



# Appendix A

## Agency Coordination Plan

### Agency Letters and Responses





# AGENCY COORDINATION PLAN



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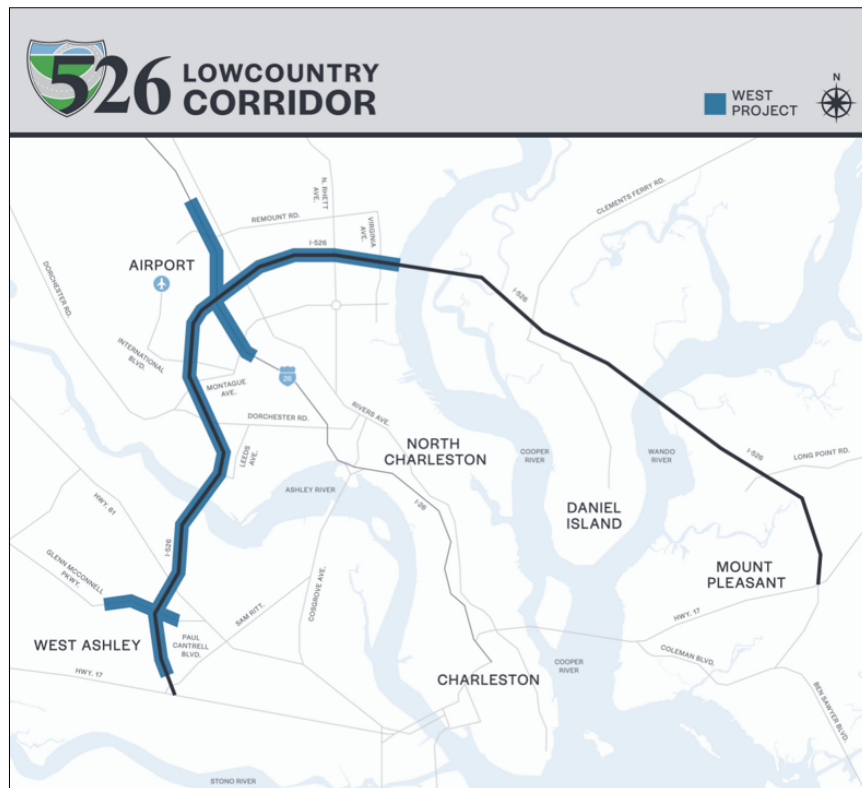
## 1.1 OVERVIEW OF THE 526 LOWCOUNTRY CORRIDOR

Interstate 526 (I-526) serves as a 23-mile-long, east-west bypass of the Charleston metropolitan area and has been identified by the South Carolina Department of Transportation (SCDOT) as one of the state’s most congested interstate highways. Specific problems within the I-526 corridor include, but are not limited to, congestion and the growing demand for capacity, and design deficiencies.

SCDOT, in cooperation with the Federal Highway Administration (FHWA), is evaluating existing and future transportation demands for I-526 corridor from just south of Paul Cantrell Boulevard in West Ashley to just south of Virginia Avenue. Named the 526 Lowcountry Corridor WEST Project (I-526 LCC WEST), this effort is intended to improve operations within the corridor for both local and through traffic.

The purpose of this project is to increase capacity at the I-26/I-526 interchange and along the I-526 mainline, thereby relieving traffic congestion and improving operations at the I-26/I-526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue.

Figure 1-1: 526 LCC WEST Study Area



## 1.2 PURPOSE OF AGENCY COORDINATION PLAN AND ONE FEDERAL DECISION

In an effort to provide for more efficient environmental reviews for project decision-making, Section 6002 of Public Law 104-59, SAFETEA-LU, as amended by Section 1304 of Fixing America’s Surface Transportation (FAST) Act and codified in 23 U.S.C. §139, requires lead agencies to develop and implement a plan for coordinating public and agency involvement during the environmental review process, particularly when the environmental review process requires an Environmental Impact Statement (EIS).

The purpose of this plan is to define the process by which SCDOT and FHWA will communicate information about the **I-526 Lowcountry Corridor WEST Project** to the agencies. The process described herein will guide SCDOT and FHWA in their communications with each other and the participating and cooperating agencies involved in the project. This Agency Coordination Plan establishes the framework for regular communication among all of the agencies involved in the environmental review process and ensures an interdisciplinary approach in planning and decision-making for any action that potentially impacts the environment. Elements of this plan include identification of the participating and cooperating agencies for the project and their responsibilities: major coordination points and tasks; impact assessment methodologies; and a schedule for the project. This Agency Coordination Plan addresses the development of the EIS in compliance with NEPA. The plan is a living document and can be modified throughout the progression of the environmental review process. A separate Public Involvement Plan has been developed in conjunction with the Agency Coordination Plan to define the process of interaction with the public and stakeholders.

In accordance with Executive Order 13807: *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects* (August 15, 2017 [[Link to Executive Order 13807](#)]), the project will follow One Federal Decision (OFD). Through a *Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807* (MOU) [[Link to Memorandum of Understanding](#)] executed in April 2018, federal agencies agree to actively participate in environmental reviews and communicate with one another in a structured process that starts early in the project development so that agencies can “identify concerns, raise potential issues early in the review process, and identify solutions.” The MOU also calls for cooperation to accomplish several relevant goals. These are:

- Completion of all environmental reviews and permitting within two years;
- Active communication between agencies;
- Concurrent reviews;
- Development of a permitting timetable; and,
- A commitment to the process and improvements of the process.

In addition to the MOU, a *Working Agreement* between the United States Coast Guard (USCG), United States Army Corps of Engineers (USACE), United States Environmental Protection Agency (USEPA), United States Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA), and FHWA [[Link to Working Agreement](#)] (collectively “Parties”) was reached for major infrastructure projects that require the preparation of an EIS. This agreement, while not legally binding, calls for:

- a. Engaging the Parties in a collaborative and integrated approach to transportation decision-making that considers benefits and impacts of proposed transportation system improvements to the

environment during the transportation planning process, and that uses the information, analysis or products developed during planning to inform the environmental review process;

- b. Concurrently conducting the environmental evaluation and processing of relevant environmental permit application materials; and,
- c. Preparing a coordinated environmental document that satisfies the National Environmental Policy Act (NEPA) requirements for all Parties and results in a shared, or joint, environmental impact decision document where practicable, and a concurrent environmental impact decision document to the extent allowable.

Both the MOU and the Working Agreement call for three major concurrence points by the participating and cooperating agencies:

- 1. Purpose and Need Statement
- 2. Range of Alternatives/Alternatives Carried Forward
- 3. Preferred Alternative

Written concurrence will be required for these major points.

It also requires that each agency identify a main point of contact (POC) for this project review for the exchange of information and timely concurrence on NEPA documents (per the project schedule). Also, each POC will coordinate with their internal decisionmakers if issues arise that cannot be resolved at the agency coordination level. The MOU and Working Agreement provide information for resolution of conflicts or issues in a timely manner.

All agencies must review and agree to the agency coordination plan and the permitting timetable, as it will be published on the Federal Permitting Dashboard. Refer to Appendix A for details on the permitting timetable and dispute resolution. Quarterly updates will be made to both the plan and the timetable, as needed, in accordance with the guidance in the MOU by the FHWA.

This Agency Coordination Plan was developed using the guidance in the OFD process and the coordination outlined in the Working Agreement. It consists of a framework for coordination, scheduling, and decision-making for the 526 LCC WEST project in order to meet the two-year timeframe for completing the environmental review and permitting process as stated in the OFD.

