



Date: 10/5/2020

## NEPA ENVIRONMENTAL COMMITMENTS

Project ID: P027507	County: Charleston	District: District 6	Doc Type: EIS	Total # of Commitments: 51
Project Name: I-526 Lowcountry Corridor West				

The Environmental Commitment **Contractor Responsible** measures listed below **are to be included in the contract and must be implemented**. It is the responsibility of the Program Manager to make sure the Environmental Commitment **SCDOT Responsible** measures are adhered to. If there are questions regarding the commitments listed, please contact:

**CONTACT NAME:** Joy Riley

**PHONE #:** (803) 737-1346

### ENVIRONMENTAL COMMITMENTS FOR THE PROJECT

<b>Special Populations</b>	NEPA Doc Ref: Chapter 4, Section 4.3.4.3	Responsibility: SCDOT
Written Translations of public involvement documents will be provided for Limited English Proficiency populations, as well as other measures determined by SCDOT to ensure meaningful access to project information during construction. Efforts will be made to ensure meaningful opportunities for public participation during construction. Additional meetings will be held when warranted to address community concerns.		

<b>Environmental Justice – Community Advisory Council</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
SCDOT will continue to support the Community Advisory Council (CAC) which was established in September 2019. The CAC consists of residents and property-owners from the impacted Environmental Justice (EJ) communities, who serve the following roles during the project development phase:		
<ul style="list-style-type: none"> <li>(a) share individual knowledge and perspectives with the project team;</li> <li>(b) provide input on project-related impacts and proposed mitigation;</li> <li>(c) serve as a voice for the EJ neighborhood residents;</li> <li>(d) and share project-related information.</li> </ul>		
SCDOT will continue to support the CAC, through the approval of the FEIS/ROD, by facilitating their regularly scheduled monthly meetings, providing technical assistance, and providing administrative support as needed.		

<b>Environmental Justice – Organizational Training</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
SCDOT will provide support for training to transition the CAC to a Project Oversight Committee (POC). This training will also be made available to residents of the impacted EJ communities who are interested in joining the POC or other groups looking to initiate community advocacy.		

<b>Environmental Justice – Community Office</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
SCDOT will maintain a Community Office throughout the project development, final design, and right-of-way phases of the project. The Community Office is staffed with a full-time Office Manager, Community Liaisons/Outreach Specialists, and part-time Right-of-Way Specialists, who will be available to provide community residents with real-time project and property acquisition information. The Community Office will also be available to serve as meeting space for the CAC/POC. The Community Office will remain in operation until the completion of the Right-of-Way Acquisition Phase.		

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT**

<b>Environmental Justice – Facilities and Amenities</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will fund the construction of replacement recreational facilities and associated infrastructure to mitigate project impacts and satisfy Section 4(f) and Section 6(f) requirements. SCDOT will acquire parcels located within the affected neighborhoods and provide funding to the City of North Charleston who will oversee construction of one large, centrally located community center complex and two pocket parks within the impacted EJ neighborhoods. Final details of the amenities to be included in the community center and the pocket park will be included in the FEIS/ROD. Construction of the new centrally located community center and the pocket parks will be completed prior to the start of construction of the I-526 LCC-West improvements.</p>		
<b>Environmental Justice – Connectivity and Pedestrian Safety</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will develop a plan to improve bike and pedestrian connectivity, safety, and mobility between the replacement community centers and recreation facilities, the surrounding EJ communities, and transit stops along Rivers Avenue. These improvements may include new and upgraded sidewalks, improved lighting, crosswalks/pedestrian signage, traffic calming, and CARTA transit stop improvements.</p>		
<b>Environmental Justice – Community Preservation Study</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will fund a study to document the cultural history and character of the impacted EJ communities through the support of a qualified historian and photographer. The study efforts will include collecting oral history, archival research, collection of historic photography, and the development of a report that will be available for viewing online and at the community center. The Community History Preservation Study will be coordinated with the schedule for the Community Livability Study and be complete within two years of the FEIS/ROD.</p>		
<b>Environmental Justice – School To Work Program</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will develop partnerships with career development and employment organizations to ensure that displaced employees are aware of offerings including career development information, job search resources, and training programs. The counseling programs will be made available to impacted businesses within one month of the public hearing.</p>		
<b>Environmental Justice – College Aid Initiative</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>Prior to construction, SCDOT will develop a partnership with local educational institutions and provide up to \$50,000 to fund a scholarship program. The scholarship program will be for high school and college students from the impacted EJ communities that intend to or currently attend the selected educational institutions.</p>		
<b>Environmental Justice – Pre-Employment Training</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>This program will be established prior to construction to provide training and job readiness skills to individuals from the affected communities. SCDOT will determine the number of participants required completing the program and the program will be the responsibility of the contractor. The contractor’s program plan and curriculum will be reviewed and approved by SCDOT. Graduates of this program will be considered for participation in On-The-Job Training (OJT) Program.</p>		

