be converted readily to provide passenger service between Muskegon, Grand Haven and Holland.

Thank you for the opportunity to comment on the DEIS.

Sincerely,



Thomas J. Leonard  
Executive Director

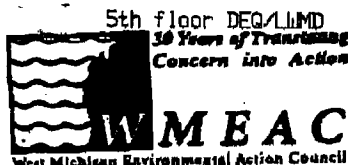
**West Michigan Environmental Action Council (WMEAC), January 11, 1999**

Acknowledged receipt of WMEAC's letter and concerns with the level of documentation included in the DEIS for:

- Air Quality
  - Transit (Park'n'Ride)
  - Non-motorized Facilities.
1. A new Grand River crossing would be provided by the Preferred Alternative, near 120th Avenue. The new river crossing is expected to reduce some trip lengths now being forced to use congested bridges on more indirect routings or long detours in the event of a closing of the bascule bridge.

Ozone level emissions are calculated with regional MPO air quality and travel demand models, **Section 4.6**. Vehicle Miles of Travel (VMT) projections are part of the MPO and state travel demand modeling process and were considered during the air quality conformity process, as required.

2. A comprehensive TSM analysis was completed. Some TSM improvements have already been implemented on segments of US-31 in Holland and Grand Haven. TSM improvements are short-term, low capital improvements that complement the Preferred Alternative. These will continue to be implemented as traffic conditions warrant.
3. **Section 4.6** of the FEIS discusses Air Quality. The MACC, WMSRDC and GVMC MPOs and State of Michigan all have conforming plans, which include the Preferred Alternative in the travel demand model and as required by federal regulations. Future MPO plans and TIPS will address air quality conformity as required for the project.
4. Transit is discussed in **Section 3.4**. While transit alone will not satisfy the Purpose and Need, types of transit could be implemented with or without the Preferred Alternative, including rail transit. It is however, it is neither feasible nor reasonable to expect transit ridership to completely eliminate the need for highway improvements. (MDOT will work with local agencies to identify opportunities to enhance non-motorized trails. MDOT will work with local agencies to identify the need for Park & Ride, as interest and demand warrants.)



Fax: 517-373-9965

Dec 28 '00 13:46 P.02

First U.S. License to Ban  
DOT 1989

Michigan Environmental  
Protection Act 1970

Indiana Lake and Stream  
Act 1971

Sanctuary Protection  
and Management Act  
1976

Michigan Basin BUI 1974

Solid Waste Management  
Act 1978

Michigan Partnership  
Act 1979

Michigan Used Motor Oil  
Recycling Program 1979

Hazardous Waste  
Management Act 1979

Pigeon River Corridor  
State Forest Oil Drilling  
Termination 2000

Surface and Underground  
Mineral Resources Act  
1982

Great Lakes Oil  
Drilling Ban 1982

New Mining Act 1984

Chlorine Ban 1987

Statewide Combined  
Sewer Overflow Policy  
1988

Michigan Non Point  
Source Water Pollution  
Management Strategy  
1988

Sanctuary Protection  
Act 1989

Oil Dumping Ban 1990

Grand River Citizens  
Watershed Council 1990

Adopt-a-Stream 1991

Project Overpass 1992

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West Michigan  
Sustainable  
Business Forum 1994

West Michigan  
Overseas Council 1996

Religion, Ecology & Spirituality  
Workgroup 1997

L.U.T.R.A.Q. Taskforce 1998

Lakeview 1999

Brown Patch 2000

Post-It® Fax Note	7671	Date	12/21/01	# of pages	3
To	Theresa Petko	From	Mike O'Malley		
Co./Dept.	VPS	Co.			
Phone #		Phone #	517/335-2634		
Fax #		Fax #			

December 22, 2000

Gerald Fulcher, Jr. P.E. Chief  
Transportation and Flood Hazard Management Unit  
Land and Water Management Division  
Michigan Department of Environmental Quality  
P.O. Box 30458  
Lansing, MI 48909-7958

Dear Mr. Fulcher:

This is to formally request that Michigan Department of Environmental Quality (MDEQ) retract its concurrence as a party in the NEPA/404 process in the case of the US-31 expressway project in Allegan, Ottawa and Muskegon Counties, the so-called Grand Haven Rural Bypass.

You had indicated to me in a phone call early this year that the MDEQ would cease to oppose the bypass construction along the route of alternative F/J1 inasmuch as Michigan Department of Transportation (MDOT) had agreed to elevate the expressway through the wetlands feeding into Pigeon Creek.

I remain unclear as to whether this concurrence was expressed to The Federal Highway Administration in writing, or whether it was made tacitly; and upon what scientific basis it was made.

Since then, there have been new developments and refinements in the alignment plan for F/J1. It now appears that the expressway will pass directly through a regionally significant regulated wetland known as Bruce's Bayou or Bruce's Marsh, in the area of the proposed Grand River crossing, directly eliminating over thirty acres and endangering the rest.

The most recent alignment maps published this month by MDOT show also that the specific route through the Pigeon River wetlands area has also been altered, with the possible result of a greater acreage being impacted.

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Fax: 517-373-9965

Dec 28 '00 13:47 P.03

These decisions were not made or foreseen at the time of MDEQ's apparent concurrence with the Draft Environmental Impact Statement released by MDOT for this project. However, now that the alignment has been adjusted with these results, it seems clear that MDEQ's concurrence is no longer appropriate and needs to be retracted.

WMEAC believes that because of the unique character and rare, pristine condition of Bruce's Bayou, the fact that it retains characteristics dating back before European settlement, and because it contains species of special interest and concern including rare and state-threatened species, it should not be considered a candidate for mitigation but should be AVOIDED. No mitigation plan can hope to duplicate or replace this remarkable natural area.

WMEAC also believes that it is the obligation of MDEQ under the Clean Water Act not to allow this project to proceed along these current lines, without refusing its concurrence and requiring a full and public discussion of the environmental costs now being contemplated, as well as formally justifying its position for public scrutiny.

WMEAC is requesting specifically the following:

1. MDEQ should declare its retraction of concurrence in the F/J1 alignment pending further discussion of the environmental consequences.
2. MDEQ should withhold concurrence in the F/J1 or any other alternative pending the emergence of a clear consensus, and a greater measure of finality about the route and its environmental consequences.
3. MDEQ should explain how the elevated causeway over the (currently) wooded wetlands of the Pigeon Creek—between 120th and 116<sup>th</sup> avenues, just south of Stanton—make acceptable this proposed incursion into this regulated wetland—including addressing such questions as: Is there a thermal pollution impact on this cold water fishery? How does one mitigate this impact? What about the impact of salt, sand, contaminated rubber dust, oil, heavy metal, and other runoff pollution from the quarter-mile-long elevated roadway? Has that impact been modeled? MDEQ should essentially commit to paper its scientific analysis of MDOT's mitigation plan related to the elevated roadway over Pigeon Creek.

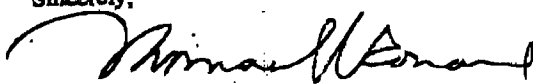
5th floor DEQ/LUMD

Fax: 517-373-9965

Dec 28 '00 13:47 P.04

Thank you for your attention and consideration of this important regional issue.  
I look forward to your earliest possible response.

Sincerely,



Thomas J. Leonard  
Executive Director

Cc: Thom Peterson, President, WMEAC  
Alan Bennett, Vice President, WMEAC  
Dan Vogler, Chairman, CSTS  
Timothy Dykstra, Executive Director, CSTS  
Jeffery Saxby, MDOT  
Sherry Kamke, EPA  
Gary Mannesto, Army Corps of Engineers  
Willie Taylor, U.S. Dept of Interior  
James Kirschensteiner, FHWA  
The Hon Senator Ken Sikkema  
The Hon Senator Glen Stail  
The Hon Rep. Patricia Birkholz  
The Hon Rep. elect Barbara Vanderveen  
The Hon Senator Leon Stille  
Julie Stoneman, Land Conservancy of West Michigan  
Norm Spring, Spoonville Gun Club  
Congressman Vern Ehlers  
Congressman Pete Hoekstra

**West Michigan Environmental Action Council, December 22, 2000**

Letter acknowledged. MDOT continued to work with agencies, including the DEQ and local units of government to revise the F/J1 Alternative and address concerns. The Preferred Alternative affects less than three acres areas in the vicinity of the bridge. There are no wetland impacts to the Pigeon River watershed. Please see **Section 4.9** for additional information on wetland impacts.

## C.3 RESPONSES TO PUBLIC COMMENTS

### C.3.1 Summary of Public Comments based on the Preferred Alternative

A summary of the comments received from the November 8, 2006 Public Meeting by individuals are grouped into broad categories and are summarized below along with a response from the US-31 study team. There was a total of twenty-seven written comments made at the November 8, 2006 Public Meeting for US-31.

Nine people supported the Preferred Alternative, and many commented they thought the project was taking too long.

*Support for Preferred Alternative noted.*

Two people opposed the Preferred Alternative, specifically the new alignment impacting farmland preservations and the serenity of life.

*Farmland preservation was put into consideration when determining the location of the new alignment. The Preferred Alternative will impact approximately 114.60 acres of farmland. This is significantly reduced from other alternatives considered. **Chapter 3** discusses the Alternatives Considered.*

Two people supported creating a full interchange at I-96/M-104.

*The partial interchange at M-104 and I-96 will be completed and the ramps at the 112<sup>th</sup> Avenue and I-96 interchange will be reconstructed to allow full access. This will require partial property acquisitions. **Chapter 3** discusses the Preferred Alternative in detail.*

Six people requested that hard copies of the Preferred Alternative draft maps be sent to them.

*Request noted, maps sent.*

One person is opposed to the new bridge location and would like to see it built at 120<sup>th</sup> Avenue.

*The current bridge placement was selected because it had the least amount of impacts to the surrounding wetlands. **Chapter 3** discusses the Preferred Alternative in detail.*

One person would like to be able to turn north on to US-31 from the Washington Street.