## 1.3 PROJECT INITIATION

The SCDOT and the FHWA have determined that the appropriate level of environmental review under the National Environmental Policy Act for the major infrastructure project referred to as the 526 LCC WEST project is an Environmental Impact Statement (EIS). The project would receive a Record of Decision (ROD) from the lead federal agency, as well as decisions on any state and federal permit applications. The SCDOT sent the NEPA Initiation Letter to FHWA in May 2019. The FHWA issued a Notice of Intent to prepare an EIS in November 2019 in the Federal Register. Refer to Appendix B.

### 2.1 LEAD, COOPERATING, AND PARTICIPATING AGENCIES

#### 2.1.1 Lead Agencies

FHWA will be the Lead Federal Agency and, as such, and SCDOT will be the Joint Lead Agency as provided in the (23 USC 139, (a) (4) & (c) (3)). Council on Environmental Quality Regulations (40 CFR 1501.5) require that a Lead Federal Agency oversee the preparation of an EIS and that Cooperating Agencies be identified. This is also consistent with the process described in the aforementioned MOU. 23 USC 139 calls for the United States Department of Transportation (USDOT) agencies to serve as the Lead Agency for any transportation project requiring USDOT approval. 23 USC 139 also allows the project sponsor, SCDOT, to serve as a Joint Lead Agency.

FHWA and SCDOT, as the Lead and Joint Lead Agencies, share the responsibility for identifying the status and level of involvement for other agencies in the development of an efficient environmental review, refer to Table 2-1. This includes the identification and invitation of Cooperating and Participating Agencies. SCDOT and FHWA are responsible for the distributions of invitations and confirmations to all agencies identified as Cooperating and Participating. Invitation letters were sent to all potential cooperating and participating agencies in March 2019. Agencies were asked to provide a written confirmation of their status as a Cooperating or Participating Agency, or formally decline the status. Copies of the confirmation letters are included in Appendix C. Federally Recognized Tribal Nations were also involved and invited to be participating agencies on this project.

The Lead Agencies are also responsible for providing requested review items to the Cooperating and Participating agencies in advance (**at least two weeks**) in order to assist the agencies in making informed comments and concurrence.

23 USC 139 also requires the Lead Agency to:

- Establish a plan for agency and public participation in the review process;
- After consultation and concurrence of each participating agency, set a schedule for the review process, including deadlines for agency and public comments; and,
- Involve the Cooperating Agencies in the development of the purpose and need, the alternatives analysis and development, and the designation of a Preferred Alternative.

Table 2-1: Lead Agencies

Agency	Role	Contact Persons	Contact Information
FHWA	Lead Federal Agency	Shane Belcher Jim Martin	<a href="mailto:Jeffrey.Belcher@dot.gov">Jeffrey.Belcher@dot.gov</a> 803-253-3187 <a href="mailto:James.martin@dot.gov">James.martin@dot.gov</a> 803-765-5693
SCDOT	Joint Lead Agency	Joy Riley Chad Long David Kelly – NEPA Will McGoldrick – Permitting	<a href="mailto:RileyJ@scdot.org">RileyJ@scdot.org</a> 803-737-1346 <a href="mailto:LongCC@scdot.org">LongCC@scdot.org</a> 803-737-1396 <a href="mailto:KellyDP@scdot.org">KellyDP@scdot.org</a> 803-737-1645 <a href="mailto:McGoldriWR@scdot.org">McGoldriWR@scdot.org</a> 803-737-1326

### 2.1.2 Cooperating Agencies

Cooperating agencies are agencies with jurisdiction by law or by virtue of special expertise (40 CFR 1501.6). A distinguishing feature of a Cooperating Agency is that the CEQ regulations (40 CFR 1501.6) permit a Cooperating Agency to, at the request of the Lead Agency, assume responsibility for developing information and preparing environmental analyses, including portions of the EIS, for which the Cooperating Agency has special expertise. An additional distinction is that, pursuant to 40 CFR 1506.3, if the Classification of Action for the project is an EIS, "a Cooperating Agency may adopt without re-circulating the environmental impact statement of a Lead Agency when, after an independent review of the statement, the Cooperating Agency concludes that its comments and suggestions have been satisfied."

Per the MOU, cooperating agencies were to identify information they need to complete their review, limit their comments to their areas of expertise, make personnel and/or expertise available to the lead agency, and complete their reviews in accordance with the agreed upon project schedule. They were also asked to provide reviews and comments on the EIS and provide concurrence on the four concurrence points identified. A list of Cooperating Agencies can be found in Table 2-2, while Table 2-3 details the invitations and responses.

Table 2-2: Cooperating Agencies

Agency	Primary Responsibility	Contact Person	Contact Information
U.S. Army Corps of Engineers (USACE)	Jurisdictional Area Determination and Section 404/10 Permitting; Wetlands and streams expertise	Lt. Col. Jeffrey Palazzini Travis Hughes Amanda Heath Richard Darden	<a href="mailto:Travis.G.Hughes@usace.army.mil">Travis.G.Hughes@usace.army.mil</a> 843-329-8046 <a href="mailto:Amanda.L.Heath@usace.army.mil">Amanda.L.Heath@usace.army.mil</a> 843-329-8025 <a href="mailto:Richard.L.Darden@usace.army.mil">Richard.L.Darden@usace.army.mil</a> 843-329-8043
U.S. Coast Guard (USCG)	Navigational Permitting for Bridges	Barry Dragon Randall Overton	<a href="mailto:Barry.Dragon@uscg.mil">Barry.Dragon@uscg.mil</a> 305-415-6743 <a href="mailto:Randall.D.Overton@uscg.mil">Randall.D.Overton@uscg.mil</a> 305-415-6736
National Park Service (NPS)	Section 6(f) Replacement Property Approval	Alexis John	<a href="mailto:Alexis.John@nps.gov">Alexis.John@nps.gov</a> 404-507-5834

**Table 2-3: Cooperating Agency Invitation**

Agency	Invited	Response
USACE	3/29/2019	4/26/2019
USCG	3/29/2019	4/10/2019
NPS	3/29/2019	8/12/2019

### 2.1.3 Participating Agencies

Participating agencies, identified in accordance with 23 USC 139, were to provide information and identify and resolve issues. Participating Agencies were identified as those federal, state, tribal, regional, and local agencies with an interest in the project and specific responsibilities in the process. Several federal and state agencies were asked to serve as participating agencies by virtue of their areas of expertise. Some of these agencies were also be asked to provide reviews and comments on the EIS and provide concurrence on the four concurrence points identified. A list of Participating Agencies can be found in Table 2-4, while Table 2-5 details the invitations and responses.

