Michigan Land Use Institute **Northern Michigan Environmental Action Council**
Watershed Center ~ Grand Traverse Bay

July 19, 2012

Frank Dituri, Chair
Boardman River Dams
Implementation Team
400 Boardman Ave
Traverse City, MI 49684

Carl Platz, Project Manager
US Army Corps of Engineers
307 S. Harbor Drive
PO Box 629
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Re: Cass Road Crossing and Boardman Dam Removal

Dear Mssrs. Dituri and Platz

This is to express the comments of the signatory organizations below regarding the replacement of the Cass Road crossing of the Boardman River as your organizations plan and implement the removal of the Boardman Pond dam. These comments relate to both the location of the replacement crossing as well as the design. Please include this letter as part of the public comment for the environmental review process related to the Boardman Dam project.

Bridge Location

For both ecological and financial reasons, we believe the Cass Road crossing should be replaced within the existing Cass Road corridor. Utilizing the existing corridor will minimize disturbance of natural features and habitat. Utilizing the existing road infrastructure, as much as possible, will also make most efficient use of scarce transportation funding. It is also our understanding that in order to maximize federal support for the new crossing, through funding from the Corps of Engineers, that the crossing needs to be replaced within the existing corridor.

We understand the crossing may be moved a few hundred feet west of the current powerhouse structure where it is anticipated the restored river channel will be located. This supports the overall river restoration goal of the dam removal project. We also understand that the crossing may need to be placed slightly to the north or south of the existing roadway in order to facilitate continued vehicular use of Cass Road while dam removal and river restoration activities take place.

Locating the replacement crossing within the existing corridor is also consistent with the Grand Vision, which includes a transportation guiding principle to “maintain and improve the existing road system.” The Grand Vision, which received input from more than 12,000 people in our six-county region, is a community vision for the future of transportation, land use, economic development and environmental stewardship in our region.

The importance of Cass Road was also highlighted in Grand Vision technical studies. As part of the Grand Vision's transportation analysis, the consulting firm Mead & Hunt prepared a Functional Classification Map Update for TC-TALUS (Task 4.1, August 2010). This Functional Classification Map Update classifies Cass Road, in the area of the river crossing, as a "Rural Major or Urban Collector" and, north of the river crossing, as a "Rural or Urban Minor Arterial."

As part of the Grand Vision, Mead & Hunt also prepared a Transportation Gap Analysis and Refined Corridor/Intersection Analysis Report (Tasks 3.6 and 4.2, October 2010) for TC-TALUS. This gap analysis states:

> …it is important to maintain a connection at Cass Road and Keystone Road, along with a crossing of the Boardman River. The existing river crossing is at a dam location and is a one-lane, one-way traffic signal controlled crossing. Because the other existing and anticipated Boardman River crossings are at Beitner Road to the south and Airport Road to the north, this crossing is a critical link in the regional transportation network and should be maintained. The benefits of maintaining this crossing include providing emergency access in the event one of the other structures is closed, providing an alternate route for local traffic to cross the river, and providing non-motorized connectivity. This gap analysis assumes that this crossing will be funded and conducted as part of the ongoing Boardman River Dam Removal project. (pp 42-43) (*Note: While the above quote refers to the current crossing as "one-lane" it should be understood that while it is functionally a one-lane crossing at this time, the structure itself is two lanes but has been restricted in recent years to a signaled one-lane configuration due to structural safety issues on the crossing*.)

Bridge Design

It is our understanding that the Corps and the Implementation Team are considering, at least at this early stage in the process, a possible bridge replacement option that would consist of a 100-foot pier span of the river, with possible additional spans on either side of the bridge piers. It is our understanding that this length would effectively span the floodplain in the area of Cass Road and the future restored river channel, providing important hydrologic and ecosystem benefits. We view this option as a good starting point for discussion. We understand that this option will likely accommodate, in addition to unencumbered passage of existing fish populations, a trail and some measure of wildlife passage.

This option would be the largest span on the Boardman River, while at the same time helping to accomplish the important river restoration and aquatic habitat connectivity goals of the dam removal project. Most importantly, this option would eliminate the absolute barrier to fish passage and other negative habitat impacts posed by the dam while serving as a model for future bridge replacements elsewhere on the Boardman River.

We would prefer to see the span be as large as possible, or an exploration of a possible second span to facilitate wildlife passage. We also understand that the ultimate decision will be based on a cost/benefit analysis related to the habitat restoration goals of the dam removal project, as well as available funding. We encourage all the parties involved, including the Grand

Traverse Road Commission and MDOT, to explore transportation funding avenues such as Transportation Enhancement funding, to maximize both wildlife and human connectivity opportunities with the bridge design.

The Grand Vision also includes a transportation guiding principle to "Expand transportation infrastructure serving pedestrians and bicyclists." We strongly encourage the Implementation Team and the Corps to include non-motorized connectivity features on Cass Road, including the new bridge structure, as emphasized in the gap analysis referenced above. We also encourage you to consider context sensitive design standards in order to ensure the bridge aesthetically fits into its surrounding environment.

* * *

Thank you for considering these comments. We look forward to working with the Implementation Team and the Corps as you move forward with this important project. If you have any questions regarding these comments, please direct them to Andy Knott at the Watershed Center at aknott@gtbay.org or 231.935.1514.

Sincerely,

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c: Grand Traverse County Road Commission
Grand Traverse County Commission
Traverse City Commission
Rise Raisch, MDOT