*Comment appreciated,*

One couple who owns the Yellow Jacket Restaurant is concerned about the limited access planned along M-45 affecting parking at the restaurant.

*Changes to the Preferred Alternative have been made to provide access to the parking lot from M-45. A traffic signal is also being proposed at the intersection of M-45 and 120<sup>th</sup> Avenue, giving customers turning time to enter the parking lot.*

One person made a comment about signal timing in Grand Haven.

*Comment acknowledged, signal timing will be considered during the design phase.*

One person questioned why the new alignment can not be further west of their house along 120<sup>th</sup> Avenue.

*The alignment can not be moved farther west because there is an extensive wetland to the west of their house and by avoiding these wetlands there is a lesser amount of environmental impacts to the study area. Please see **Chapter 4** about property acquisition and relocation.*

One person would like to know more about property acquisition.

*Please see **Chapter 4** about property acquisition and relocation.*

One person thanked us for invitation and the information about the project.

*Comment appreciated.*

### **C.3.2 Summary of Public Comments and Concerns Prior to Selecting the Current Preferred Alternative**

A summary of the comments received from private individuals are grouped into broad categories and are summarized below along with a response from the US-31 study team:

Two hundred fifty-nine (31%) opposed improving existing US-31. Most were opposed to widening US-31 through Grand Haven. Many were concerned about the amount of property acquisition required to implement the improvement and many were concerned about dividing the community.

*The proposed Preferred Alternative will involve improvements to existing US-31. It will be expanded to a six-lane boulevard in both Holland and Grand Haven. The expansion of existing US-31 in Grand Haven will primarily be on the median side and will involve property impacts at only a few intersections. Other than needed cross-street improvements, the majority of the improvements in both the Holland and Grand Haven areas will be done within the existing right-of-way.*

Two hundred nineteen (26%) supported improvements to existing US-31, Alternative A, P, or P1r.

*Alternative A, P, P1r did not meet all of the “Purpose and Need” elements and “local goal” criteria discussed in **Chapter 2**. These alternatives were also not supported by the Cities of Grand Haven and Ferrysburg.*

One hundred fifty-two (18%) supported a rural bypass for US-31.

*Support for rural bypass noted.*

One hundred thirty-four (16%) opposed improvements to US-31, which impact St. Patrick's Catholic Church in Grand Haven.

*The Preferred Alternative improvements to US-31 will not require the acquisition of any portion of St. Patrick's Catholic Church's property or access to it.*

One hundred twenty-five (15%) supported a freeway upgrade of existing US-31.

*The upgrade of existing US-31 to a freeway was not supported by the Cities of Holland, Grand Haven, Ferrysburg, and Holland Township. It also did not meet “Purpose and Need” of the study.*

One hundred eighteen (14%) opposed a rural bypass for US-31. Many were concerned with the amount of impacts to farmland and natural resources required to implement this alternative.

*Opposition for a rural bypass was noted.*

Eighty-three (10%) recommended the addition of another Grand River crossing.

*The Preferred Alternative includes a second Grand River crossing near 120th Avenue.*

Forty-eight (6%) recommended a fixed-span bridge to replace the current bascule bridge between Grand Haven and Ferrysburg.

*The selection of a fixed span bridge or a bascule bridge will be determined at the time of its design and in coordination with the US Coast Guard on its required height for vessels navigating the Grand River.*

Seventeen (2%) supported Transit Alternatives, such as rail, bus, car pooling, etc.

*The Preferred Alternative includes the provision of transit service. Bus and car pooling programs exist in the study area and are identified in the FEIS.*

Nine (1%) opposed Alternatives P and P1r, the “local Grand Haven bypass”.

*This alternative was eliminated because it failed to substantially meet “Purpose and Need” and it did not gain support of the City of Grand Haven, due to substantial social and environmental impacts.*

Eight (1%) asked that MDOT stop studying the US-31 traffic and safety problem and start implementing a solution.

*MDOT will monitor traffic operations and make Transportation System Management (TSM) improvements where feasible. Many TSM-type improvements have already been made by MDOT since the initiation of this study. These include:*

- *New or lengthened right and left turn bays where right-of-way permitted.*
- *Conversion of some direct left turn intersections to in-direct left turn intersections.*
- *Improved traffic signal controllers for better progression of traffic.*
- *Other intersection enhancements on US-31 and cross roads.*

### **C.3.3 Responses to Public Comments and Concerns**

#### **Traffic/Engineering**

Why is the traffic over the Grand River Bridge in Grand Haven 17,000 vehicles per day more than the traffic in Grand Haven? Where do the extra vehicles come from? Also, how reliable are these numbers? – written comment dated 12/8/98.

*East-west crossroads such as Jackson St. and Waverly Ave are high volume roads and provide access to US-31. Traffic turning from these roads is added to the existing traffic on US-31, which causes the increase. More traffic from M-104 is added to US-31 north of the bridge. These numbers were developed using actual traffic counts.*

#### **Opposition to a boulevard/freeway upgrade along existing US-31**

How do you assess the impact of physically dividing our community (the City of Grand Haven) in half? And why haven't you done a more thorough job of evaluating the secondary impacts? – written comment dated 12/8/98.

*The Preferred Alternative minimizes the number of road closures, and includes retaining the boulevard. The US-31 Land Use Study addressed secondary impacts in detail. There is a summary of this study included in **Chapter 4**.*

Why would you put a highway through our town (City of Grand Haven)? Why can't we keep our boulevard with its green areas? – written comment dated 12/31/98.

*The boulevard through the City of Grand Haven will remain. The Preferred Alternative includes phased-in improvements through the City of Grand Haven in order to provide an acceptable level of service at local intersections in the year 2020. Expansion (additional lanes) will occur in the median, in order to reduce the amount of property acquisitions that will be required and will occur only as traffic conditions dictate.*

Would it help to take out the grass in the middle of Beacon Boulevard, make that into a driving lane, rather than widening out, and destroy buildings? – written comment dated 1/6/99.

*Yes, the Preferred Alternative widens Beacon Boulevard to a six-lane boulevard through Grand Haven, with the extra lane primarily taken from the median side to avoid and minimize impacts to existing properties.*

How about Beechtree or some area around town, rather than widening Beacon Boulevard? – written comment, no date

*The Beechtree Connector is a local road project. Using Beechtree in lieu of US-31 would not solve the regional traffic issues and would not address "Purpose and Need".*

Is it necessary to accommodate through travelers by splitting our beautiful town in half? Why can't we be like so many other cities and simply have a bypass around us with an exit to Grand Haven for those who want to visit us? Why destroy our community (City of Grand Haven) and our homes? Leave Beacon Boulevard as it is and place a freeway that goes around the outskirts of the city. – written comments dated 1/4/99 and 1/6/99.

*The Preferred Alternative includes both a widened Beacon Boulevard and a new two-lane route that connects M-45 with M-104/I-96. The proposed modifications to Beacon Boulevard since the DEIS significantly reduced impacts within Grand Haven, however traffic projections show that additional capacity will eventually be needed to provide an acceptable Level-of-Service in 2020.*

We have a Middle School two blocks west of US-31 and have students from the east side walking across this highway to get to school. What will 8 lanes do to them? – written comment dated 1/11/99

*Additional lanes are primarily taken from the median. US-31 in Grand Haven is proposed for six lanes, not eight lanes. Pedestrians will be able to cross at signalized intersections using crosswalks.*

In the issue of agricultural land: it seems to me that farmers are selling to land developers all the time. Why not put the highway on agricultural land and allow for an orderly development of commercial, multiple residence, and single ownership along its corridor? - written comment, no date.

*The freeway portion of the Recommended Alternative is located partially on farmland. All of the governmental units within the study area have comprehensive land use plans and/or zoning ordinances. These local plans and ordinances can and will be used and systematically modified, if needed, to influence and guide development along the Recommended Alternative. The number of interchanges within rural areas was limited, to minimize the pressure for development in these areas.*

#### **Grand River Bridge between Grand Haven and Ferrysburg**

Why do we have a drawbridge in Grand Haven anyway? I have lived in this area my whole life and cannot recall ever seeing anything other than pleasure craft needing to have the bridge opened. –written comment dated 12/18/98

Supports replacing the existing US-31 bascule bridge with a fixed span bridge. – court reporter statement taken at the December 8 or 9, 1998 Public Hearing.

*The Grand River is a recognized navigable river by the US Coast Guard (USCG) from Lake Michigan upstream to approximately the confluence of the Bass River. As such, navigation is regulated by the USCG and maintenance of the channel overseen by the US Army Corps of Engineers (USACOE). Until the United States Congress modifies the Grand Rivers designation, no object over the river within the designated area can impede existing or future vessel traffic on the River. At present, tugboats and barges with cranes comprise the bulk of the vessels requiring bridge openings. Pleasure craft make up the remainder of the vessel traffic. Additional information concerning navigation related to this study can be found in **Chapter 4**.*

MDOT continues to explore expanding the current boulevard in Grand Haven as an option to the traffic congestion problem. Why enlarge the bottle when the neck (the drawbridge) remains the same size? How about widening the bridge that is the cause of the tie-up to begin with? Or build another bridge next to the one we have for all the truck traffic? Are you going to replace the drawbridge with a larger eight lane one? – written comments dated 12/21/98, 1/8/99, and 1/3/99

*The Preferred Alternative calls for a larger replacement structure immediately to the west of the existing structure. Both a bascule and fixed-span structure type are being considered. The replacement structure is proposed to have a 45-foot underclearance, which will allow many more boats to pass under than the current structure. The decision on whether to construct a fixed-span or bascule bridge will be made at the time of design and in coordination with the US Coast Guard.*

In the summer, our newly reconstructed bridge raises every half-hour for the big boats. Wouldn't it be better to go more to the East of town? We surely need another bridge over the river – why not at 144<sup>th</sup> Avenue? – written comment dated 1/22/99.