**Table 2-4: Participating Agencies**

Agency	Primary Responsibility	Contact Person	Contact Information
<b>Federal Agencies</b>			
U.S. Fish and Wildlife Service (USFWS)	Consultation on Endangered Species Act Migratory Bird Treaty Act, Bald & Golden Eagle Protection Act, Fish & Wildlife Coordination Act  Streams and wetlands expertise	Tom McCoy  Mark Caldwell	<a href="mailto:thomas_mccoy@fws.gov">thomas_mccoy@fws.gov</a> 843-727-4707 x227 <a href="mailto:mark_caldwell@fws.gov">mark_caldwell@fws.gov</a> 843-727-4707 x215
U.S. Environmental Protection Agency (USEPA)	NEPA/Environmental Justice Review  Section 404, Section 401, Water Quality	Ntale Kajumba Alya Singh-White Kelly Laycock	<a href="mailto:kajumba.ntale@epa.gov">kajumba.ntale@epa.gov</a>  <a href="mailto:singh-white.alya@epa.gov">singh-white.alya@epa.gov</a> 404-562-9339 <a href="mailto:laycock.kelly@epa.gov">laycock.kelly@epa.gov</a> 404-562-9132
NOAA National Marine Fisheries Service (NOAA Fisheries)	Essential Fish Habitat	Pace Wilber  Cynthia Cooksey	<a href="mailto:pace.wilber@noaa.gov">pace.wilber@noaa.gov</a> 843-762-8601 <a href="mailto:cynthia.cooksey@noaa.gov">cynthia.cooksey@noaa.gov</a> 843-460-9922
	Endangered Species Act/Marine	Dr. Roy Crabtree	<a href="mailto:roy.crabtree@noaa.gov">roy.crabtree@noaa.gov</a>
	Mammal Protection Act Coordination	Kelly Shotts	<a href="mailto:kelly.shotts@noaa.gov">kelly.shotts@noaa.gov</a> 727-824-5312
	Section 7	Andrew Herndon	<a href="mailto:andrew.herndon@noaa.gov">andrew.herndon@noaa.gov</a> 727-824-5312
	MMPA	Jaclyn Daly	<a href="mailto:jaclyn.daly@noaa.gov">jaclyn.daly@noaa.gov</a> 301-427-8438
Correspondence	Noah Silverman  Richard Fickley	<a href="mailto:noah.silverman@noaa.gov">noah.silverman@noaa.gov</a> 727-824-5353 <a href="mailto:richard.fickley@noaa.gov">richard.fickley@noaa.gov</a> 727-551-5705	

Agency	Primary Responsibility	Contact Person	Contact Information
<b>State Agencies</b>			
South Carolina Department of Archives and History (SCDAH)	Archaeological and Historical Resources consultation, Section 106 review	Elizabeth Johnson Joseph Wilkinson	<a href="mailto:ejohnson@scdah.sc.gov">ejohnson@scdah.sc.gov</a> 803-896-6168 <a href="mailto:jwilkinson@scdah.sc.gov">jwilkinson@scdah.sc.gov</a> 803-896-6184
South Carolina Department of Health & Environmental Control (SCDHEC); Ocean and Coastal Resource Management (SCDHEC-OCRM)	Jurisdiction of Critical Areas, Critical Area Permitting, Air, and Section 401 Water Quality & CZM consistency determinations; wetlands and streams expertise	Chuck Hightower (SCDHEC) Blair Williams (OCRM) Chris Stout (OCRM)	<a href="mailto:hightocw@dhec.sc.gov">hightocw@dhec.sc.gov</a> 803-898-0369 <a href="mailto:williabn@dhec.sc.gov">williabn@dhec.sc.gov</a> 843-953-0232 <a href="mailto:stoutcm@dhec.sc.gov">stoutcm@dhec.sc.gov</a> 843-953-0691
South Carolina Department of Natural Resources (SCDNR)	State Protected Species; wetlands and streams expertise	Robert H. Boyles, Jr. LoriAnne Riggan Susan Davis	<a href="mailto:boylesr@dnr.sc.gov">boylesr@dnr.sc.gov</a> 803-734-4007 <a href="mailto:riginl@dnr.sc.gov">riginl@dnr.sc.gov</a> 803-734-4199 <a href="mailto:daviss@dnr.sc.gov">daviss@dnr.sc.gov</a> 843-953-9003
South Carolina Department of Parks, Recreation & Tourism (SCPRT)	Consultation on Section 6(f) properties funded by Land and Water Conservation Fund Act	Justin Hancock	<a href="mailto:jhancock@scprt.com">jhancock@scprt.com</a> 803-734-1658
<b>Sovereign Nations</b>			
Catawba Indian Nation	Historic/cultural resources review (prefers hard copies of survey reports)	Wenonah Haire, THPO Caitlin Totherow	<a href="mailto:wenonahh@ccppcrafts.com">wenonahh@ccppcrafts.com</a> 803-328-2427 x224 <a href="mailto:caitlinh@ccppcrafts.com">caitlinh@ccppcrafts.com</a> 803-328-2427 x226
Eastern Shawnee Tribe	Historic/cultural resources review	Brett Barnes, THPO	<a href="mailto:bbarnes@estoo.net">bbarnes@estoo.net</a> 918-666-5151 x1845
Muscogee (Creek) Nation	Historic/cultural resources review	Corain Lowe-Zepeda, THPO LeeAnne Wendt	<a href="mailto:clowe@mcn-nsn.gov">clowe@mcn-nsn.gov</a> 918-732-7835 <a href="mailto:lwendt@mcn-nsn.gov">lwendt@mcn-nsn.gov</a> 918-732-7852

Table 2-5: Participating Agencies Invitation

Agency	Invited	Response
USFWS	3/29/2019	4/9/2019
USEPA	3/29/2019	5/6/2019
NOAA-NMFS	3/29/2019	4/26/2019
SCDAH	3/29/2019	4/9/2019
SCDHEC	3/29/2019	6/4/2019
SCDHEC-OCRM	3/29/2019	6/4/2019
SCDNR	3/29/2019	4/10/2019
SCPRT	3/29/2019	5/21/2019
Catawba Indian Nation	3/29/2019	5/3/2019
Eastern Shawnee Tribe	3/29/2019	no response, continue to consult for Section 106
Muscogee (Creek) Nation	3/29/2019	no response, continue to consult for Section 106



## 2.2 AGENCY COORDINATION MEETINGS

Agency coordination was a continuous process throughout the development of the EIS and required permit applications. The following meetings were organized with the agencies:

- Agency project kickoff and scoping workshop;
- Follow-up Agency Meeting to discuss ACP, Permitting Timetable, and P&N Statement;
- A meeting to discuss the alternative evaluation criteria, alternatives analysis process, and preliminary range of alternatives;
- A meeting to discuss the initial alternatives analysis and Reasonable Range of Alternatives;
- A meeting to discuss potential mitigation options;
- A meeting to discuss the Reasonable Alternatives and the Preferred Alternative; and,
- A meeting to discuss comments received during the public hearing comment periods and path forward to FEIS/ROD.

### 2.2.1 Agency Project Kickoff and Scoping Meeting

The initial Agency Coordination Meeting was held on March 14, 2019, prior to the issuance of the Notice of Intent to prepare an EIS. This meeting was a project kickoff/scoping workshop to seek the Agencies' perspective and requirements for the scope of the environmental evaluation and to discuss the draft Purpose and Need statement for the project. The draft Agency Coordination Plan was presented and discussed as well as a draft schedule for the project. The NEPA process for this project was discussed with regards to the OFD process and the roles and responsibilities of agencies under OFD.

In addition, the agencies received a copy of the draft agency coordination plan and permitting timetable/project schedule for the project at this meeting.

### 2.2.2 Follow-up Meeting to Discuss Agency Coordination Plan, Permitting Timetable, and Purpose and Need Statement

A meeting was held on April 23, 2019 to finalize the agency coordination plan and permitting timetable. This meeting was held before the NOI was published, as both the agency coordination plan and project schedule needed to be published on the Federal Permitting Dashboard in a timely manner after the NOI was published.

### 2.2.3 Alternative Evaluation Criteria, Alternatives Analysis Process, and Preliminary Range of Alternatives

A meeting was held on August 14, 2019 to discuss the criteria to be used for evaluating alternatives and the alternative analysis process for the project. This meeting was important to ensure that the lead agencies were evaluating alternatives in a way that can be used by other agencies in their evaluation process for permits and other approvals that are needed for the project.

