



September 20, 2023

RE: Proposed Hartman-Hammond road-and-bridge project in the Grand Traverse Region

Ms. Lane Masoud Project Manager Michigan Department of Transportation State Transportation Building 425 West Ottawa Street P.O. Box 30050 Lansing, MI 48909

Phone: 517-241-7575

Email: MasoudL@michigan.gov

Mr. Demetrius Parker Director, Bureau of Development Michigan Department of Transportation 425 West Ottawa Street Lansing, MI 48933

Phone: 517-937-1279

Email: ParkerD9@michigan.gov

Ms. Janet Arcuicci, AICP Local Agency Program NEPA Coordinator Michigan Department of Transportation **Environmental Services Section**

Cell: 517-281-7629

Email: ArcuicciJ@michigan.gov

Dear Ms. Masoud, Mr. Parker, and Ms. Arcuicci,

The Groundwork Center for Resilient Communities (Groundwork) and the Northern Michigan Environmental Action Council (NMEAC) are writing with urgency and concern regarding the Grand Traverse County Road Commission's highly controversial proposal to build a highway bridge and connector roads through the Boardman River Valley south of Traverse City. The road commission now estimates the county project would cost up to \$320 million (not including land acquisition costs) and require at least a \$60 million property tax —an unprecedented amount in the Grand Traverse Region to raise local matching funds.

We understand from recent discussions at Grand Traverse County Road Commission meetings that the Michigan Department of Transportation has questioned the cost-benefit of the proposed 1.9-mile road-





and-bridge project and also questioned the road commission's ability to fund it. Our organizations share those same doubts about the proposal to connect Hartman and Hammond roads with what would be perhaps the largest and most expensive, county-owned bridge in the United States. The proposed bridge would be 2,200 feet long, 100 feet wide, and sit on massive piers towering 70 feet in the air and extending deep into the valley floor.

Project Cost Increased Seven-Fold since May 2019 and Tripled in a Recent Nine-Month Span The Grand Traverse County Road Commission's May 2019 study (p. 51) estimated the cost of the 1.9mile Hartman-Hammond road-and-bridge project at \$44 million (\$41 million for the bridge and \$3 million for connector roads), not including the multimillion-dollar expense to acquire the right of way.

In November of 2021, the road commission and its consultants in a public presentation said that a "very high" and a "very long" bridge was needed to protect the Boardman River Valley and offered an \$81 million project estimate (\$62 million for the bridge and \$19 million for connector roads), plus the cost of land acquisition.

When the Board of Grand Traverse County Road Commissioners voted unanimously on July 28, 2022, to approve a final report that is a key step toward eventually building the road-and-bridge project, its manager said publicly that it was a \$100 million project. At its February 2023 meeting, the road commission, its manager, and lead representatives for the project's two primary consultants also discussed it being a "\$100 million project" before the road commissioners voted to approve a quarter million-dollar consulting contract to seek grant funding for it.

Just weeks later, however, in March 2023 – and only nine months after the board officially approved the \$100 million project – the road commission manager filed a form with MDOT estimating the project would cost as much as \$320 million, not including the cost to obtain right of way. Thus, in the four years since the original 2019 study, the cost estimate has increased seven-fold or by more than 600 percent.

The public did not learn that the project cost had tripled until July 2023, when Groundwork and NMEAC discovered the truth via a Freedom of Information Act request filed with the Grand Traverse County Road Commission and disclosed the higher cost to the news media. Even the road commissioners themselves expressed surprise at the actual cost of the project in a subsequent news interview and at their July 27, 2023, board meeting.

At the Grand Traverse County Road Commission's August 7, 2023, special meeting, one road commissioner called the inflated project cost and the minimum \$60 million local property tax it would require, "ludicrous" and "insane." The road commissioner said the board had been "miserved" by the consulting team, which he said should have estimated the \$320 million project cost up front and saved the road commission the time and nearly \$5 million expense to date of fruitlessly studying the out-ofreach project. The road commission manager has not adequately explained why the Hartman-





Hammond road-and-bridge project price has skyrocketed to nearly one-third of a billion dollars, when he learned of it, nor why the facts have been kept from the public and road commission board.

The public, elected and appointed officials at all levels, and MDOT and other state and federal regulators have a right to know the facts – including the true cost – about the proposed project on a timely basis in order to provide meaningful public comment on, and oversight of, the project. How else can the road commission manager, the appointed road commission, and the Grand Traverse County Board that appoints it, be held accountable? Will the cost of the proposed project continue to increase exponentially for years to come? The lack of transparency remains troubling right now as the Grand Traverse County Road Commission seeks formal letters of support for the road-and-bridge project from local governments and organizations in the Grand Traverse Region.