*The Recommended Alternative provides a second Grand River crossing near 120th Avenue. Alternatives P and P1r, which provided a Grand River crossing near 148th Avenue were eliminated due to lack of support for this route as a US-31 bypass and does not meet "Purpose and Need". This location could be used for a local bridge connecting Grand Haven and Spring Lake if desired by locals, but would be done outside of this study.*

How many of the problems are caused by tourism or pleasure boats causing the bridge to open? Is there a way to alleviate this maybe by allowing the bridge to open only ever 2 hours starting at 7:30 am? – written comment dated 1/17/99.

*The opening and closing of the current bascule bridge is limited to certain times of the day, as well as certain seasons. The opening schedules have been amended several times recently to further restrict openings during vehicular peak-hours (noon and evening) of the day. The schedule of openings is under the jurisdiction of the U.S. Coast Guard.*

#### **Support for a boulevard/freeway upgrade along existing US-31**

How about an elevated US-31 through Grand Haven? – written comments dated 12/2/98; 1/7/99; 1/18/99; 1/20/99.

Suggested upgrading existing US-31 to a freeway, with the portion through Grand Haven elevated. – court reported statement taken during the December 8 or 9, 1998 Public Hearing.

*An elevated freeway is cost prohibitive, eliminates access to Grand Haven to all but a couple of locations, and complicates the US-31/M-104 interchange. Further, this alternative did not meet "Purpose and Need".*

What is wrong with the present US-31 location as a boulevard/freeway? Isn't there any way to use what is already in place? When there is an already existing highway that could be made into the kind of expressway that is needed, why would it be better to "cut" an agricultural area such as Olive Township in

half? Why spend all the money creating a new highway and destroying the country when we could improve the existing one? – written comments dated 12/16/98, 1/21/99, 1/22/99, and 1/31/99

*The current Preferred Alternative does not include any roadway or bridge work in Olive Township.*

Opposed to the rural bypasses and supports upgrading existing US-31 (12 statements). - court reported statement taken during the December 8 or 9, 1998 Public Hearing.

*Alternative A did not meet the “Purpose and Need” and “Other Local Goals” discussed in **Chapter 2**. Alternative A is more costly than the Preferred Alternative.*

Traffic must be allowed to move non-stop through Grand Haven. Overpasses east and west are a necessity. Would overpasses also help Holland? - written comment, no date.

Suggested that instead of constructing additional lanes or a new highway, to simply close off many of the cross-street and driveway access points through Grand Haven as a cheaper alternative. – court reporter statement taken during December 8 or 9, 1998 Public Hearing.

*Overpasses would facilitate east-west movements in both urban areas, but they also would restrict and limit access to US-31, and require more property acquisitions at interchange locations. It was therefore recommended to forego a freeway upgrade of existing US-31 in favor of improving the existing boulevard. The Cities of Holland and Grand Haven support the improvements as proposed to the existing US-31 Boulevard.*

#### **M-104**

If any bypass or upgrade occurs what, if anything, will be done to handle the increased traffic flow on M-104? – written comment dated 12/2/98.

*The Preferred Alternative includes upgrades of M-104 between 124<sup>th</sup> Avenue and the I-96/US-31 Freeway Connection/M-104 interchange. The Preferred Alternative may reduce traffic on M-104.*

Might I suggest something? I would make the present M-104 into a one-way eastbound road and put a two lane westbound road on the abandoned Grand Trunk Railroad bed from Nunica to Spring Lake. – written comment dated 1/14/99.

*The proposal to utilize the abandoned RR bed was examined early on in the process, but eliminated from further consideration due to lack of support for the Local Grand Haven bypass and it did not meet “Purpose and Need”. The Preferred Alternative does include improvements to M-104 between 124<sup>th</sup> Avenue and the I-96/US-31 Freeway Connection/M-104 interchange. No capacity improvements are planned to M-104 in the Village of Spring Lake.*

#### **Social Impacts**

Our complex, Park Lane Apartments, where we live, will have over 56 families displaced. Are you paying us a relocation fee to find another place to live? Will a true fair market value of properties be offered? How and where do the affected property owners find land to rebuild in the city and if they can, will these properties fit their needs? Where are all of these displaced people going to live (in the City of Grand Haven) if Beacon Boulevard is widened? What about the hardships to <businesses and churches> them? - written comments dated 1/11/99 and 1/4/99.

*The Preferred Alternative eliminates impacts to Park Lane. This was achieved by widening existing US-31 on the median side, or inside, of the facility as opposed to the outside of the facility.*

*Property acquisition for this project will follow the regulations contained in the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act MDOT acquisition procedures. These procedures provide for relocation assistance and outline property owners’ rights and*

responsibilities. More information is provided in pamphlets entitled "Public Roads and Private Property" and "Your Rights and Benefits – When Displaced by a Transportation Project", which are available through MDOT.

A Conceptual Stage Relocation Plan has been prepared for this project. Regarding the availability of residential property, the plan states that there is "a sufficient supply of existing homes, new home construction, future planned development and apartment rentals in the county-wide area to absorb the displacements as projected under any of the proposed Practical Alternatives." Regarding commercial properties, the plan states, "The displacement of any business for an alignment chosen will not have any major, lasting economic or generally disruptive effect on the community or county. The displaced business, as is usually the case, will probably remain in business by acquiring a replacement site nearby." Regarding public institutions and churches, the plan states, "There is sufficient land for development and also many existing buildings on the market wherein any public institution would be able to find a development site or an existing facility for relocation." [Reference: "Relocation Plan – Conceptual Stage," prepared by the Real Estate Division of the Michigan Department of Transportation.]

Significant refinements to the Preferred Alternative were made after the DEIS. These refinements reduced the impacts to property owners and provided additional access for local roads. For instance, overpasses were added along the proposed route to improve land access and emergency services access. Further, the alignment was modified to avoid businesses. For property owners who are not displaced, construction mitigation plans will assure that impacts are minimal.

We own and operate Plover Vale Farm just east of Zeeland. The Recommended Alternative would place a bypass directly over our farm. Businesses can put up new buildings in new locations, but the land cannot be moved and without the land our business and only means of providing for our families is gone! Who is going to give us a new career or train us for another occupation? – written comment dated 1/20/99.

*The Preferred Alternative has changed since the DEIS. There are no impacts to the farm.*

I'm concerned about schools. How many are situated along the proposed F/J1 route? In addition, what would be the impact on east and west traffic in the township? – written comment dated 1/22/99.

*There are no school properties directly affected by the Preferred Alternative. There are a few schools nearby.*

### **Environmental Impacts**

Who owns wetland mitigation sites once the man-made wetlands are constructed? How are they protected and kept as functional parts of the watershed? On page 6-34f, mitigation cost is estimated at \$50,000 per acre. How many years of site management, if any, is included in this estimate? What happens if a constructed wetland that appears to be working 2 years after construction functionally fails before five years have gone by? What would the cost estimate be if the management period were extended to 15 years? Looking at the sprawl pattern maps (DEIS Fig. 5.2-3.3) it appears that Alternative F would result in the wetlands areas being bordered by intensive residential development. How have these impacts been incorporated into the assessment of water quality in the Pigeon River basin? Also, is it possible to construct a reed bed wastewater treatment facility on proposed Pigeon River mitigation site #4, near 96th Avenue? – 12/18/98.

*Wetland mitigation sites can be privately or publicly owned, but are preferred to be owned and managed by a public entity, such as MDOT, MDNR, MDEQ, County or City. Properties are included within MDOT's right-of-way, county or city owned property or, are protected with a conservation easement. With the proposed Macatawa, Pigeon and Grand River Greenway Projects of the Ottawa County Parks Department, and the Macatawa and Pigeon Watershed*

*projects, ample opportunities exist to jointly work together to meet all of these parties needs and goals in preserving, restoring and adding new natural habits.*

*MDOT monitors the wetlands using the MDEQ Technical Guidance for Wetland Mitigation, dated September 9, 2003 for typically a period of 5 years. If the mitigation is failing, a mid-course correction or corrective action is implemented to ensure the success of the mitigation site. Costs of management of the wetlands are performed by MDOT.*

*Alternative F was not carried through as a Practical Alternative into the FEIS process and as such, there are no impacts to the Pigeon River..*

*The proposed Pigeon River mitigation Site #4 was not selected as one of the two mitigation sites carried into the FEIS process and therefore this suggestion was not evaluated. No evaluation of the feasibility of constructing a reed bed wastewater treatment facility was conducted as part of this study.*

The MDEQ said that the Pigeon River wetland system "should be avoided". Where is the information that led them to say this, in the DEIS or elsewhere? – 12/8/98.

*They are simply referring to it being a well preserved and undisturbed natural area that they would prefer seen avoided if possible. Impacts to this area have been avoided, with the Preferred Alternative by spanning the river.*

Noise impacts have been studied, but has anyone looked at the impact of noise on the frog population? Normally, the frogs all go quiet when vehicles pass. – 12/18/98.

*Noise impacts to the frog population were not considered as part of this study.*

Concerned with the rural bypasses and their impacts on the environment and wildlife. – court reporter statement taken at December 8 or 9, 1998 Public Hearing.

*All efforts were taken during the development of the FEIS to avoid, minimize and mitigate impacts to wildlife to the extent possible.*

In **Chapters 4 and 6**, the DEIS discussed conformity with the NAAQS and the CAAA in regards to air quality. **Chapter 6** of the DEIS described only carbon monoxide analysis. Aren't there six basic components that have to be checked, including lead, volatile organic compounds, sulfur dioxide, oxides of nitrogen, and particulate matter, as well as carbon monoxide? Why are these not mentioned in the DEIS?