### 2.2.4 Initial Alternatives Analysis and Reasonable Range of Alternatives

A meeting was held on October 9, 2019 to present the development and analysis of the preliminary alternatives, including the alternative evaluation criteria, preliminary alternatives considered and

eliminated and the reasons for the elimination. The result of the meeting was the alternatives carried forward for further analysis as the reasonable alternatives in the EIS. In addition, potential mitigation options for impacts were also discussed at this meeting.

### 2.2.5 Potential Mitigation Options

An initial meeting was held on September 11, 2019 to facilitate a preliminary discussion about the mitigation needs assessment. An additional meeting was held on December 11, 2019 to discuss mitigation preferences and options with the agencies. This was the culmination of previous discussions with the agencies and the presentation of the development of mitigation options and the primary mitigation package to be incorporated into the permit applications. A meeting was held on March 11, 2020 to provide a project update as well as to discuss the mitigation needs assessment progress.

### 2.2.6 Reasonable Alternatives and Preferred Alternative

A meeting was held on May 14, 2020 to present the impacts and benefits of the Reasonable Alternatives for discussion by the agencies as well as the Preferred Alternative that the Lead Agencies are proposing for the project. Since impacts were quantified, mitigation was again be discussed at this meeting.

### 2.2.7 Post Public Hearing Comment Meeting and Path Forward to FEIS/ROD

A meeting will be held once the public hearing comment period ends for the DEIS and public notices of the USACE and USCG, and the comments have been evaluated. The agencies will be briefed on the comments received from the public. In addition, there will be a discussion of the comments the agencies provided on the DEIS if there are any outstanding issues not previously addressed. Any major revisions to the alignment as a result of the public will be discussed at this meeting, as well as the offsetting benefits/impacts of those revisions. Mitigation options for offsetting impacts will be discussed in more detail at this meeting for inclusion into the ROD as well for other agencies to make permitting decisions.

In addition, monthly teleconference calls were scheduled and conducted as necessary. Other meetings were held if it is determined they would be beneficial to the process. There was also consultation with the Cooperating Agencies concerning the information needed in the EIS for their respective permitting decisions, the identification of the Reasonable Alternatives and the designation of a Preferred Alternative. There was also be coordination with the Participating Agencies for obtaining their expertise regarding technical issues (refer to List of Agencies & Primary Responsibilities in Table 2-3) during the development of the EIS. Table 2-6 shows a list of all agency coordination meetings. Refer to Appendix D for detailed meeting summaries.

Table 2-6: Agency Coordination Meeting

Date	Topic	Agencies Participating
3/14/2019	Agency Project Kickoff and Scoping Workshop	USEPA, USFWS, NOAA Fisheries, SCDHEC, SCDHEC OCRM, SCDAH, SCDNR, SCPRT
4/23/2019	Agency Coordination Plan, Permitting Timetable, Purpose and Need Statement	USACE, USEPA, USFWS, SCDHEC, SCDHEC OCRM
7/10/2019	Agency Meeting to Discuss Permitting Timetable and Agency Milestones	USACE, USEPA, USFWS, NOAA Fisheries, NPS, SCDAH, SCDHEC, SCDHEC OCRM, SCPRT
7/25/2019	Follow-up Meeting to Review Milestones Specific to Section 7 and MMPA	NOAA Fisheries
8/14/2019	Alternatives Evaluation Criteria, Alternatives Analysis Process, and Preliminary Range of Alternatives	USACE, USCG, USEPA, NOAA Fisheries, SCDAH, SCDHEC OCRM, SCDNR
9/11/2019	Mitigation Needs Assessment	USACE, USEPA, USFWS, NOAA Fisheries, SCDAH, SCDHEC OCRM, SCDNR, SCPRT
10/9/2019	Initial Alternatives Analysis and Reasonable Range of Alternatives	USACE, USFWS, NOAA Fisheries, NPS, SCDAH, SCDHEC OCRM
10/21/2019	Section 6(f) Process	NPS, SCPRT
11/13/2019	Concurrence Points and Upcoming Milestones	USACE, USCG, USEPA, USFWS, NOAA Fisheries, SCDAH, SCDHEC OCRM, SCDNR, SCPRT
12/9/2019	Section 6(f) Conversion Process	NPS, SCPRT
12/11/2019	Potential Mitigation Options	USACE, USCG, USFWS, NOAA Fisheries, NPS, SCDAH, SCDHEC OCRM, SCDNR
1/8/2020	Public Involvement Update	USACE, USCG, USEPA, USFWS, NOAA Fisheries, SCDAH, SCDHEC OCRM, SCDNR
2/12/2020	Reasonable Alternatives Discussion and the Alternatives Evaluation Process Workshop	USACE, USCG, USEPA, USFWS, NOAA Fisheries, SCDHEC OCRM
3/11/2020	Project Update and Mitigation Needs Assessment	USACE, USCG, USEPA, USFWS, NOAA Fisheries, SCDHEC OCRM, SCDNR, SCPRT
4/8/2020	DEIS Update and Preliminary Evaluation of Floodplain Mitigation	USACE, USCG, USEPA, USFWS, NOAA Fisheries, NPS, SCDAH, SCDHEC OCRM, SCDNR, SCPRT
5/13/2020	Review of Recommended Preferred Alternative	USACE, USCG, USEPA, NOAA Fisheries, NPS, SCDAH, SCDHEC, SCDHEC OCRM, SCDNR, SCPRT
6/10/2020	Project Mitigation Strategy Update	USACE, USEPA, NOAA Fisheries, SCDHEC OCRM, SCDAH
8/12/2020	Section 6(f) Update	USACE, USCG, USEPA, USFWS, NOAA, NPS, SCDHEC, SCDHEC OCRM, SCDNR
9/9/2020	EJ Mitigation Plan Update	USACE, USCG, USEPA, USFWS, NOAA, NPS, SCDHEC, SCDHEC OCRM, SCDNR, SCPRT
10/14/2020	Agency Milestones, DEIS Update, Shared Use Path and Public Hearing	USACE, USCG, USFWS, NOAA, NPS, SCDHEC, SCDHEC OCRM, SCPRT

## 2.3 CONCURRENCE POINTS

Concurrence points were sought at various points during the NEPA process, per the requirements in the OFD MOU and Working Agreement. The FHWA and SCDOT requested written concurrence on the following points:

1. The Agency Coordination Plan and Permitting Timetable
2. Purpose and Need Statement
3. Reasonable Range of Alternatives/Alternatives to be Carried Forward
4. Preferred Alternative

In addition to these concurrence points, the agencies agreed in writing to the agency coordination plan and the permitting timetable/schedule, per the OFD MOU and Working Agreement. Concurrence was tracked as part of this plan in Table 2-7. Note: Concurrence on the four concurrence points above was only needed from cooperating agencies. However, to ensure that concerns are addressed during the NEPA process, the lead agencies requested concurrence from all participating agencies also.