<b>Environmental Justice – Community Infrastructure Enhancement Plan</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will develop Community Infrastructure Enhancement Plan that will identify a set of improvements to address bicycle and pedestrian safety, access to community centers, enhanced street aesthetics, project-related stormwater improvements, and traffic calming measures that would be implemented as part of the project.</p>		

<b>Environmental Justice – Financial Literacy and First Time Home Buyer Counseling</b>	NEPA Doc Ref: Chapter 4, Section 4.3.9	Responsibility: SCDOT
<p>SCDOT will develop partnerships with the local organizations to provide financial literacy and first-time home buyer counseling to displaced residents, which could assist them in securing residential loans and transitioning from renters to homeowners. The counseling will be initiated during first quarter 2021.</p>		

<b>Environmental Justice – Affordable Housing</b>	NEPA Doc Ref: Chapter 4, Section 4.6	Responsibility: SCDOT
<p>SCDOT will develop a plan with the South Carolina State Housing Finance and Development Authority to construct replacement affordable housing units in the vicinity of the impacted EJ communities. The location and final number of affordable housing units will be determined prior to the approval of the FEIS/ROD.</p> <p>SCDOT is conducting early acquisition of vacant lots within the EJ communities in order to ensure families displaced by the I-526 LCC West project have affordable replacement housing options within their communities. SCDOT is investigating provisions and partnerships that will enable the replacement housing to remain affordable in the future. Displaced residents would have to meet the qualifications for the affordable housing programs.</p>		

<b>Relocation Assistance</b>	NEPA Doc Ref: Chapter 4, Section 4.6	Responsibility: SCDOT
<p>Residential: SCDOT will conduct right of way acquisition and relocation assistance in accordance with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (P.L. 91-646). Relocation resources would be made available to all eligible displaced residents, including tenants, without discrimination, consistent with the requirements of the Civil Rights Act of 1964 and the Housing and Urban Development Act of 1974.</p> <p>Business: SCDOT will assist displaced business owners and tenants by reimbursing reasonable moving costs, personal property losses, expenses in finding a replacement, and expenses in reestablishing the business. SCDOT will offer relocation counseling to employees of displaced businesses to minimize economic harm and provide information as to possible sources of funding and assistance from other local, state, and federal agencies. SCDOT will investigate partnerships with career development and employment organizations to ensure that displaced employees are aware of offerings including career development information, job search resources, and training programs. The counseling programs will be made available to impacted businesses within one month of the design public hearing.</p>		

<b>Relocation Assistance – Enoch Chapel Methodist Church</b>	NEPA Doc Ref: Chapter 4, Section 4.6	Responsibility: SCDOT
<p>To avoid the potential for additional impacts to Enoch Chapel Methodist Church, SCDOT will provide the church with elevated advisory assistance during the right-of-way acquisition phase which shall include a review of future transportation projects within the project study area.</p>		