*In accordance with FHWA and MDOT guidelines, the analytical element of the DEIS air quality analysis focuses on CO emissions - the most prevalent air pollutant in motor vehicle exhaust. However, because the project is located in a "maintenance /attainment" area for the pollutant ozone, compliance with the State Implementation Plan (SIP) is also addressed - this in accordance with the Transportation Conformity Rule of the Federal Clean Air Act. By demonstrating that the project is included in the Transportation Plan (TP) / Transportation Improvement Program (TIP), the potential effects on ozone, nitrogen oxides and volatile organic compounds are properly addressed. Lead and sulfur dioxide are not considered significant components of motor vehicle exhaust. The project area is in attainment of the NAAQS for particulate matter and therefore, an analysis of this pollutant is considered unnecessary.*

Air quality seems to be treated only insofar as human receptors are impacted. What about crop damage? Michael Renner, in his research paper entitled, "Rethinking the Role of the Automobile", Worldwatch Paper 84, published by the World Watch Institute, Washington DC, 1998, p.36, states that emissions from cars cause crop losses of \$1.9 to \$4.5 billion for just four cash crops in the U.S. Shouldn't we be adding estimated crop damage costs to the agricultural impacts that a rural freeway is sure to impose? – 12/18/98.

*The Clean Air Act, the Transportation Conformity Rule and the NAAQS are designed to protect both the human and natural environments. Therefore, compliance with these regulations helps to ensure that impacts to agricultural crops are also minimized.*

On p.4-20 of the DEIS it says, "Transportation projects can typically provide positive or negative benefits to air quality depending on the congestion relief provided". What is a "negative benefit"? Congestion relief for how long? The period of the study (2020)? – 12/8/98.

*It is likely that the reference to a "negative benefit" was a mistake and was likely intended to read a "negative impact". The Air Quality section of the FEIS (**Chapter 4**) has been updated and does not include a reference to a negative benefit. The air modeling uses the highest expected CO concentrations predicted for the year 2020. This project will help to improve air quality conditions by providing additional capacity to the roadway network and reducing periods of stop-and-go-traffic - a condition that causes the generation of "excess" emissions.*

I know people don't want to lose farmland, but how much is actually farmed? – 1/4/99.

*Farmland is classified by various types. There are 46,000 acres of land classified as farmland in the study area. There are 4,175 farms in Allegan, Kent, Muskegon and Ottawa Counties on 667,129 acres.*

Where is all the wildlife by us going to go? – 12/8/98.

*Ottawa County is expected to have approximately 80% of its land in open space by the year 2030. Wildlife will relocate to these areas where there are suitable habitats.*

The bypass problem is a problem that is impacting wetlands and agricultural land, so why not solve it by elevating the expressway over the wetlands or bayous? By elevating over other sensitive places most agriculture areas would be undisturbed and the present road system undisturbed. – 1/12/99.

*The Preferred Alternative spans the wetlands adjacent to Little Robinson Creek and the Grand River, in order to avoid or minimize impacts. The number of piers will be minimized to limit impacts to wetlands as much as possible. In addition, storm water draining off these structures will be collected and sediments such as salt will be allowed to settle out before the water flows back into these river systems.*

### **Transit**

Given the concerns over right-of-way acquisitions, displacements, and environmental impacts, why was the transit option (both bus and train) not studied further? What about high-speed railway transportation along the west coast of the lake? Why isn't it possible to "fold in" alternative transportation to a lower impact and lower cost alternative? - written comments dated 12/6/98, 12/8/98, and 1/7/99.

Suggested using the existing rail line west of US-31 for a mass transit solution instead of constructing widened or new roadways. Supports Alternative A and further investigation of a transit option utilizing the existing railroad west of US-31. Suggests that Transit option be given more study as a long-term solution. – court reporter statements taken during December 8 or 9, 1998 Public Hearing.

*For a Transit Alternative to independently satisfy the "Purpose and Need", it must eliminate the need for additional through lanes on US-31 in the two urban areas.*

*MDOT eliminated further study of a stand alone Transit Alternative based on:*

- *Current ridership being less than 2% of what is needed to eliminate the need for an additional through lane in Holland, and less than 3% in Grand Haven.*

- *The absence of existing or proposed fixed route line-haul service providers throughout the entire study area.*
- *The overall high cost of implementing, funding, a transit fleet of that size (larger than Grand Rapids transit system).*

*MDOT does however acknowledge that several transit components could be implemented with or without the Preferred Alternative, such as:*

- *Construction of expanded and/or additional park & ride lots, including the possible addition of dedicated transit stops at one or more of these to improve transit access.*
- *Possible future intermodal facilities (Holland/Holland Township, Grand Haven/Ferrysburg/Spring Lake, and Muskegon areas).*
- *Expansion of the area's current ride-share programs.*
- *Possible addition of transit pull-out lanes on cross-streets near US-31 in the urban areas of Holland/ Holland Township and Grand Haven, where fixed route transit service routes presently exist or are proposed.*
- *Increased use of transit for special events or peak shopping times, such as Tulip Time, Coast Guard Festival, Christmas shopping rush, etc.*

See **Chapter 3** for further discussions on Transit.

#### **Other**

How many more years are we going to toss this US-31 plan around because it doesn't suit every single person involved? Please get on with it! – written comment dated 11/19/98

Suggested a decision just be made and that MDOT just move on with an improvement. – court reporter statement taken during December 8 or 9, 1998 Public Hearing.

*Comments noted. The construction of the Preferred Alternative is based on approval of the FEIS and dependent on funding availability. The goal would be to have it fully implemented no later than the design year, which is 2020.*

Last weekend I reviewed the drawings of Alternative P1r and noticed that the aerial photography was at least 8 years old. Our facility (Hortech, Inc.) has been fully developed since this time and none of the structures show up on your map. What does this mean in light of statements and financial figures that relate to the impact of this and other bypass proposals? – written comment dated 12/14/98.

*In the time since the DEIS, aerals from 1999 have been obtained for much of the study area. Field checks for accuracy have been made throughout the study area, and changes since that time have been incorporated in the study. Statements and financial figures in the FEIS are based on information available at the time of the printing.*

Who would pay for the cost of maintaining both old US-31 and the bypass, including snow removal, maintenance, additional mileage to use the bypass, and additional pollution? – written comment dated 12/9/98.

*The Michigan Department of Transportation is responsible for maintenance and related items as long as the roads remain a Michigan trunk line. Traffic flow will be greatly improved by the Preferred Alternative; therefore, air quality is expected to improve.*

Secondary impacts of a rural bypass are reflected in the maps of residential sprawl (DEIS, p.3-9). These additional VMT do not appear to be factored into the traffic counts or the emission assessments. Are they? How is generated traffic assessed by MDOT? – written comment dated 12/18/98.

*Future traffic volumes and resulting Vehicle Miles of Travel (VMT) are used in the FEIS for air quality and are based on future development patterns and other factors.*

Alternative P/P1r appears to have the greatest impact on traffic volumes at the US-31/M-104 interchange. Is this due to the availability of another option to get from Grand Haven to I-96/Spring Lake? Also, with any of the alternatives, what impact would reducing the size of the facility (from 4 lanes to 2 lanes, for example) have upon traffic diversion? – written comment dated 12/8/98.

*Traffic volumes at the existing US-31 Grand River crossing are reduced more in Grand Haven with these alternatives because the proposed second crossing of the Grand River is closer to the existing crossing and urban area, than the other alternatives. However P/P1r does not meet the purpose of and need for the project and does not address traffic issues in the study area as the Preferred Alternative does. MDOT and the City of Grand Haven have modified the Preferred Alternative within the city to minimize impacts.*

Why would someone want to use Alternative P/P1r? It would not save any time, nor would it improve overall congestion in Grand Haven. – written comment dated 12/9/98.

Opposed to the Local Grand Haven Bypass (4), supports an elevated freeway through Grand Haven (1), and supports a second crossing of the Grand River at 120<sup>th</sup> Avenue (1). The Spring Lake Public School superintendent opposed to the local Grand Haven Bypass, Segment B2a, which goes through their almost new high school. - court reporter statements received at December 8 and/or 9, 1998 Public Hearing.

*Alternatives P and P1r were two of many alternatives examined. They were eliminated from further consideration after the release of the DEIS due to the lack of support they received, opposition to them that was received, and because they did not meet "Purpose and Need".*

Other cities have worked these projects through, but I think someone isn't looking at this "big picture". How much have these planners looked at this elsewhere for examples? – written comment, no date.

*MDOT evaluated over twenty alternatives for this study. This was a very complex project due to the size and number of municipalities and townships that the facility traverses. Similar studies from around the country are constantly being reviewed by MDOT to seek other examples on how best to handle complex issues on this type of study. The Preferred Alternative addresses both existing route improvements as well as growth occurring in central Ottawa County.*

Why does everything have to be "limited-access freeway"? Grand Haven is just fine the way it is! – written comment dated 1/8/99.

*The Preferred Alternative retains the boulevard through both the Holland and Grand Haven areas. Limited access maintains the capacity of the roadway by not allowing driveways or development along the route, and provides a limited access freeway only for the US-31 Freeway Connection.*

Why has not a corridor between Holland and Zeeland been studied? Why east of Zeeland? – written comment dated 12/9/98.

*The Illustrative Alternatives G and H discussed in the DEIS involved a freeway from I-196 between Holland and Zeeland north to I-96 at Nunica. The area between Holland and Zeeland has been urbanized, and such a freeway would require the relocation of many more homes and businesses, and impacts to the natural environment than other alternatives, therefore they were eliminated from further consideration.*

Would a new fixed span bridge, and maybe changes or limiting crossroads in the City of Grand Haven buy some time? – written comment dated 1/19/99.

*The Preferred Alternative includes a phased approach for improvements in Grand Haven. Improvements include widening to six lanes within the median between Washington Street and Jackson Street. This will only be done if warranted following analysis of the impacts of the bypass.*

If Ludington, Pentwater, Hart, Shelby, Montague, Whitehall, and Muskegon, have been by-passed (or in the case of Muskegon, have a limited access highway which was once a by-pass), then why wouldn't that be a good idea for the tri-cities area where lakes and rivers funnel traffic into restrictive urban areas? – written comment dated 11/9/98.

*The Preferred Alternative includes a new two-lane roadway connecting M-45 to M-104/I-96 west of and parallel to 120<sup>th</sup> Avenue.*

Have any studies or estimates on lives saved or additional lives lost been done from one alternative to another? Also, any studies on time & fuel savings for each route? – written comment dated 11/15/98.