The proposed Hartman-Hammond road-and-bridge project remains highly contentious, with 20 of 24 public commenters at the August 24, 2023, meeting of the Board of Grand Traverse County Road Commissioners speaking against the proposal, including Traverse City's former longtime planner and elected members of the Traverse City Commissioner and Grand Traverse County Board of Commissioners, which appoints the county road commission.

Bridge Would Fail to Solve County Traffic Congestion, as the Original Study Sought to Do

Groundwork and NMEAC participated in, and support the findings of, the Grand Traverse County Road Commission's two-year study on east-west traffic flow, which was completed in May 2019. The study recommended placing a priority on improving congested and dangerously designed South Airport Road and the Beitner-Keystone corridor and specifically advised not pursuing the Hartman-Hammond bridge project in the next 10 years. The \$400,000 study found that "constructing a new corridor will provide traffic relief for a limited piece of the roadway network and does not provide relief for other corridors in the Region that are experiencing congestion."

The May 2019 study said that "benefits similar to adding another crossing of the Boardman River can be achieved with a 'mix of fixes' applied throughout the network" and could be completed faster, serve more of the county, and save millions of taxpayer dollars. Instead of pursuing the "mix of fixes," the road commission spent an additional \$2 million on a no-bid bridge study and unanimously approved the study's final report in July 2022 as a key step toward eventually building the proposed road-andbridge project – committing about \$1.8 million more for another no-bid bridge study envisioned to start this year, if MDOT approves it.

The Grand Traverse County Road Commission's 2019 study found that South Airport Road is heavily congested due to an outdated design, periodic flooding, dangerous intersections, and a proliferation of uncontrolled driveway connections. Rather than fix the neglected east-west corridor, the road commission has recently discussed its desire for "redundancy" - that is, building another South Airport Road to the south connecting Hartman and Hammond roads with a massive bridge in the Boardman River Valley.





South Airport Road, as a result, continues to sit three feet below the 100-year flood plain and remains at risk of washout near the Logan's Landing commercial development, where outdated culverts channel the Boardman River beneath the road. The Federal Emergency Management Agency has for years urged Grand Traverse County to upgrade the South Airport Road river crossing to prevent a catastrophic loss of the key east-west corridor, according to the Grand Traverse County Road Commission's recent discussion, but the road commission's July 2022 study says, "currently there are no plans to fund this project."

At its October 27, 2022, board meeting, the road commission's lead project consultant said that MDOT and other stakeholders continue to want the road commission in its final study to fully consider widening South Airport Road as a more cost-effective and less environmentally damaging alternative to a bridge connecting Hartman and Hammond roads. The consultant, however, said, "We're not taking it very far because we think it's not going to take that much to kill that alternative. We really don't. Pretty much the business impact of evaluating a seven-lane facility and a boulevard facility could do that. But we have to do it anyway – the traffic analysis, and we're gonna draw lines and identify all the properties that could be affected."

A road commissioner in the Grand Traverse County Road Commission's October 14, 2019, board meeting suggested allowing South Airport Road – which connects to Cherry Capital Airport, two regional retail malls, several commercial strips and regional big-box stores, and numerous shops and restaurants – to continue becoming "weaker" and "failing" as a commercial corridor in favor of building the Hartman-Hammond connection as its replacement.

Bridge Would Harm to the Boardman River Valley, Wetlands, and Public Parks

Groundwork and NMEAC also are deeply concerned about the lasting damage to the Boardman River and its valley, wetlands, and tributaries that is likely to result from the construction and operation of the road and bridge. The highway project would bring noisy traffic, pollution, and sprawl into a premier natural area encompassing the river that is prized for public recreation and spread the five-lane traffic and development across the hardwood forested wetlands to the west – where water springs from the ground and serves as the headwaters for Jack's Creek, a designated cold-water trout stream that flows into the Boardman River.

These are the same environmental concerns cited previously not only by our organizations, but also by state and federal agencies in raising formal objections to a similar Hartman-Hammond road-and-bridge proposal by the Grand Traverse County Road Commission about two decades ago. To develop an alternative to the project, Groundwork and NMEAC led a citizen-driven, public planning process in the late 1990s that resulted in the publication of "Smart Roads: Grand Traverse Region." The plan called for modernizing South Airport Road, creating the Beitner-Keystone parkway, and replacing the one-lane Cass Road Bridge, which in fact was replaced and widened to two lanes in 2016 and the Boardman Dam there was removed in 2017.