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT**

<b>Air Quality</b>	NEPA Doc Ref: Chapter 4, Section 4.8	Responsibility: Contractor
<p>The contractor(s) will ensure particulate matter emissions will be minimized by using fugitive dust control measures such as covering or treating disturbed areas with dust suppression techniques, sprinkling, covering loaded trucks, and other dust abatement controls, as appropriate. Construction-related Mobile Source Air Toxics (MSAT) emissions will be minimized by using low emission diesel fuel for non-road diesel construction equipment. Provisions will be included in project plans and specifications requiring contractors to make every reasonable effort to minimize construction air quality impacts through abatement measures such as limiting construction equipment idling and other emission limitation techniques, as appropriate.</p>		
<b>Air Quality</b>	NEPA Doc Ref: Chapter 4, Section 4.8	Responsibility: Contractor
<p>The contractor(s) will ensure that all construction equipment is properly tuned and maintained. Idling time will be minimized to save fuel and reduce emissions. Water will be applied to control dust impacts off site. There will be no open burning of removed vegetation. Vegetation will be chipped or delivered to waste energy facilities.</p>		
<b>Noise</b>	NEPA Doc Ref: Chapter 4, Section 4.9	Responsibility: Contractor
<p>The construction of the noise barriers is tentative and subject to change as design is finalized. Evaluation of the noise barrier requirements is ongoing. Based on the detailed noise analysis, the five noise barrier walls listed below were deemed reasonable and feasible. The contractor will ensure the walls are designed and constructed to provide the appropriate noise abatement based on the parameters stated in the noise assessment completed for this project, and in close coordination with SCDOT.</p> <ul style="list-style-type: none"> <li>- NW 4/6: west of I-526 between Paul Cantrell Boulevard and Ashley River Road in West Ashley</li> <li>- NW 6a/8: west of I-526 between Ashley River Road and the Ashley River in West Ashley</li> <li>- NW 5: east of I-526 and between Paul Cantrell Boulevard and Ashley River Road in West Ashley</li> <li>- NW 7/9/10: east of I-526 between Ashley River Road and the Ashley River in West Ashley</li> <li>- NW 25: east of I-526 and southwest of I-26 in North Charleston</li> </ul>		
<b>Water Quality</b>	NEPA Doc Ref: Chapter 4, Section 4.10	Responsibility: Contractor
<p>During the construction process the contractor would avoid and minimize impacts resulting from stormwater runoff through implementation of Best Management Practices (BMPs), adhering to policies contained in 23 CFR 650 B and S.C. Code of Regulations 72-400. SCDOT has also issued an Engineering Directive Memorandum (Number 23), dated April 10, 2015, regarding Department procedures to be followed to ensure compliance with S.C. Code of 72-400, Standards for Stormwater Management and Sediment Reduction. Exposed areas would be stabilized by following the Department's Supplemental Technical Specification for Seeding (SCDOT Designation SC-M-810 (11-08)).</p>		
<b>Water Resources</b>	NEPA Doc Ref: Chapter 4, Section 4.11	Responsibility: Contractor
<p>Mitigation and other strategies as determined by requirements set forth in permits that will be needed for the proposed project to go to construction include following SCDOT best management practices including designing using the Context Sensitive Solutions (CSS) process.</p>		
<b>Floodplains</b>	NEPA Doc Ref: Chapter 4, Section 4.12	Responsibility: SCDOT
<p>The SCDOT Design/Build team will send a set of preliminary plans and request for floodplain management compliance to the local County Floodplain Administrator prior to the project letting date.</p> <p>Detailed hydraulic and hydrologic studies for each bridge crossing will be performed during final design to determine the correct sizing of bridges and culverts. The project will be designed to be consistent with local floodplain development plans.</p>		

<b>Floodplains</b>	NEPA Doc Ref: Chapter 4, Section 4.12	Responsibility: SCDOT
<p>Detailed hydrology studies have not yet been conducted at this stage of project development; however, the project would be designed in an effort to meet “No-Rise” requirements. In the event a “No-Rise” condition cannot be achieved, coordination with FEMA will require the preparation of a CLOMR (Conditional Letter of Map Revision)/LOMR (Letter of Map Revision) package for the encroachment. This includes a detailed hydraulic analysis, determination of floodplain impacts, and preparation of the CLOMR. Following construction, impacts to the floodplain would be verified prior to the issuance of the LOMR.</p>		

<b>Floodplains</b>	NEPA Doc Ref: Chapter 4, Section 4.12	Responsibility: SCDOT
<p>Where regulatory floodplains are defined, hydraulic structures will be designed to accommodate a 100-year (1% annual chance) flood.</p> <p>Where no regulatory floodplains are defined, culverts and bridges will be designed to accommodate a 50-year or greater magnitude flood event. Ongoing design efforts to minimize floodplain impacts will be coordinated with resource and regulatory agencies during the final design process.</p>		