*Crash rates along portions of existing US-31 exceed the statewide average. The Preferred Alternative was designed to improve safety by improving the level of service (LOS) at specific intersections. The FEIS did not specifically project how many lives would be saved.*

*The specific estimate of time and fuel savings was not completed for each alternative. Travel time along the new roadway portion of the Preferred Alternative will be faster than existing US-31, because it will be a limited access roadway.*

Why at this time are we concentrating on moving traffic off US-31 and onto other roads? We should be looking at modifying US-31 to handle the traffic in a more efficient manner. The current options for US-31 appear to be too costly. Why not convert the current road structure into a freeway with a system of overpasses, etc.? – written comment dated 11/24/98.

*Alternative A (freeway on existing) was considered but was dismissed because of the social impacts within the urbanized Holland and Grand Haven areas. In addition, Alternative A would be more costly to build.*

If you aren't going to be adding any additional lanes to US-31 but are only diverting about nine percent of the traffic, how is traffic supposed to move along US-31? – written comment dated 12/9/98.

*The Preferred Alternative includes the addition of a third lane in each direction through Holland, Holland Township and Grand Haven. This will provide enough additional capacity for the projected traffic volumes of 2020 to provide an acceptable level-of-service.*

## **C.4 COMMENTS AND RESPONSES TO FEIS**



IN REPLY REFER TO:

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

East Lansing Field Office (ES)  
2651 Coolidge Road, Suite 101  
East Lansing, Michigan 48823-6316

January 15, 2010

Mr. David T. Williams  
Environmental Program Manager  
Federal Highway Administration  
315 West Allegan Street, Room 201  
Lansing, Michigan 48933

Re: Request for NEPA/404 Concurrence on the Second Decision Point: Alternatives Carried Forward for the US-31 from I-196 to I-96 Project, Allegan, Ottawa, and Muskegon Counties, Michigan

Dear Mr. Williams:

This responds to your December 15, 2009, letter, requesting our concurrence on the second NEPA/404 decision point for the above referenced project. We have reviewed the draft Final Environmental Impact Statement (FEIS), which accompanied your letter, and offer the following comments in accordance with the National Environmental Policy Act of 1969, as amended.

We previously reviewed the Draft Environmental Impact Statement (DEIS) and provided comments in correspondence, dated January 15, 1999, from the U.S. Department of Interior. At that time, we were unable to concur with the alternatives carried forward because the DEIS lacked an acceptable suite of alternatives that minimized wetland impacts. The wetland impacts associated with the alternatives considered in the DEIS ranged from 47.55 to 89.96 acres.

Since the time of the DEIS, the Michigan Department of Transportation (MDOT) has revised the practical alternatives and developed a new alternative, F-1a, which is a subset of the practical alternatives contained in the DEIS. The F-1a alternative would impact 3.04 acres of wetland.

In other comments we provided to the Federal Highway Administration (FHWA) on October 27, 1994, regarding the US-31 project, we expressed concerns about impacts to forested wetlands that support migratory birds and recommended no net loss of habitat value. Because the new F-1a alternative would still require construction of a new roadway and a new crossing of Grand River, we continue to have concerns about impacts to the habitat value of the wetlands and potential adverse impacts to migratory birds from

habitat fragmentation and highway noise. The draft FEIS contains predicted noise levels from the new M-231 alignment, and we recommend you consider mitigation for the indirect effects of these noise levels as you develop a more detailed mitigation plan. Biologists from this office are available to assist you in assessing the effects to habitat value and migratory birds.

Although concerns about potential effects to migratory birds remain, we recognize that the MDOT has developed new alternatives that substantially reduce direct wetland impacts from almost 90 acres down to approximately 3 acres. Based upon this, the FEIS adequately considers alternatives that minimize wetland impacts. Pursuant to the March 1994 FHWA NEPA/404 Merging Process, we agree to the second decision point and concur with the Alternatives Carried Forward.

We appreciate the opportunity to provide these comments. If you have any questions, please contact Barbara Hosler of this office at 517/351-6326 or the above address.

Sincerely,



for

Craig A. Czarnecki  
Field Supervisor

cc: MDOT, Project Planning Division, Lansing, MI (Attn: Mike O'Malley) ✓  
USEPA, NEPA Implementation Section (E-19), Chicago, IL (Attn: Sherry Kamke)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JAN 14 2010

REPLY TO THE ATTENTION OF:  
E-19J

Mr. David T. Williams  
Environmental Program Manager  
Federal Highway Administration – Michigan Division  
315 Allegan Street, Room 201  
Lansing, MI 48933

RE: Concurrence Points 1 & 2 - US-31 from I-196 to I-96 in Ottawa County, MI

Dear Mr. Williams:

The U.S. Environmental Protection Agency (EPA) has received your December 15, 2009 request to provide concurrence on the Purpose and Need and Alternatives Carried Forward for Detailed Study for the US-31 Project from I-196 to I-96 in Ottawa County, Michigan.

The last written documentation we have on the project was our comments on the Draft Environmental Impact Statement (EIS). When we issued our January 21, 1999 letter, we had substantial concerns about the project and its impacts on aquatic resources, especially wetlands. Much has happened on the project since that time. We now understand that the Federal Highway Administration and Michigan Department of Transportation are looking at a project that is substantially smaller in scope. This change in scope and focused minimization efforts have reduced wetland impacts from 90 acres to just over 3 acres. With the changes made on the project, we agree that it is appropriate to revisit EPA's position on Purpose and Need and Alternatives.

Based on the information provided as enclosures to the December 15, 2009 letter, we concur with the project's purpose and need (Concurrence Point #1) and the Alternatives Carried Forward for Detailed Study (Concurrence Point #2).

Thank you for the opportunity to review this information. If you have any questions, please contact Sherry Kamke, of my staff, at either [kamke.sherry@epa.gov](mailto:kamke.sherry@epa.gov) or (312) 353-5794.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kenneth A. Westlake", is written over a faint circular stamp.

Kenneth A. Westlake  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

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## **APPENDIX D: CONCEPTUAL STAGE RELOCATION PLAN**

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Michigan Department of Transportation  
Real Estate Division  
Conceptual Stage Relocation Plan  
US-31 from M-45 to M-104  
Control Section 70013, JN 339550

March 10, 2008

GENERAL AREA and PROJECT INFORMATION

The Michigan Department of Transportation (MDOT) is proposing a trunkline project in Ottawa County which runs from M-45 in Allendale, Michigan to M-104 in Grand Haven, Michigan. MDOT previously selected an alternative that included a new off-alignment freeway between I-96 and I-196, and existing route improvements in Holland and Grand Haven. Based on the current economic climate in Michigan, it became clear completion of the entire project was not economically feasible. In 2005, MDOT held a series of meetings with local agencies located in the corridor influence area, as well as the Holland and Muskegon Metropolitan Planning Organizations. The meetings were held to review local and state priorities and needs in the corridor. As a result of the meetings, a modified preferred alternative was selected, which includes constructing a new route between M-45 and I-96/M-104 just west of 120<sup>th</sup> Avenue, including a new river crossing and improvements to the I-96/M-104/112<sup>th</sup> Avenue interchange area.

The new route will initially be constructed as a 2-lane highway with property acquired as limited access right-of-way for future expansion to a 4-lane freeway. The project also includes improving strategic segments of US-31 in Grand Haven from south of the Washington Street intersection, north to the Jackson Street intersection vicinity; and from Lakewood Boulevard north to the Quincy Street vicinity in the Holland area. Improvements include adding through lanes and intersection modification, primarily within the existing right-of-way.

DISPLACEMENTS

Residential:	51
Business:	9
Farm:	6
Non-Profit:	0

DISPLACEMENT EFFECTS AND ANALYSIS

Acquisition of property for this project will allow for an orderly and timely relocation of all eligible displaced residents, businesses, farms and non-profit organizations (community facilities). The acquiring agency will ensure the availability of a sufficient number of replacement properties in the local area for all eligible displacees.

Residential: The project may cause the displacement of approximately 51 residential units. A study of the housing market in the project area indicates a sufficient number of replacement homes and rentals will be available throughout the relocation process. It is anticipated that the local residential real estate market will have the capacity to absorb the residential displacements impacted by this project.

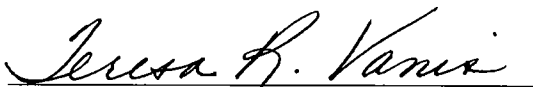
Business: The project may cause the displacement of approximately 9 businesses. A review of the local commercial real estate market indicates there are a sufficient number of replacement sites available to relocate eligible displaced businesses. Displacement of these businesses is not expected to have a major economic or otherwise generally disruptive effect on the community impacted by this project.

Farms: The project may cause the displacement of approximately 6 farms. A review of the market for available agricultural properties indicates a sufficient supply of farm properties to which eligible owners may be relocated.

### ASSURANCES

The acquiring agency will offer assistance to all eligible residents, businesses, farms and non-profit organizations impacted by the project, including persons requiring special services and assistance. The agency's relocation program will provide such services in accordance with Act 31, Michigan P.A. 1970; Act 227, Michigan P.A. 1972; Act 87, Michigan P.A. 1980, as amended, and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), as amended. The acquiring agency's relocation program is realistic and will provide for the orderly, timely, and efficient relocation of all eligible displaced persons in compliance with state and federal guidelines.

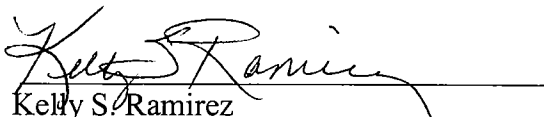
Prepared by:



Teresa R. Vanis  
Local Agency Coordinator

Date: 3/10/08

Approved by:



Kelly S. Ramirez  
Project Delivery Specialist

Date: 3/10/08

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## **APPENDIX E: METHODOLOGY FOR ENVIRONMENTAL JUSTICE**

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The Environmental Justice methodology that was used to conduct an Environmental Justice analysis of the Preferred Alternative followed MDOT and FHWA guidelines (US DOT Order 6640.23). That methodology has several steps that need to be followed along with a series of questions that need to be asked and answered in order to determine if there will be disproportionately high and adverse effects on minority populations groups within the Preferred Alternative.