Much of the Boardman River is a Michigan Natural River and Blue Ribbon trout stream, and it provides about 30 percent of the surface water flow to Grand Traverse Bay. The Boardman River Valley bursts with plant and animal life and is treasured for hiking, paddling, hunting, fishing, wildlife watching, and other outdoor recreation. The river and its valley in 2018 experienced an historic milestone with the completion of the largest dam removal project in Michigan history and the largest-ever wetlands restoration in the Great Lakes region. The 14-year project removed three dams and reconnected 160 miles of the river and its tributaries.

That regional progress would be undermined by the Grand Traverse County Road Commission's proposed highway bridge, which would permanently adjoin, if not cut through, Garfield Township's 158-acre Boardman Valley Nature Preserve. The local preserve includes over a mile of Boardman River frontage and about 1.5 miles of unpaved hiking trails on the west side of the river, which connects to the outstanding regional TART Trail system. Funded in part by Michigan Natural Resources Trust Fund grants, the preserve extends to the east side of the Boardman River too, which is noted for its intact Northern White Cedar swamp in the path of the proposed bridge. No one has ever been able to recreate or replace this type of wetland.

Directly south of the township preserve is the 525-acre Grand Traverse Natural Education Reserve, a regional gem owned in portions by Grand Traverse County, Garfield Township, and city of Traverse City. The widely enjoyed educational reserve includes a nature center, seven miles of improved pathways along the Boardman River, a creek, marsh, swamp, and forest. It is home to a multitude of flora and fauna, including beaver, otter, mink, fox, deer, various bird species, and many other animals. Now the Grand Traverse County Road Commission wants to fill the Boardman River Valley back up with a massive concrete highway bridge that would be 2,200 feet long, 100 feet wide, and sit on massive piers towering 70 feet in the air and extending deep into the valley floor to carry four lanes of noisy and polluting car and truck traffic. The road-and-bridge project would violate a key goal of the road commission's own May 2019 study, which says, "The alternatives and actions should conserve the natural environment and enhance positive benefits for adjoining properties, neighborhoods, parks and businesses."

We Urge MDOT to Reject Requests for Further Study of the Hartman-Hammond Road-and-Bridge Groundwork and NMEAC urge the Michigan Department of Transportation to deny any current or future requests by the Grand Traverse County Road Commission for MDOT approval or other support for continued study of a new county road and bridge to connect Hartman and Hammond roads. The mounting public cost to study and build the highly contentious project has spiraled out of control, with the studies topping \$4.5 million since May 2019 and the construction estimate now at about \$320 million, with the road commission manager predicting in June that the project cost will likely rise once the design is complete, the cost to acquire land is known, and inflation is factored in - since actual construction could be 10 years down the road.





The Grand Traverse County Road Commission's relentless pursuit of, and public spending on, the proposed Hartman-Hammond road and bridge is moving the region farther away from real congestion relief for more residents that could be provided more quickly and at a far lower cost – and without the environmental damage to the Boardman River Valley that is likely to occur from the bridge.

People visit and reside in Traverse City and the Grand Traverse Region because of the walkable communities, natural beauty, bountiful fresh water, and myriad outdoor recreational opportunities. The Boardman River provides the very lifeblood of the region's prosperity and cherished quality of life, as it flows across Grand Traverse County now unchecked by dams, feeds a revitalized Boardman Lake, courses prominently through downtown Traverse City, and flows into Lake Michigan's West Grand Traverse Bay at the toes of tourists from around the state, nation, and world.

The Boardman River, the region, and its residents and guests deserve better than the Hartman-Hammond road-and-bridge proposal.

If you would like to discuss the issues raised in this letter with representatives of Groundwork and NMEAC, please contact Groundwork's Hans Voss to schedule a conversation at Hans.voss@groundworkcenter.org or 231-620-6914.

Sincerely,

Executive Director

Groundwork Center for Resilient Communities

414 E. Eighth Street, Suite 204

Traverse City, MI 49686

C: 231-620-6914. O: 231.941.6584 Hans.voss@groundworkcenter.org

John Nelson

Northern Michigan Environmental Action Council

PO Box 1166

Traverse City, MI 49685

C: 231.218.0890

johnaldennelson@gmail.com