<b>Migratory Birds</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: Contractor
<p>The federal Migratory Bird Treaty Act, 16 USC § 703-711, states that it is unlawful to pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product, manufactured or not. The South Carolina Department of Transportation (SCDOT) will comply with the Migratory Bird Treaty Act of 1918 in regard to the avoidance of taking of individual migratory birds and the destruction of their active nests.</p> <p>The contractor shall notify the Resident Construction Engineer (RCE) at least four (4) weeks prior to construction/demolition/maintenance of bridges and box culverts. The RCE will coordinate with SCDOT Environmental Services Office (ESO), Compliance Division, to determine if there are any active birds using the structure. After this coordination, it will be determined when construction/demolition/maintenance can begin. If a nest is observed that was not discovered after construction/demolition/maintenance has begun, the contractor will cease work and immediately notify the RCE, who will notify the ESO Compliance Division. The ESO Compliance Division will determine the next course of action.</p> <p>The use of any deterrents by the contractor designed to prevent birds from nesting, shall be approved by the RCE with coordination from the ESO Compliance Division. The cost for any contractor provided deterrents will be provided at no additional cost to SCDOT.</p>		

<b>Section 7</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT/Contractor
<p>Coordination with NOAA and USFWS regarding Section 7 will continue during development of the FEIS. SCDOT will provide NOAA and USFWS updated analysis for changes to previous effect determinations on protected species.</p>		

<b>Essential Fish Habitat</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT/Contractor
<p>Coordination with NOAA Fisheries regarding EFH will continue during development of the FEIS. SCDOT will provide NOAA Fisheries updated analysis for any projected increases to previously estimated impacts to EFH.</p>		

<b>Essential Fish Habitat</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT/Contractor
<p>Specific construction methods and extent and duration of impacts would ultimately be determined by the design-build contractor during final design based on guidelines and conditions established by SCDOT, FHWA, and state and federal regulatory agencies including SCDHEC-OCRM, USACE, USFWS, and NOAA-NMFS.</p>		

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT****Essential Fish Habitat**

NEPA Doc Ref: Chapter 4, Section 4.13

Responsibility: Contractor

The contractor will be responsible for ensuring causeways on temporary fill will not be utilized as the sole method of construction access for the proposed project.

**Essential Fish Habitat**

NEPA Doc Ref: Chapter 4, Section 4.13

Responsibility: Contractor

The contractor will be responsible for ensuring all temporary construction access methods, including temporary fill, timber mats, barges, and trestles and associated piles would be removed in their entirety upon completion of the bridges.

**Marine Mammals**

NEPA Doc Ref: Chapter 4, Section 4.13

Responsibility: Contractor

Drilled shafts should be used in place of driven piles where possible. Equipment and materials used during the construction of the bridge would not obstruct or impede passage through more than 50 percent of the channel. Underwater noise impacts would also be minimized through the use of "slow starts", where pile-driving ramps up slowly in an effort to deter marine species from the work area.

The SCDOT commits to implementing the following conservation measures, or actions, to minimize or compensate for effects to each species:

- Follow SCDOT Best Management Practices during construction
- Obtain NPDES permit and prepare a Stormwater Pollution Prevention Plan
- Ensure equipment does not obstruct or impede passage through more than 50 percent of the Ashley River.
- Use of "slow starts" for pile driving, barge movement, and other vessel movement where activity ramps up slowly in an effort to deter marine species from the work area.
- Avoid demolition of existing in-water structures.
- Obligations under Section 7 of the Endangered Species Act must be considered if (1) new information reveals impacts associated with this project may affect listed species or critical habitat in a manner not previously considered, (2) the project is subsequently modified in a manner which was not considered in this assessment, or (3) a new species is listed or critical habitat is determined that may be affected by the proposed improvements."
- All contractors involved in the construction will be required to comply with the USFWS Manatee Protection Guidelines (Appendix H) for in-water work.
- Conservation measures would be undertaken to minimize the three predominate risks to manatees including vessel strikes, noise, and turbidity. The contractor would adhere to the USFWS Manatee Protection Guidelines during project construction to eliminate the possibility of construction related manatee injury or death. To avoid striking manatees, construction vessels would operate at low speeds (no-wake or idle) within the project area and when operating with less than a 4-foot clearance from the bottom. The use of a designated spotter between May 15 and October 15 would provide reasonable assurance against impacts resulting from in-water work. In-water moving equipment would be halted if a manatee is spotted within 50 feet of the in-water construction area. Any collision or injury to manatees will be reported immediately to the USFWS South Carolina Field Office.
- The project manager and/or contractor would inform all project personnel that manatees may be present in the project area. The project manager would ensure that all construction personnel know the general appearance of the species and their habit of moving about completely or partially submerged in shallow water.