- Step One:** Determine if a minority population group or low income population group is present within the Preferred Alternative.
- Step Two:** Determine whether project impacts associated with the identified low-income and minority populations are disproportionately high and adverse.
- Step Three:** Propose measures that will avoid, minimize, and/or mitigate disproportionately high and adverse impacts and provide offsetting benefits and opportunities to enhance communities, neighborhoods and individuals affected by the proposed project.
- Step Four:** If after further mitigation, enhancements, and off-setting benefits to the affected populations, there remains a high disproportionate adverse impact to minority populations or low income populations then the following questions must be considered:
- Are there further mitigation measures that could be implemented to avoid or reduce the adverse effect? If further mitigation measures exist, then those measures must be implemented unless they are “not practicable”.
  - Are there other additional alternatives to the proposed action that would avoid or reduce the impact to low income or minority populations? If such as alternatives exists, and it is “practicable”, then that alternative must be selected. If further mitigation or alternatives that avoid the impact are judged to be not practicable that conclusion must be documented, supported by evidence, and included in the NEPA document.
  - Considering the overall public interest is there a substantial need for the project?
  - Will alternatives that would still satisfy the need for the project and have less impact on the protected populations have other impacts that are more severe than the proposed action, or have increased the costs of extraordinary magnitude.
- Step Five:** Include all findings, determinations, or demonstrations in the environmental document prepared for the project.

Impacts of a No-Build Alternative: No impacts to Environmental Justice communities are expected for the No-Build Alternative.

Impacts of a Preferred Alternative: The Preferred Alternative will include minor improvements along the existing US-31 in Holland Township and the City of Grand Haven, and a new alignment bypass located in Robinson Township and Crockery Township. The small minority population in the study area is dispersed and no concentration of minorities groups will be disproportionately impacted by the Preferred Alternative. Although there are no disproportionate impacts to minority or low-income groups within the study area, these groups are impacted by the Preferred Alternative as part of the overall population.

---

1 **APPENDIX F: US-31 DEIS RE-EVALUATION**

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U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Michigan Division

315 W. Allegan, Room 201  
Lansing, Michigan 48933

March 16, 2009

Mr. David Wresinski, Administrator  
Project Planning Division (B340)  
Michigan Department of Transportation  
Lansing, Michigan

Dear Mr. Wresinski:

Re-evaluation of the Draft Environmental Impact Statement (DEIS) for  
US-31 Holland to Grand Haven, Ottawa County, Michigan

Enclosed you will find the approved Re-evaluation, signed by Mr. Steele, for the above referenced project.

FHWA anticipates that this will be included in the Final Environmental Impact Statement as an appendix and referenced in the document at the appropriate location.

If you have any question, please feel free to call me at 517/702-1847.

Sincerely,

Ruth E. Hepfer  
Area Engineer

For: James J. Steele  
Division Administrator

Enclosure

cc: David Calabrese, FHWA  
Dave Williams, FHWA  
Dennis Kent, MDOT Grand Region  
Mike O'Malley, MDOT

Profile No. P-24208

**MOVING THE  
AMERICAN  
ECONOMY**

**RE-EVALUATION OF  
THE US-31 HOLLAND TO GRAND HAVEN  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
OTTAWA COUNTY, MICHIGAN**

The Michigan Department of Transportation (MDOT) re-evaluated the US-31 Holland to Grand Haven Draft Environmental Impact Statement (DEIS) per the Code of Federal Regulations (see 23 CFR 771.129)<sup>1</sup> MDOT has determined that a supplemental EIS is not warranted as the analysis for the DEIS remains valid, and the evaluation of alternatives and impacts has kept pace with the regulatory changes.

The following discussion addresses each criterion that must be evaluated before a determination can be made on this project.

***Has an acceptable Final Environmental Statement (FEIS) been submitted to the Federal Highway Administration (FHWA) within three years from the date that the DEIS was approved and circulated?***

No, an acceptable FEIS was not submitted to FHWA within three years since October, 23, 1998 (the date that the DEIS was approved and circulated). The delay resulted from the need to address impacts and mitigation associated with the development of an initial Preferred Alternative. It was further delayed by the inability to fund the project.

The project history is as follows:

- |                  |  |
|------------------|--|
| <b>1993</b>      | MDOT began the NEPA process for the Holland to Grand Haven (I-196 to I-96) segment of the US-31 corridor.  |
| <b>1998/2000</b> | The DEIS was released in 1998 without a Preferred Alternate.   |
| <b>2002/2003</b> | At the request of EPA and local officials, MDOT initiated a land use study with Michigan State University to help quantify indirect impacts on land use from Alternative F/J-1. The study results indicated only minor changes in the type and location of developed land as a result of Alternative F/J-1, which was initially identified as the proposed Preferred Alternative.                              |
| <b>2004/2005</b> | MDOT determined that Alternative F/J-1 needed to be modified due to anticipated economic, social and environmental impacts. MDOT proceeded to modify Alternative F/J-1 to reduce impacts while still maintaining the Purpose and Need. Segments of Alternative F/J-1 were identified by MDOT, and local officials, which met the project's purpose and need, within the current financial resources available. |

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<sup>1</sup> Per 23 CFR 771.129: A re-evaluation of the DEIS shall be prepared in cooperation with FHWA if an acceptable FEIS is not submitted to the FHWA within 3 years from the date of the DEIS circulation. The purpose of the reevaluation is to determine whether or not a supplement to the DEIS or a new DEIS is needed.

- 2006 MDOT identified the current Preferred Alternative (F-1a/Figure 3.4-1). The Preferred Alternative includes: a new two-lane roadway located primarily within the F/J-1 alignment, previously identified in the DEIS, between M-45 (Lake Michigan Drive) and the I-96/M-104/112 Avenue interchange area, including a new Grand River crossing, and improvements to key congested segments of existing US-31 in the Grand Haven and the Holland area.
- Nov. 2006 The Preferred Alternative (F-1a) was presented formally at a Public Meeting in November, 2006.
- 2007/2008 In 2007, Alternative F-1a was added to the approved 2035 Long Range Transportation Plans in the two affected Metropolitan Planning Organizations (MPOs). The design phase was also added to the MPO Transportation Improvement Programs (TIPs) in 2008. The preparation of the FEIS was underway and should be completed in 2009

***Have there been any substantial changes to the project's scope or proposed action that would require a Supplemental Environmental Impact Statement?***

No, the DEIS identified Practical Alternatives, but did not identify a Preferred Alternative. Since the DEIS, a Preferred Alternative (F-1a) has been developed. It is within the scope of the DEIS Practical Alternatives, but has a more confined footprint with reduced social, economic and environmental impacts. The FEIS will be completed based on the Alternative F-1a as described herein. With the alignment of the Preferred Alternative established, updates to traffic, noise and air quality analysis will be completed as part of the FEIS. The information contained in the FEIS is current and complies with existing federal and state regulations.

***Does the project still meet the originally identified purpose and need?***

Yes, the Preferred Alternative (F-1a) still meets the Purpose and Need for the proposed action from the DEIS. No changes to the Purpose and Need for the project are proposed.

***Have activities to advance this project occurred since the DEIS was approved and distributed?***

Yes, activities to advance this project have occurred since the approval of the DEIS and include the following:

1. A Preferred Alternative was selected that will be analyzed in the FEIS document.
2. The ongoing refinements to the Preferred Alternative are being developed in consultation with local officials.

3. An analysis of land use impacts was completed by Michigan State University, which addressed local, state and federal agency concerns over indirect and cumulative impacts of the proposed project.
4. The air quality analysis has been updated per changes in the federal regulations.
5. A Public Meeting was held in November 2006 to present the modified Preferred Alternative (F-1a).
6. An Indiana Bat Survey, in coordination with the US Fish and Wildlife Service, based on the recently expanded range of this species.
7. An above Ground Historic Resources Survey was completed along with additional tribal coordination efforts.
8. MDOT updated information related to wetland identification, delineation and mitigation, and addressed United States Coast Guard (USCG) and Army Corps of Engineers (USACE) bridge height requirements.
9. The project was added to the Holland and Muskegon MPO Long Range Transportation Plans in 2007, including determining Regional Conformity for Air Quality.
10. MDOT amended the MPO TIPs and initiated limited preliminary engineering activities for the bridge over the Grand River as needed to complete the FEIS.
11. Additional, stakeholder, public involvement and resource agency coordination has continued since the approval of the DEIS.

*Have there been any changes in laws or regulations (federal, state, or local) occurring in which protected resources are affected by the project?*

Yes, the following changes since the DEIS are being addressed in the FEIS:

- Since the DEIS was signed, the US EPA lowered the ozone standard and in 2004; Ottawa County was found to be in attainment for all pollutants, except Ozone, for both the 1-hour and 8-hour standard. The US EPA revoked the 1-hour standard for Ozone in 2005. In 2007, Ottawa County was re-designated to Attainment/Maintenance for Ozone. The Ozone level is addressed through the MPO regional conformity process and the project did not affect the regional conformity determination.
- Since the 2000 Census, the project is now within two MPO boundaries. The Preferred Alternative has been amended into the MPO Long Range Transportation Plans, and the regional air quality conformity determination was not negatively impacted.
- Since the DEIS, MDOT has coordinated with Tribes on three occasions. MDOT coordinated with the Tribal Historic Preservation Officer (THPO) from the Pokagon Band of Potawatomi Indians along with the other potentially impacted tribes.

- Since the range of the Indiana Bat was expanded to include the project area by the US Fish and Wildlife Service. As a result, additional analysis of the impacts of the project on this species will be included in the FEIS.

### *Conclusion*

A Supplemental EIS is not warranted as the analysis for the DEIS Practical Alternatives remains valid for a Preferred Alternative with a reduced footprint. The analysis has kept pace with the regulatory changes which will be addressed in the FEIS.