**Table 2-7: Concurrence Tracking**

Concurrence Point: ACP, P&N		
Agency	Date of Concurrence	
NOAA-NMFS	June 7, 2019 (request specific dates for Table 3-1 in ACP)	
NPS	October 9, 2019	
USACE	June 7, 2019	
USCG	June 4, 2019	
USEPA	August 19, 2019	
USFWS	June 3, 2019	
SCDAH	June 4, 2019 (no comment on P&N)	
SCDHEC	No Objection	
SCDHEC-OCRM	No Objection	
SCDNR	June 3, 2019	
SCPRT	June 6, 2019	
Concurrence Point: Permitting Timetable, Agency Milestones		
NOAA-NMFS	September 3, 2019	
NPS	October 9, 2019	
USACE	September 13, 2019	
USCG	September 5, 2019	
USEPA	August 21, 2019	
USFWS	August 20, 2019	
SCDAH	August 21, 2019	
SCDHEC	No Objection	
SCDHEC-OCRM	No Objection	
SCDNR	August 22, 2019	
SCPRT	June 6, 2019	
Concurrence Point: Reasonable Alternatives		
	FHWA Letter Sent	Agency Response
NOAA-NMFS	March 12, 2020	March 23, 2020
NPS	March 12, 2020	April 6, 2020
USACE	March 12, 2020	March 27, 2020

USCG	March 12, 2020	March 26, 2020
USEPA	March 12, 2020	April 8, 2020
USFWS	March 12, 2020	March 16, 2020
SCDAH	March 12, 2020	April 2, 2020
SCDHEC	March 16, 2020	No Objection
SCDHEC-OCRM	March 12, 2020	No Objection
SCDNR	March 12, 2020	March 19, 2020
SCPRT	March 12, 2020	No Objection
<b>Concurrence Point: Preferred Alternative</b>		
	<b>FHWA Letter Sent</b>	<b>Agency Response</b>
NOAA-NMFS	June 3, 2020	June 12, 2020
NPS	June 3, 2020	June 18, 2020
USACE	June 3, 2020	June 19, 2020
USCG	June 3, 2020	June 8, 2020
USEPA	June 3, 2020	June 26, 2020
USFWS	June 3, 2020	June 8, 2020
SCDAH	June 3, 2020	June 5, 2020
SCDHEC	June 3, 2020	No Objection
SCDHEC-OCRM	June 3, 2020	No Objection
SCDNR	June 3, 2020	June 8, 2020
SCPRT	June 3, 2020	June 24, 2020

## 2.4 DOCUMENT REVIEW

Those agencies with authority or particular expertise were asked to review technical documentation, such as the Jurisdictional Determination request (USACE, USEPA, SCDHEC, and SCDHEC-OCRM), the Cultural Resources Report (Tribal Nations and SHPO), and the Natural Resources Technical Report (USACE, USFWS, NMFS, SCDNR, and SCDHEC). In addition, cooperating and participating agencies were given the opportunity to review sections and appendices of the Draft EIS early prior to the publishing of the DEIS so that their comments could be addressed to the maximum extent possible before the DEIS was published.

## 2.5 PERMITTING

Based on early coordination with the USCG, a determination of the need for a USCG permit for the Ashley River bridge widening was made. The USCG was provided an initiation letter and navigation impact report. The USCG issued a preliminary navigation determination on June 25, 2019. The FHWA and SCDOT will provide USCG with the information necessary for the USCG to issue a public notice on navigation with a 30-day comment period when the DEIS is issued. Soon after, the lead agencies will submit a permit application to the USCG in accordance with the bridge permit application guide.

The USACE was provided a Pre-NOI package of information to assist them in making a preliminary permit determination on that will be required. It is anticipated that a joint USACE/SCDHEC Section 404 Individual Permit (IP) Application will be prepared for proposed wetland and critical area impacts. The Lead Agencies will also coordinate with SCDHEC and SCDHEC-OCRM with regards to the Section 401 Water Quality Certification, Coastal Zone Certification, and Critical Area Permit Decision. The USACE package will include:

- project impact areas
- wetland delineation

- Coordination with Corps on impact areas
- alternatives analysis
- avoidance and minimization of impacts, and
- potential compensatory mitigation options

The schedule for submittal and review times for the permitting will be determined in consultation with the regulatory agencies during the initial Agency Coordination Meeting.

### PROJECT PROGRESS

Since the project inception there have been many tasks completed for this project. These tasks included environmental studies, public outreach, surveying, traffic analysis, preliminary design and initial cost estimates. The efforts that have been completed to date for the project include:

- Field studies for cultural resources, natural resources, hazardous materials have been completed. This included additional underwater archaeology along the Ashley River bridge.
- Meetings have been held with local governments and elected officials.
- Community meetings were held in North Charleston and West Ashley.
- Stakeholders were identified and 8 stakeholder meetings have been held.
- Traffic counts have been performed and future traffic forecasts have been developed for 2050.
- Conceptual road alternatives have been developed based on the 2050 traffic modeling.
- Hydrologic surveys have been completed and initial drainage designs have begun.

Table 3-1: Draft NEPA/Permitting Schedule

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>March 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 29, 2019
Agencies review draft Purpose and Need Statement	April 2019
Agencies review Agency Coordination Plan and Permitting Timetable	March-April 2019
<i>Follow-up Agency Meeting to discuss ACP, Permitting Timetable, and P&amp;N Statement</i>	<i>April 23, 2019</i>
<b>Concurrence Point for Agency Coordination Plan</b>	<b>May 2019</b>
<b>Concurrence Point for Purpose and Need Statement</b>	<b>May 2019</b>
Project Initiation Letter and Navigation Report sent to USCG	May 21, 2019
USCG Preliminary Navigation Determination Issued	June 11, 2019
Consultation initiated with SHPO/THPO	June 18, 2019
Submit Preliminary JD to USACE & Critical Area to SCDHEC-OCRM	July 2019
<i>Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives</i>	<i>August 14, 2019</i>
Agencies Review the Preliminary Range of Alternatives for Concurrence	August 2019
<b>Concurrence Point for Agency Milestones and Permitting Timetable</b>	<b>August 2019</b>
Community and Stakeholder Meetings	August-November 2019
<i>Agency Meeting to discuss mitigation needs assessment</i>	<i>September 11, 2019</i>
JD and Critical Area Line plat approval	September 2019
<i>Agency Meeting to discuss initial Alternatives Analysis and Reasonable Alternatives</i>	<i>October 9, 2019</i>
FHWA issues Notice of Intent (NOI)	November 1, 2019
Public Information Meeting	November 21, 2019
<b>Concurrence Point for Reasonable Alternatives</b>	<b>November 2019</b>
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall/Winter 2019
<i>Agency Meeting to discuss potential mitigation options</i>	<i>December 2019</i>
2020	
Potential mitigation site visits	Spring 2020
<i>Agency Meeting to discuss Proposed Preferred Alternative</i>	<i>May 2020</i>
Preliminary Draft EIS section for review by Agencies	Spring/Summer 2020
<b>Agency Meeting and Concurrence Point for Preferred Alternative by Agencies</b>	<b>June 2020</b>
NOAA receives the complete EFH assessment to initiate EFH consultation	July 2020
Pre-Application Meeting with USACE and SCDHEC	July 2020
Consultation with SHPO/THPO on Preferred Alternative	July 2020
Initiate Informal ESA consultation with USFWS	July 2020
Application submittal	August 2020
Section 106 consultation concluded	September 2020
Draft EIS issued; Joint USACE Individual Permit and USCG Public Notices	October 2020
Community and Stakeholder Meetings	Fall 2020
Public Hearing	November 2020
Response to Public and Agency Comments	Winter 2020-2021
2021	
<i>Agency Meeting to discuss comments received during the public hearing comment periods and path forward to FEIS/ROD</i>	<i>January 2021</i>
Response to comments	March 2021
SCDHEC 401 Decision	May 2021
SCDHEC-OCRM CAP	June 2021
Prepare Final EIS/Record of Decision	Summer 2021
FHWA Issues FEIS/ROD	July 2021
USACE Issues Permit Decision	August 2021
USCG Issues Permit Decision	September 2021