If explosives are used for demolition, the contractor would be required to hire qualified personnel to evaluate the potential effect on protected species to submit to SCDOT. SCDOT would be responsible for re-initiating consultation with USFWS and NOAA Fisheries. The contractor would develop a blasting plan to include a marine wildlife watch plan to submit to SCDOT.

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT**

<b>Natural Resources - Essential Fish Habitat</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT/Contractor
In accordance with the permit, the project plans and/or Environmental Compliance Plan will clearly state all environmental commitments and BMPs to be implemented during and following project construction. Contractor will be held to commitments through the life of the construction project.		

<b>Natural Resources - Essential Fish Habitat</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT/Contractor
SCDOT will work with the contractor to ensure the use of EFH specific list of general best management practices (BMPs) to minimize construction-related impacts to EFH.		
<b>Natural Resources - Essential Fish Habitat</b>	NEPA Doc Ref: Chapter 4, Section 4.13	Responsibility: SCDOT
A final mitigation plan will be developed for the 404/401 permit and will include consideration for impacts to EFH as part of that plan. This mitigation plan will be established as part of the Section 404 permitting phase of the project. SCDOT/FHWA will develop the mitigation plan in coordination with the appropriate resource agencies. The mitigation plan is to be completed as part of OFD and Section 404 permit approval.		

<b>Cultural Resources</b>	NEPA Doc Ref: Chapter 4, Section 4.14	Responsibility: Contractor
The contractor and subcontractors must notify their workers to watch for the presence of any prehistoric or historic remains, including but not limited to arrowheads, pottery, ceramics, flakes, bones, graves, gravestones, or brick concentrations during the construction phase of the project, if any such remains are encountered, the Resident Construction Engineer (RCE) will be immediately notified and all work in the vicinity of the discovered materials and site work shall cease until the SCDOT Archaeologist directs otherwise.		

<b>Cultural Resources</b>	NEPA Doc Ref: Chapter 4, Section 4.14	Responsibility: Contractor
Resource 7806 and Ashley Hall Plantation will be clearly plotted on all construction plans along with an appropriate buffer of 25 feet around each resource. This zone will be clearly delineated in the field and all ground disturbance and construction staging activities would be conducted outside of this buffer area in order to avoid all possible impacts to these resources. A 100-ft radius buffer surrounding Anomaly 006-1 is recommended for any ground disturbing activities to avoid impacts to this resource.		

<b>Cultural Resources - Archaeology</b>	NEPA Doc Ref: Chapter 4, Section 4.14	Responsibility: Contractor
SCDOT will coordinate with the Project Engineer to ensure the unknown underwater anomaly 006-1 in the Ashley River is delineated and a 100-ft radius is labeled on all plan sheets. This label shall include the following detail to Prime and Sub Contractors "Within a 100 ft radius from X coordinate 2299561.02 and Y coordinate 365570.49, the Contractor shall not place any permanent or temporary spud, anchoring device or other item that would impact the river bottom." The protected area shall be noted in the environmental compliance inspection forms for the project and evaluated during each scheduled visit. If impacts to the river bottom are suspected, notification to SCDOT ESO Compliance office shall occur and additional investigations may be needed at the expense of the Contractor.		