### *Recommendation*

Based on the proceeding analyses and conclusions, there are no significant changes that would warrant preparation of a Supplemental EIS. MDOT is ready to proceed with the FEIS and is requesting FHWA's concurrence with this finding.

Michigan Department of Transportation:

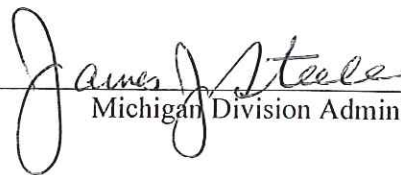


Project Planning Division Administrator

3/12/09

Date

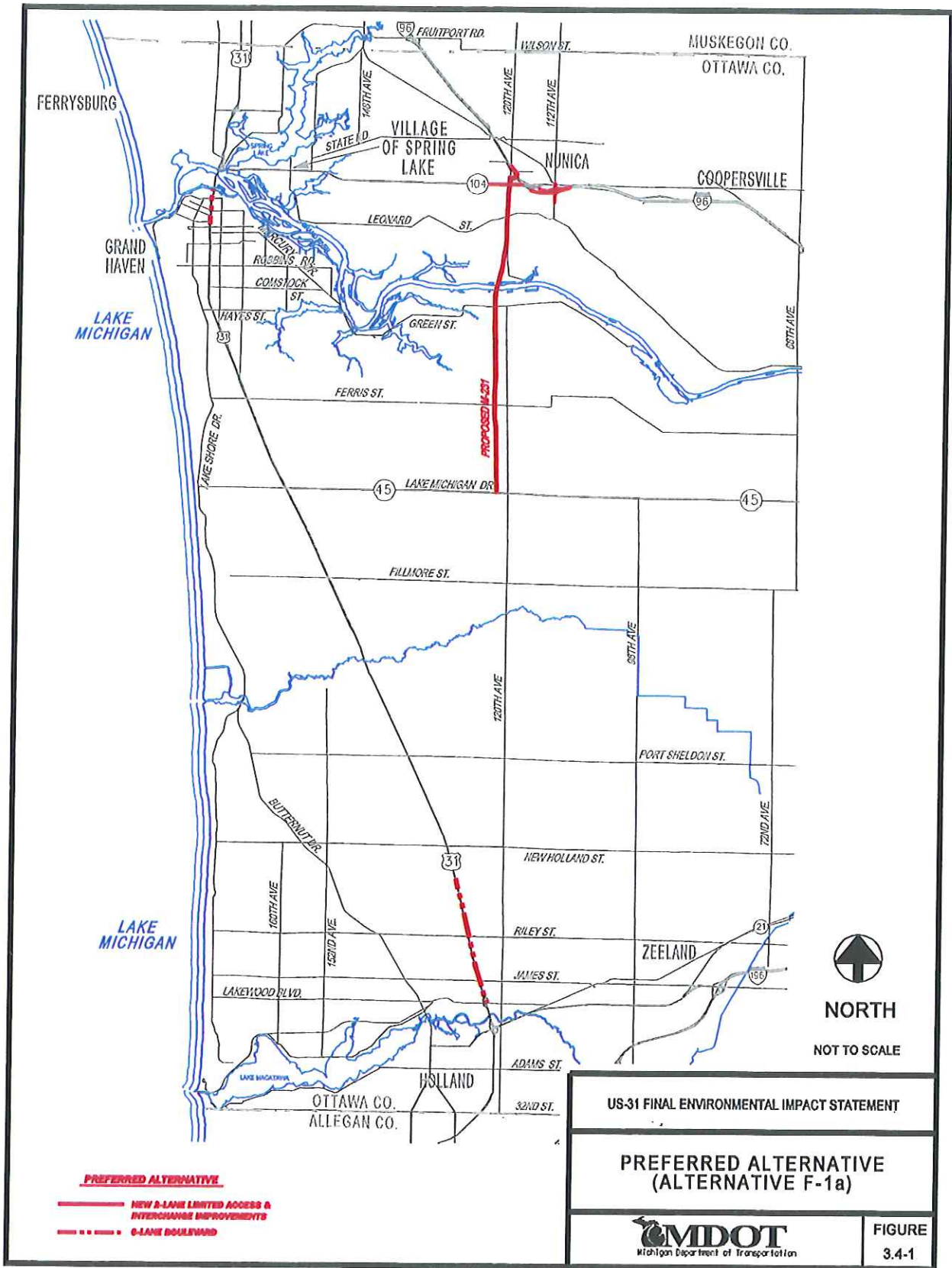
Federal Highway Administration:



Michigan Division Administrator

3/16/09

Date



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## **APPENDIX G: WETLAND MITIGATION/PUBLIC INTEREST FINDING STATEMENT**

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JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
**DEPARTMENT OF TRANSPORTATION**  
LANSING

KIRK T. STEUDLE  
DIRECTOR

July 23, 2009

Mr. Ronald Krauss, Realty Officer and Special Programs Manager  
U.S. Department of Transportation  
Federal Highway Administration  
315 W. Allegan Street, Room 201  
Lansing, Michigan 48933

Early Right-of-Way Acquisition  
Wetland Mitigation Site  
CS 70900, JN 101327  
US-31 Bypass/M-231

Dear Mr. Krauss:

The Michigan Department of Transportation (MDOT) intends to acquire parcels located on 144th Avenue, at Garfield Road, adjacent to the Grand River, per the early acquisition provisions under 23 CFR 710.501. The early acquisition of this property will protect it from potential sale and development in the private real estate market.

The total area of the all the parcels is 63.45 acres. MDOT will request the value associated with the 4.71 acre portion--proposed to satisfy the wetland mitigation requirements for this project--to be applied as credit towards MDOT's Federal Aid match of the project's future construction costs.

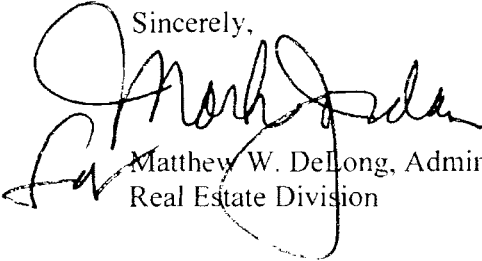
This proposed early acquisition meets the relevant federal regulatory and statutory requirements:

- Project environmental classification will be Categorical Exclusion. This action meets the Categorical Exclusion requirements referenced in 23 CFR 771.117, and does not trigger the requirements of historic preservation. Early acquisition of this parcel will not influence the environmental assessment of the project, including project need, alternative selection, or design selection.
- The Right-of-Way Phase of this project is included in the 2008-2011 State Transportation Improvement Plan and meets the public involvement requirement under 23 CFR 710.503.
- The parcel in question has been individually reviewed and cleared for acquisition by the Environmental Section. It has further been determined that this action does not have section 106 or section 4(f) implications under 23 U.S.C. 138 as they pertain to the preservation of park land.
- Acquisition of this parcel will be in accordance with the FHWA approved MDOT Procedure Manual.

Mr. Ronald Krauss  
Page 2  
July 23, 2009

MDOT is hereby requesting concurrence for eligibility of credit regarding this early acquisition under the provisions of 23 CFR Part 710, Subpart E, Sections 710.501(a) and 710.501(b), whereby the opportunity for corridor preservation and other project considerations - in this instance, wetland mitigation - can be realized as a result of purchasing the property early. If you have any questions, please feel free to contact me or Michael Christensen. Mr. Christensen can be reached at (517) 373-4139.

Sincerely,



Matthew W. DeLong, Administrator  
Real Estate Division

# **PUBLIC INTEREST FINDING STATEMENT**

**Wetland Mitigation Site in the Grand River Watershed  
on 144<sup>th</sup> Avenue, in Section 36 of Spring Lake Township, Ottawa County**

**Control Section 70900, Job Number 101327  
July 10, 2009**

## **PROJECT BACKGROUND**

The above referenced project is programmed and scheduled to be let on June 4<sup>th</sup>, 2010. The project consists of design and construction for wetland mitigation needs, resulting from the construction of the M-231 project (portions of the US-31 Bypass), near 120<sup>th</sup> Avenue, in Robinson and Crockery Townships. The proposed wetland mitigation site is located on 144<sup>th</sup> Avenue, in Section 36 of Spring Lake Township, Ottawa County. The programmed construction cost for this project is \$667,013. This project will design and construct wetlands adjacent to the Michigan Department of Natural Resources (MDNR) owned and protected property, immediately west of this project. The wetland construction will involve earthwork grading (and removal), tree removal and plantings, as necessary for the desired type of wetland. The proposed wetland water source will be from the existing shallow groundwater on the site. Habitat structures will be proposed for the mitigation area, to assist in providing nesting and cover for the existing wildlife.

This project will serve as the proposed mitigation site for the M-231 (and possibly others) projects programmed for lettings starting in FY 2010 and continuing through FY 2013. The M-231 project will construct a new two lane roadway west of 120<sup>th</sup> Avenue, from M-45 north to M-104 and I-96. This new roadway will include several new bridges, including a new bridge over Stearns Creek, Little Robinson Creek and the Grand River.

M-231, along with improvements to the existing US-31 in the Holland and Grand Haven areas, will provide congestion relief, reduce delay, increase safety and enhance access for the Holland area, City of Grand Haven and the central Ottawa County area. In addition, it will provide capacity, geometric, operational and safety modifications, as well as an additional Grand River crossing, creating route redundancy, in the event of a long-term closure of the US-31 bascule bridge in Grand Haven. Currently, traffic detoured by routine closures of the US-31 bascule bridge, must either wait for the bridge to re-open or divert to the 68<sup>th</sup> Avenue crossing of the Grand River approximately 20 miles to the east (resulting in at least a 40 mile detour). The bridge operations and closures pose potential concerns for Emergency Medical Services (EMS) access to the North Ottawa Community Hospital 1.5 miles south of the bascule bridge, as well as major user delays and mobility issues.