Version	Date	Person Making Revision	Description of Changes
2	04/05/2019	Heather Robbins (3Oaks)	Added contact information to Table 2-2
3	06/03/2019	Heather Robbins (3Oaks)	Updated with Cooperating/Participating Agency Responses, Permitting Timetable, and Agency Coordination Process Agreement & Dispute Resolution.
4	06/25/2019	Heather Robbins (3Oaks)	Updated Table 3-1 with items in blue and Table 2-6 with agency concurrence
5	8/21/2019	Heather Robbins (3Oaks)	NPS request to be cooperating agency; revised Agency tables to reflect; update Concurrence Tracking Table
6	10/8/2019	Heather Robbins (3Oaks)	Reasonable Alternatives Concurrence Point added
7	5/12/2020	Heather Robbins (3Oaks)	RA Concurrence Dates added, Preferred Alternative Concurrence Point
8	7/2/2020	Shelby Moody (3Oaks)	Recommended Preferred Alternative Concurrence Dates added
9	8/13/2020	Geni Theriot (3Oaks)	Agency Meetings Updated in Table 2-6
10	9/11/20	Heather Robbins (3Oaks)	Agency Meetings Updated in Table 2-6
11	10/16/2020	Mark Mohr (3Oaks)	Agency Meetings Updated in Table 2-6



## APPENDIX A

Permitting Timetable, Agency Coordination  
Process Agreement & Dispute Resolution

# Permitting Timetable

Revised 1/23/2020



2019	January	February	March	April	May	June	July	August	September	October	November	December
Action					<b>CP ACP + Purpose and Need</b> USCG Navigation Data Report to USCG	USCG Preliminary Navigation Determination Issued Consultation initiated with SHPO/THPO Section 106 Consultation initiated (6/18)	Submit JD and CALP packages NMFS Initially Contacted Regarding MMPA Consultation	Agency Meeting to Discuss Alternatives Evaluation Process/Criteria & Preliminary Range of Alternatives (8/14) <b>CP Agency Milestones and Permitting Timetable</b>	Agency Meeting to Discuss Mitigation Needs Assessment (9/11)	Agency Meeting to Discuss Alternatives Analysis and Reasonable Alternatives (10/9) <b>JD + Critical Area Line Plat Approvals</b>	NOI issued (11/8) Det. of Applicability of Section 4(f) Agency Meeting (11/13) Section 106 Consulting parties invited Public Information Meeting (11/21)	Agency Meeting to Discuss Mitigation Alternatives (12/11)
2020	January	February	March	April	May	June	July	August	September	October	November	December
Action	Agency Meeting to review Public Comment (1/8)	<b>CP Alternatives Carried Forward</b> Agency Workshop to Discuss Interchange Design Alternatives (2/12) Initial 6(f) Application received	Agency Meeting to Discuss Update on Mitigation Needs Assessment (3/11)	Request for ESA Consultation Report (NMFS)	Agency Meeting to Discuss Proposed Preferred Alternative Draft EFH assessment submitted (5/8)	<b>CP Preferred Alternative</b> Section 106 determination of effect made by FHWA	NMFS receives Complete EFH Assessment to initiate EFH Consultation (7/8) <b>Pre-Application Meeting with Agencies (Fed &amp; State) Public Hearing Agency Planning Meeting</b> Consultation with SHPO/THPO on Preferred Alternative Section 7 Consultation Package complete (NMFS)	<b>Application Submittal-Individual 404 Permit/USCG</b> Initial State Application received CAP, 401	Section 106 consultation concluded NMFS issues response to EFH assessment (9/8) Completed 6(f) Application received	DEIS Notice of Availability <b>Public Notice: USACE/USCG/CAP/401</b> FWCA Review initiated Request for ESA Consultation Report (USFWS)	<b>Public Hearing-Joint Notice to cover all agencies</b> FWCA Comments to USACE Section 7 Conclusion of Consultation/Issuance of Biological Opinion (NMFS) Section 7 Consultation Package complete (USFWS)	
2021	January	February	March	April	May	June	July	August	September	October	November	December
Action	Comments Due: 404b.1/401/CAP/USCG Agency Meeting to discuss Comments		Response to Comments due to USACE/OCRM/USCG/DHEC Section 7 Conclusion of Consultation/Issuance of Biological Opinion (USFWS)		401 Decision	Critical Area Permit			Coordination with/Concurrence from Officials with Jurisdiction 4(f) Section 6(f) Issuance of Decision for Permit/Approval & NTP	FEIS/ROD Approval (30 day wait period) USACE Prepares Draft ROD FHWA Approval/Conclusion of Section 4(f)	USACE Permit Decision/Signs ROD 30 days after FEIS; Complete Application submitted to USCG	USCG Permit Decision
2022	January	February	March	April	May	June	July	August	September	October	November	December
		90 Day post ROD period ends										

Public Notice must occur by 10/2 or schedule shifts

Adjustments to the proposed schedule may be made when sufficient information is available for an agency to proceed with an action so long as that action does not adversely affect the overall permitting timeline.

Unless specified, an action within a month will be completed by the end of the month.

A 10-day comment period will be requested for each Concurrence Point.

## I-526 WEST Environmental Impact Statement

### Agency Coordination Process Agreement & Dispute Resolution

This process calls for a commitment by all parties to work cooperatively and abide by the consensus decisions of the group. SCDOT and FHWA commit to coordinate agency concerns and needs and distribute adequate information in a timely manner. In return, the SCDOT and FHWA expect the agencies to commit to providing a dedicated individual to the project to attend the meetings and to provide prompt review and decision-making.

The goals of this process agreement are to:

- Increase agency involvement
- Develop a mechanism that leads to decisions that stick
- Improve the process efficiency
- Meet or exceed agency mandates
- Enhance communication and relationships

The specific steps to be taken to reach these goals are described in the following sections.

#### Increase Agency Involvement

Increased involvement by the agencies will lead to better decisions. SCDOT and FHWA commit to listen to comments from the agencies and provide responses to these comments as the project is being developed. They also commit to a process that allows for viewpoints to be shared among the participants. Multiple opportunities to be involved in the development of the project will be on going throughout the process and include agency participation in the purpose and need, analysis criteria, development of alternatives, selection of alternatives for further study, selected alternative, mitigation of unavoidable impacts, and project design features. This will be accomplished through a series of meetings throughout the process, with agreed concurrence at specific decision points outlined in the Agency Coordination Plan.

#### Decisions That Stick

The goal is that increased involvement and frequent meetings will keep everyone informed and help to build consensus on issues. Through shared information and open and frequent discussions of the issues during the project, consensus and decisions can be reached. At key points in the process (refer to Agency Coordination Plan) agreements will be required. A letter of concurrence by each member at these key points will be integral to the process. Once a decision is reached on each point, the issue will not be revisited during the project, unless new scientific information becomes available or a significant change in circumstances develops that would affect the concurrence.

Also, necessary will be a dispute resolution process. In the event that the agencies are unable to arrive at an agreement, a process for resolving these disputes will be necessary. A mutual interagency effort is needed to achieve timely resolution of issues. The agencies agree to:

- Encourage constructive communication to avoid unnecessary stress on

interagency relationships

- Recognize disagreements as they occur and initiate dispute resolution procedures
- Keep decision making at the team level, with staff who have specific project knowledge and relevant expertise
- Quickly elevate unresolved issues to higher-level decision makers, so they may apply a broader policy perspective, where needed.