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT**

<b>Section 4(f) and Section 6(f)</b>	NEPA Doc Ref: Chapter 4, Section 4.15/4.16	Responsibility: SCDOT
<p>SCDOT will enter into an intergovernmental agreement with the City of North Charleston prior to the FEIS/ROD to fund the construction of replacement recreational facilities and associated infrastructure to mitigate project impacts and satisfy Section 4(f), and Section 6(f) requirements. SCDOT will acquire parcels located within the affected neighborhoods and construct one large, central community center complex, one pocket park in Russelldale and one pocket park in Highland Terrace-Liberty Park. Details related to each facility's amenities and programs to be refined in coordination with the project Community Advisory Council, the public, and the City of North Charleston. The replacement community center and reconstructed parks will be open prior to construction of the I-526 LCC-WEST improvements. Infrastructure related to the replacement recreational facilities could include, but is not limited to:</p> <ul style="list-style-type: none"> <li>- Facilities designed for senior and youth programs</li> <li>- A community garden</li> <li>- An educational wetland</li> <li>- Facility approaches to be well-lit, above minimum requirements for streetlight spacing</li> <li>- Covered shelters, grills</li> <li>- Walkways, common spaces to be user-friendly and defined by vegetation or other natural definitions; fencing should not be first choice</li> <li>- Wayfarer/directional signs to help guide residents to new facilities</li> <li>- Facility and pocket park approaches designed with pedestrian facilities, crosswalks, and traffic calming measures such as speed tables or speed bumps</li> <li>- Facility to include multiuse path to provide recreational opportunities for walking/biking and connectivity to proposed Filbin Creek Greenway system</li> <li>- Pedestrian access at Bryant Street to provide access from neighborhood streets</li> </ul>		
<b>Section 4(f) and Section 6(f)</b>	NEPA Doc Ref: Chapter 4, Section 4.15/4.16	Responsibility: SCDOT
<p>Prior to the approval of the FEIS/ROD, SCDOT and the City of North Charleston will develop an intergovernmental agreement outlining the programs, services, structural components, and arrangements for long-term operation and maintenance of the replacement community centers and recreational facilities. The agreement will include language that gives residents of the communities served by the centers priority in areas such as program enrollment/participation, reserving facility space, and volunteer opportunities.</p> <p>The City of North Charleston will continue to look for qualified candidates that live in the impacted environmental justice neighborhoods. The City of North Charleston will post job openings within the neighborhoods and encourage the CAC and neighborhood councils to submit qualified applicants.</p> <p>Final details related to programs, amenities, and community member employment opportunities at the recreational facilities will be included in the FEIS/ROD.</p>		
<b>Hazardous Materials</b>	NEPA Doc Ref: Chapter 4, Section 4.17	Responsibility: SCDOT
<p>SCDOT will ensure that hazardous materials sites are avoided where practicable or sufficiently remediated so that the public would not be exposed to health risk. Contractors will follow SCDOT's Standard Specifications, which include provisions to protect the health and safety of persons in the proximity of construction and staging sites. Lead and asbestos testing would be conducted prior to demolition to ensure that these materials are handled appropriately.</p>		



**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT**

<b>Hazardous Materials</b>	NEPA Doc Ref: Chapter 4, Section 4.17	Responsibility: Contractor
<p>Prior to construction, the project contractor will perform Phase II ESAs on the properties identified within the footprint, including the subject properties, and/or on the adjoining properties or the ROW. Ultimately, the Phase II ESAs will include environmental sample collection (e.g. soil, soil gas, and groundwater), specifically, in areas where a potential for disturbance of soil and/or groundwater exists.</p> <p>Asbestos Containing Material and/or Lead Based Paint testing will be assessed separately. Materials containing asbestos and lead-based paints will be managed and disposed of properly at an appropriate permitted facility to minimize impact during the construction and cleanup. Activities will be monitored by a professional that is certified in the removal, handling and disposal of lead-based paint and/or asbestos-containing materials.</p>		

<b>Hazardous Materials</b>	NEPA Doc Ref: Chapter 4, Section 4.17	Responsibility: Contractor
<p>A hazardous waste management plan will be prepared for the handling of hazardous materials during construction, and an on-site health and safety plan will be developed for construction activities to protect human health (i.e. workers, residents, recreation and trespassers) and the environment within proximate to the site. The hazardous waste management plan will also state that the disposal of waste materials will be disposed of in approved landfills.</p> <p>If avoidance of hazardous materials is not a viable alternative and soils that appear to be contaminated are encountered during construction, the South Carolina Department of Health and Environmental Control (SCDHEC) will be informed immediately. Hazardous materials will be tested and removed and/or treated in accordance with the United States Environmental Protection Agency and SCDHEC requirements, if necessary. SCDHEC Hazardous Waste Treatment, Storage, and Disposal compliance staff can be contacted at 803-898-0290.</p>		

<b>Construction Noise</b>	NEPA Doc Ref: Chapter 4, Section 4.17	Responsibility: SCDOT
<ul style="list-style-type: none"> <li>• The Department should utilize the public involvement process to ensure the public is aware of the schedule of project activities that may create construction noise impacts.</li> <li>• Construction noise impacts associated with earth removal, grading, hauling and paving activities should be thoroughly evaluated in conjunction with development of the construction plan.</li> <li>• Pile-driving and impact hammer activities should be performed during weekday hours and should not be performed during evening and nighttime hours, or any hours during weekends and/or holidays.</li> <li>• If meeting the project schedule requires that pile-driving and impact hammer activities must occur during evening, nighttime and / or weekend hours near residences within the project corridor, the Contractor shall notify SCDOT as soon as possible. In such instance(s), all reasonable attempts shall be made to notify and to make appropriate arrangements for the mitigation of the predicted construction noise impacts upon the affected property owners and / or residents.</li> </ul>		