As required, by the Michigan Department of Environmental Quality (MDEQ) and the US Army Corp of Engineers (USACE), the wetland impacts associated with the construction of the M-231 bridges over Stearns Creek, Little Robinson Creek and the Grand River, will require wetland mitigation to be constructed before or during the construction of the impacting project (M-231). The Record of Decision (ROD), for the US-31/M-231 Final Environmental Impact Statement (FEIS), is not expected to be approved by FHWA before October, 2009. The proposed wetland location is in conformity with the FEIS and does not influence the FEIS or the selection of alternatives within the document.

The M-231 project, as programmed, is scheduled to begin with the construction of the Grand River Bridge in FY 2010, followed by road and bridge segments north of the Grand River starting construction in FY 2012, and additional road and bridge segments south of the Grand River starting construction in FY 2013. The majority of the wetland mitigation needs are resulting from the

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construction of the Grand River Bridge beginning in FY 2010. The US-31/M-231 project is in the approved Holland and Muskegon 2035 Metropolitan Planning Organization (MPO) Long Range Transportation Plans, and project Preliminary Engineering and ROW Phases are in the FY 2008-2011 STIP, for the two MPOs. Construction Phases will be added to the STIP, upon approval of the ROD. Public Involvement requirements have been addressed as required through the FEIS and the MPO planning processes. It is understood that before MDOT can acquire this parcel, it will be environmentally classified.

## **PARCEL INFORMATION**

The parcel is the preferred alternative for the proposed wetland mitigation site. It is located on 144<sup>th</sup> Avenue, at Garfield Road, adjacent to the Grand River. The parcel is entirely owned by a single property owner. The total area is 63.45 acres. The entire wetland mitigation requirement for this project can be constructed within the boundaries of this site, and no other privately owned property would need to be acquired. The early acquisition of this property will be made with MDOT funds, and only the land costs associated with acquisition of the 4.71 acres of the site will be used as credit towards MDOT's Federal Aid match of the project's future construction costs. The appraisal value of the 4.71-acre parcel is \$225,000.

To maintain this schedule and design time required for the wetland mitigation site, this property will need to be obtained prior to the Plan Completion date of March 10, 2010. The property owner is very interested in selling to MDOT, to conserve the natural quality of the property, but further delays may jeopardize the sale.

MDOT supports the acquisition of a total take of this property. The owner(s) has indicated that if this sale is not concluded soon, they must consider offers from private developers, resulting in a significant lost mitigation opportunity for the US-31/M-231 project as well as future projects in the Grand River watershed. The property will be acquired in conformance with all Federal and State regulations, including 49 CFR, Part 24, of the Uniform Act; and Title VI of the Civil Rights Act of 1964. There are no physical structures to be demolished and no personal property is located on the property, therefore Relocation Assistance will not be necessary. Considering the difficulty in finding suitable parcels for wetland mitigation along the Grand River watershed, and also due to the schedule and mitigation needs of the M-231 project, it is important that the ROW be acquired prior to the normal design schedule, and approval of the FEIS/ROD.

The mitigation requirements for the proposed US-31/M-231 Bypass project are approximately five acres. The property owner has made it very clear to MDOT that he is only willing to accept the agreed to price, under the condition that MDOT purchases it as a total take, of the Rogers ownership (Mr. Rogers has consistently maintained that position during our discussions with him). Mr. Rogers does not want to split or subdivide land due to its environmentally sensitive features, and would like the parcel to be publicly owned. The ROD is not expected earlier than October, which would not allow an offer on the property to be made until the end of 2009. Mr. Rogers has expressed a timeline that includes closing a real estate transaction with MDOT, no later than the month of August. If Real Estate staff were to inform the property owner that closing would potentially not occur until December 2009 or later, it would likely terminate negotiations with MDOT and sell to a private buyer. Developers have made repeated contacts with the Rogers family over recent years, to acquire the site for splitting into waterfront residential home sites.

MDOT understands that wetland credit provided by the FHWA will be sequential. If five acres of wetland mitigation are required for the M-231 project, FHWA will only credit those five acres at this time. As additional projects with mitigation needs are identified, additional acreage will be developed into wetlands for future credit on this site.

## JUSTIFICATION

Advanced acquisition for the above parcel is being requested for the following reasons:

MDOT has committed to local officials to begin construction of the bridge, over the Grand River, in FY 2010. Delays to the design and construction of the wetland mitigation project could in turn result in delays to the M-231 project. Delays of the M-231 projects could potentially cause deferred public benefits, by delaying congestion mitigation, safety improvements and route redundancy for US-31.

Failure to acquire the property in the near future could jeopardize the willingness of the seller to convey the property to MDOT, which could force MDOT to investigate other mitigation sites. This would result in delays in the design and construction of a viable mitigation site for the proposed M-231 project and could have the impacts as listed in #1 above.

MDOT currently has a consultant design contract for the proposed site. If MDOT was unable to acquire this property then the current design contract would have to be voided and a new Request for Proposal would have to be written and posted to obtain a design consultant for a different site. This would result in delays in the design and construction of a viable mitigation site for the proposed M-231 project and could have the impacts as listed in #1 above.

Construction of this wetland could create a contiguous ecological and biological reserve with the existing MDNR marshland to the west. This site gives MDOT a unique opportunity to create Great Lakes Coastal Marshland cooperatively with the MDNR. Great Lakes Marsh is a rare and imperiled community type, and approximately 5 acres could be created at this location. It is anticipated the site has the capacity to construct a minimum of 25 acres of wetland mitigation.

Both an Archeological and Project Area Contamination survey of the property have been performed and it was determined there was very little risk of archeological findings or contamination jeopardizing the design and construction of the proposed wetland. There are no above ground structures on the site.

The site location is consistent with the US-31 Holland to Grand Haven FEIS. The current projected schedule for obtaining the Record of Decision is late September or October, 2009. Waiting to obtain the property until after this date will jeopardize the acquisition of the property by MDOT, due to the sellers' situation and conditions (described above).

The site has the capacity to accommodate mitigation from other future projects that may impact the Grand River watershed. Having the availability of a wetland mitigation site in advance of those future projects will avoid delays to those projects and the improvements associated with them and will result in a net benefit for the motoring public, as well as the natural environment.



Vicki Weerstra, P.E.  
Associate Region Engineer



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**Michigan Division**

315 W. Allegan Street, Room 201  
Lansing, MI 48933  
517-377-1844 (office)  
517-377-1804 (fax)  
Michigan.FHWA@dot.gov

July 27, 2009

Ms. Kimberly Moody Holmes  
Environmental Section (B340)  
Michigan Department of Transportation  
Lansing, Michigan

Dear Ms. Holmes:

JN: 101327

Advance Acquisition of Wetland Mitigation Site  
Grand River Watershed (T8N, R15W & 16W, Section 31, 36)  
Spring Lake Township, Ottawa County, Grand Region

We received your July 23, 2009 letter and supporting documents, seeking FHWA approval to classify the subject project as a Class II Action (Categorical Exclusions). FHWA approves the classification of this project as a Categorical Exclusion per 23 CFR 771.117(d)(12).

Please feel free to call me at (517) 702-1847, for any additional information.

Sincerely,

Ruth. E. Hepfer  
Area Engineer

For: James J. Steele  
Division Administrator

cc: Dave Williams, FHWA  
David Calabrese, FHWA  
Ron Krauss, FHWA  
Profile No. P-24994





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

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Michigan.FHWA@dot.gov

July 27, 2009

Mr. Matthew W. DeLong, Administrator  
Real Estate Division (E050)  
Michigan Department of Transportation  
Lansing, Michigan 48833

Dear Mr. DeLong:

Early Property Acquisition  
Federal-aid Credit Eligibility Concurrence  
Wetland Mitigation Site, US-31 Bypass/M-231

We received your July 23, 2009 letter and Public Interest Finding Statement, requesting FHWA concurrence for early property acquisition eligibility as credit toward a future federal-aid project. Our focus will pertain to the 4.71 acres required for wetland mitigation as identified in the Final Environmental Impact Statement (FEIS) for the proposed M-231 construction project.

It is FHWA's understanding that MDOT intends to purchase a number of abutting parcels owned by a single property owner with 100 percent MDOT funds and request credit for the value of 4.71 acres portion of this purchase toward MDOT's future federal aid match to construct M-231. Based on the information provided, we concur that MDOT's proposed action should not influence:

- the decision on need to construct M-231
- considerations of the alternatives noted in the FEIS
- the selection of the M-231 project design or location

Please consult with MDOT environmental staff regarding the selection of this location as the preferred wetland mitigation site and the need to incorporate this Public Interest Finding Statement and related correspondence into the US-31 Bypass/M-231 FEIS. After the Record of Decision (ROD) for the FEIS is signed by FHWA, MDOT may seek credit for the value of the 4.71 acres to be applied to the M-231 construction costs by submitting a formal request to FHWA in accordance with 23 CFR 710.501(b). Please include supporting documentation to verify that the acquisition process was conducted in conformity with MDOT's Procedure Manual (Uniform Act and Title VI of Civil Rights Act of 1964) and provide the value of the 4.71 acres.



The value shall only be equated to the unimproved property. All associated right-of-way acquisition costs—title searches, appraisals, deed recording, etc.—will be 100 percent MDOT costs with no federal participation.

Please feel free to contact me at (517) 702-1822 for additional information.

Sincerely,

A handwritten signature in cursive script, reading "Ronald L. Krauss". The signature is fluid and stylized, with a long horizontal stroke at the end.

Ronald L. Krauss, P.E.  
Realty Officer and Special Programs Manager

For: James J. Steele  
Division Administrator

cc: Mark Jordan, MDOT, Real Estate Division (E050)  
Michael Christensen, MDOT, Real Estate Division (E050)  
Vicki Weerstra, MDOT, Grand Region  
Pete Loftis, MDOT, Grand Region  
Dave Calabrese, FHWA  
Dave Williams, FHWA  
Ruth Hepfer, FHWA  
Profile No. S-100953

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