Reasons to initiate the Dispute Resolution Process include, but are not limited to:

- Unresolved written non-concurrence
- Lack of response within agreed-upon time limits
- Substantive departure from the interagency coordination process
- Disagreement on purpose and need, methodology, range of alternatives to be considered, preferred alternative, or recommended actions to avoid, minimize, and compensate for impacts
- Disagreement over adequacy or interpretation of information
- Disagreement on the nature and extent of impacts
- Disagreement over application of legal requirements

A proposed resolution process is included as Appendix A to this document.

#### Improve Process Efficiency

Too often with projects, agencies are asked to make decisions without the benefit of all the information that is needed. This can lead to delayed decisions, as they then have to acquire information. To address this, it is proposed that there be frequent communications between agency members. Regular emails providing information will be sent to the agencies by the Project Team. This will accomplish two things. First, everyone will be kept up to date on the project; communication will be open and frequent. Second, the “learning curve” will be kept short; there will be no surprises. Sufficient information will be provided to agencies at least two weeks before a decision is required. Agencies will be expected to make a decision within two weeks of each decision point.

#### Meet or Exceed Agency Mandates

This process will allow agencies to meet and/or exceed their mandates. The agencies can have their issues, policies, and goals addressed by being involved in the development and selection of alternatives. In addition, enhancement features that help to meet specific goals can be incorporated into the project design. Thus, the agencies are better positioned to see that their individual charges are satisfied by the project.

#### Enhance Communication and Relationships

The commitment of individuals to the development of a project, coupled with frequent communication and discussion of issues, will lead to an enhancement of relations between all participating members. Lines of communication will be established between individuals (hence agencies). Trust will be built through honest dialogue during project development. An improved understanding of each other’s positions will be realized through this process.

## Appendix A: Draft Dispute Resolution Process

### I. Introduction

The purpose of this dispute resolution process is to provide a procedure to resolve disagreements among agencies. The intention of this procedure is to try to expeditiously resolve conflicts through consensus without elevating them. However, if consensus cannot be reached on an issue, the issue will be taken to a higher level of authority. Dispute resolution procedures may be initiated upon request of any agency.

#### Level One – Agency Representative Resolution through Intensified Communication on an Issue

Focused Level One discussion is the first resort for issue resolution and includes: recognition that there is an issue that needs to be resolved; clear articulation of that issue and bringing the issue to the attention of the other agencies; open and respectful discussion of the issue in a forum specifically focused on that issue, where all perspectives are aired and heard; joint problem solving to seek a solution that will satisfy the diverse needs of the various agencies involved; and documentation of decisions. When any agency believes there is an unresolved issue that needs attention, the representative from that agency may request intensified communication and problem solving on that issue. To initiate resolution, the requesting agency representative will fill out the Request for Discussion form and send it to the other agencies. (See attached template, “Request for Issue Discussion”.) If the issue is not resolved within 20 days of the initial Request for Issue Discussion, the issue will be automatically elevated to Level Two, unless the participating agencies agree that further discussion at Level One is likely to resolve the issue within an agreed-to timeframe.

During the Level One issue discussion, the participating agencies are encouraged to apply the following guidance:

- If appropriate, the agencies are encouraged to consider an on-site meeting to discuss the project issue.
- Each agency should bring appropriate agency expertise to the discussion (e.g., an individual or information/guidance materials).
- Each agency should bring or have access to a person who has the authority to approve a decision made at that level.
- The agencies should use a discussion format which provides for orderly and constructive communication and good listening. Such a format may consist of:
  1. An opening statement of the issue by the requesting agency, without interruption, including articulation of the issue and that agency’s needs, concerns, and ideas (i.e., Why is this issue important to your agency? What does your agency want to accomplish through resolution of this issue? What options would your agency like to consider, and why?)
  2. A round robin discussion in which each agency takes a turn, without interruption, expressing that agency’s perspective on the issue, including that agency’s needs,

concerns, and ideas (i.e., Why is this issue important to your agency? What does your agency want to accomplish through resolution of this issue? What options would your agency like to consider, and why?)

3. A summary, by the requesting agency or another agency, of the various perspectives, focusing on the needs of each agency and finding commonalities among the agencies.
  4. A listing of the collective needs and concerns of the agencies (this list becomes a set of joint goals).
  5. A brief presentation, if appropriate, of relevant technical information.
  6. A brainstorming session, in which all the agencies list existing and additional options for consideration, taking into account the joint goals of the agencies.
  7. An identification of the option(s) that holds the most promise and discussion of how to improve upon and implement that option.
- Documentation of agreements reached at this and other levels will ensure that all agencies have the same understanding of the agreement and will facilitate implementation. A concise meeting summary should be prepared and distributed to participating agencies, which documents the decision(s) made and the rationale for the decision(s). A statement of the decision should be recorded on the Request for Issue Discussion form.
  - If the issue is resolved, this will be noted on the Request for Issue Discussion form, including a statement of the decision and the rationale for that decision.
  - If the issue is not resolved, this will be noted on the Request for Issue Discussion form, including a statement of the issue that needs to be resolved. It would then be elevated to Level Two.

### Elevation to Level Two for Issue Resolution

Elevation, as described in these Dispute Resolution Procedures, refers to focused, informal discussion between interested agencies at higher levels of authority (Level Two). The goal of elevation is to move unresolved issues quickly up to the next level of decision making, where there is broader perspective and more authority. Keys to success in the elevation process are pre-defined Level Two participants for each agency, a clear articulation of the issue to be resolved, and exposure of the decision makers to the various perspectives of each of the participating agencies in order to create a complete picture of the issue. The setting is an informal process based on direct communication among the relevant agencies. An issue will be elevated to Level Two when:

- Any agency that has participated in the Level One intensified communication discussion of the issue believes that resolution at Level One is unlikely, or
- More than twenty days have passed since the submission of the Request for Issue Discussion and there has been no resolution of the issue, unless all the participating agencies agree to continue discussion within an agreed-to timeframe because resolution at Level One is likely, or
- The participating Level One representatives agree that the issue requires higher authority or policy perspective than is available at Level One (in which case, the agencies will skip Level One intensified communication but may meet to frame the issue for the Level Two

decision makers)

When any issue moves to Level Two, SCDOT or FHWA will convene a meeting of the Level Two decision makers within 20 calendar days of the request. Each agency will prepare and exchange with the other participating agencies a brief paper that describes the issue, background information, needs and concerns, and options from their perspective. The Level Two decision makers will meet, discuss the issue, and make a decision within 15 calendar days of their initial meeting. The Level Two decision makers may schedule a joint briefing by all the relevant agencies. As soon as decisions are reached, written statements of the decision(s), including the rationale for the decision, will be prepared and distributed to the participating agencies. Agencies will consider the findings of this process in making decisions.

Any issue not resolved by Level Two will be referred to the highest state and regional officials of each agency (Level Three). This will be the final arbiter of unresolved issues.