<b>Public Information Strategy During Construction</b>	NEPA Doc Ref: Chapter 4, Section 4.18	Responsibility: Contractor
<p>A public information strategy will be implemented to notify the public of periods when construction is scheduled to take place, potential impacts to traffic operations, planned construction work hours, and alternate routes where applicable. To reduce peak hour impacts, night and weekend work could be scheduled. Motorists would also be notified about construction activities and changes in traffic patterns, such as detours by utilizing construction signs throughout the corridor.</p>		

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT****Transportation and Traffic**

NEPA Doc Ref: Chapter 4, Section 4.18

SCDOT and the contractor would coordinate with emergency service providers such as police, fire protection, and ambulance services prior to the start of construction to ensure access for emergency vehicles would be maintained.

A maintenance-of-traffic plan will be developed to outline measures to minimize construction impacts on transportation and traffic. To the extent possible, the plan would require access to existing residential and commercial areas be maintained and existing roads be kept open unless an alternate route can be provided.

**Stormwater Pollution Prevention**

NEPA Doc Ref: Chapter 4, Section 4.18

Responsibility: Contractor

The contractor is responsible for development of a project specific stormwater pollution prevention plan (SWPPP) and for obtaining a Section 402 NPDES permit for the project before ground disturbing construction activities begin.

**Individual Permit**

NEPA Doc Ref: Chapter 4, Section 4.18

Responsibility: SCDOT

Impacts to jurisdictional waters will be permitted under a Department of the Army Section 404 permit from the U.S. Army Corps of Engineers. Based on preliminary design, it is anticipated that the proposed project would be permitted under an Individual Army Corps of Engineers Permit (IP). SCDOT will provide the Army Corps with information regarding any proposed demolition activities during the Section 404 permitting process. The required mitigation for this project will be determined through consultation with the USACE and other resource agencies.

**Other Permits**

NEPA Doc Ref: Chapter 4, Section 4.18

Responsibility: SCDOT/Contractor

Other permits will be obtained as applicable. Please see Chapter 4, Section 4.18 for a detailed discussion of permit requirements.

**Asbestos**

NEPA Doc Ref: Chapter 4, Section 4.18

Responsibility: Contractor

During the demolition of existing bridge structures, construction activities would likely encounter lead-based paint (LBP) and asbestos containing materials (ACM). Hazardous materials should be managed and disposed of at an appropriate permitted facility to minimize impacts during the cleanup process. Release of these materials during construction activities have the potential to affect both the health and safety of the workers as well as to human health and the environment. A professional certified in the removal, handling and disposal of LBP and/or ACM may monitor construction activities. Asbestos Containing Material and/or Lead Based Paint testing would be assessed only if deemed necessary on a site-specific account and separately from the Phase II ESAs as it outside of ASTM guidelines. SCDHEC would be informed if contaminated soils are encountered during construction and measures will be employed to avoid, reduce, or otherwise mitigate environmental impacts associated with the proposed project.

**Spill Prevention**

NEPA Doc Ref: Chapter 4, Section 4.18

The contractor will prepare a spill prevention, control, and countermeasures (SPCC) plan in accordance with 40 CFR 112, for the handling of oils or oil-based products during construction to prevent discharge of oil into navigable waters.

**ENVIRONMENTAL COMMITMENTS FOR THE PROJECT****Environmental Compliance Plan**

NEPA Doc Ref: Chapter 4, Section 4.19.3.3

Responsibility: Contractor

A detailed Environmental Compliance Plan would be developed by the contractor and updated to include environmental commitments from the FEIS and ROD, environmental permits, and other environmental approvals. All coordination with state and federal agencies must be done through SCDOT's Environmental Services Office.

**Navigation**

NEPA Doc Ref: Chapter 5

Responsibility: SCDOT

During construction there is potential for temporary closure. If a closure is necessary, it would be advertised 30 days in advance and will be no longer than 48 hours. During this 48-hour period the navigation channel will be accessible to boat traffic to the maximum extent feasible. SCDOT would ensure that there would not be an unreasonable interference with navigation because the vertical and horizontal clearances would remain sufficient during construction.