Designated Agency Representatives for Level One and Level Two

	<b>SCDOT</b>	<b>FHWA</b>	<b>USACE</b>
<b>Level One</b>	NEPA/Permitting Coordinator	Env. Protection Specialist/Coordinator	Branch Chief / SCDOT Liaison
<b>Level Two</b>	Director of Environmental Services	Project Delivery Team Leader/ADA	Regulatory Chief

	<b>USCG</b>	<b>USFWS</b>	<b>USEPA - NEPA</b>
<b>Level One</b>	Agency Representative	Agency Representative	NEPA Officer
<b>Level Two</b>	Director	Field Supervisor	NEPA Office Chief

	<b>USEPA -Permitting</b>	<b>NMFS – Essential Fish Habitat</b>	<b>NMFS – ESA/MMPA</b>
<b>Level One</b>	Permitting Officer	Fisheries Biologist	Ecologist
<b>Level Two</b>	404 Office Chief	Chief	Chief

	<b>SCDAH</b>	<b>SCDHEC</b>	<b>SCDHEC-OCRM</b>
<b>Level One</b>	SCDOT Liaison	Agency Representative	Agency Representative
<b>Level Two</b>	Deputy SHPO	Director of Water Quality Division	Director

	<b>SCDNR</b>	<b>SCPRT</b>	<b>Native American Tribes TBD</b>
<b>Level One</b>	Project Manager	Deputy Director	THPO
<b>Level Two</b>	Env. Program Director	Agency Director	THPO



## TEMPLATE

### Request for Issue Discussion at Level One

Requestor's Name/Agency:

Issues(s) – Specific statement of each issue that needs to be resolved or decided:  
(no more than one short paragraph per issue)

Statement of need or concern of requestor's agency, related to the issue(s):

Solution proposed by requestor's agency and statement of why this solution is important to that agency:

Potentially interested agencies:  
(Requestor will send this form to each of the listed agencies and will send a copy to agencies)

**Proposed Discussion Forum -**

Type of forum (meeting/conference call/site visit):

Location:

Proposed date/time:

Participants:

Contact and date for RSVP:

The information below will be filled out following the discussion forum. The completed form will then be sent to the Level Two representatives of all the interested parties and a copy will be sent to the agencies.

**Outcome:**

Issue was resolved.

Decision:

Rationale for the decision:

Issue was not resolved.

Statement of the Issue to be elevated:

Comments:



APPENDIX B  
Notice of Intent

## PROCEDURAL SCHEDULE

October 10, 2019 .....	Motion for Protective Order and Motion for Establishment of Procedural Schedule filed.
October 11, 2019 .....	Application (amended) filed.
November 8, 2019 .....	Board notice of acceptance of application served and published in the <b>Federal Register</b> .
November 25, 2019 .....	Notices of intent to participate in this proceeding due.
December 9, 2019 .....	All comments, protests, requests for conditions, and any other evidence and argument in opposition to the application, including filings of DOJ and DOT, due.
January 8, 2020 .....	Responses to comments, protests, requests for conditions, and other opposition due. Rebuttal in support of the application due.
February 21, 2020 .....	Date by which a final decision will be served.
March 22, 2020. <sup>7</sup> .....	Date by which a final decision will become effective.

*It is ordered:*

1. The application is accepted for consideration.

2. The parties to this proceeding must comply with the procedural schedule adopted by the Board in this proceeding as shown in this decision. The parties to this proceeding must comply with the procedural requirements described in this decision.

3. This decision is effective on November 8, 2019.

Decided: November 4, 2019.

By the Board, Board Members Begeman, Fuchs, and Oberman.

**Kenyatta Clay,**  
Clearance Clerk.

[FR Doc. 2019-24438 Filed 11-7-19; 8:45 am]

**BILLING CODE 4915-01-P**

**DEPARTMENT OF TRANSPORTATION****Federal Aviation Administration****Notice of Release of Land Affecting Federal Grant Assurance Obligations at Tucson International Airport, Tucson, Pima County, Arizona**

**AGENCY:** Federal Aviation Administration, DOT.

**ACTION:** Notice of request to release airport land.

**SUMMARY:** The Federal Aviation Administration (FAA) proposes to rule and invites public comment for the release of approximately 297 acres of airport land, otherwise known as Parcel H, at Tucson International Airport (TUS), Tucson, Pima County, Arizona from the aeronautical use provisions of the Grant Agreement Assurances since the land is not needed for airport purposes. The land for proposed release consists of two parcels along the southern boundary of the abandoned Hughes Access Road, adjacent to the main airport airfield sand campus, and a portion of property which is used by Aerospace Parkway. The land will be

sold to the City of Tucson, to accommodate future expansion of a public roadway, and to permit future compatible development adjacent to United States Air Force Plant 44. The airport will be compensated for the fair market value of the land. The use of the land for a roadway and industrial development represents a compatible land use that will not interfere with the airport or its operation, thereby protecting the interests of civil aviation.

**DATES:** Comments must be received on or before December 9, 2019.

**FOR FURTHER INFORMATION CONTACT:**

Comments on the request may be mailed or delivered to the FAA at the following address: Mr. Mike N. Williams, Manager, Phoenix Airports District Office, **Federal Register** Comment, Federal Aviation Administration, Phoenix Airports District Office, 3800 N. Central Avenue, Suite 1025, Phoenix, Arizona 85012. In addition, one copy of the comment submitted to the FAA must be mailed or delivered to Ms. Danette Bewley, Interim President/CEO, Tucson Airport Authority, 7200 S. Tucson Boulevard, Suite 300, Tucson, Arizona 85756.

**SUPPLEMENTARY INFORMATION:** In accordance with the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR 21), Public Law 10-181 (Apr. 5, 2000; 114 Stat. 61), this notice must be published in the **Federal Register** 30 days before the DOT Secretary may waive any condition imposed on a federally obligated airport by surplus property conveyance deeds or grant agreements.

The following is a brief overview of the request:

The Tucson Airport Authority (TAA) requested a release from the provisions of the Grant Agreement Assurances to permit the disposal of approximately 297 acres of land, otherwise known as Parcel H, at Tucson International Airport, Tucson, Pima County, Arizona to permit the expansion of a public road (Aerospace Parkway), and to permit future compatible development adjacent to United States Air Force Plant 44. The Tucson Airport Authority will sell the

land, obligated by Airport Improvement Program grants, and Passenger Facility Charge funding. In return, TAA will be compensated for the fair market value for the property. An Environmental Impact Statement was completed for Parcel H, and a Record of Decision executed on November 28, 2018. The proposed use of the land is a compatible land use that will not interfere with or impede the operations and development of the airport. Based on the benefits of fair compensation and enhanced public safety, the interests of civil aviation will be properly served.

Issued in El Segundo, California, on November 4, 2019.

Original signed by

**Brian Q. Armstrong,**

Manager, Safety and Standards Branch, Airports Division, Western-Pacific Region.

[FR Doc. 2019-24452 Filed 11-7-19; 8:45 am]

**BILLING CODE 4910-13-P**

**DEPARTMENT OF TRANSPORTATION****Federal Highway Administration****Environmental Impact Statement: Charleston County, South Carolina; Notice of Intent**

**AGENCY:** Federal Highway Administration (FHWA), DOT.

**ACTION:** Notice of intent to prepare an Environmental Impact Statement (EIS).

**SUMMARY:** The FHWA is issuing this notice of intent to advise the public that an Environmental Impact Statement will be prepared for a proposed highway project in Charleston County, South Carolina.

**FOR FURTHER INFORMATION CONTACT:**

Emily O. Lawton, Division Administrator, Federal Highway Administration, Strom Thurmond Federal Building, 1835 Assembly Street, Suite 1270, Columbia, South Carolina 29201, Telephone: (803) 765-5411, Email: [emily.lawton@dot.gov](mailto:emily.lawton@dot.gov).

**SUPPLEMENTARY INFORMATION:** The Federal Highway Administration (FHWA), in cooperation with the South

<sup>7</sup> The final decision will become effective 30 days after it is served.

Carolina Department of Transportation (SCDOT), will be preparing an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The FHWA intends to issue a single Final EIS and Record of Decision (ROD) document pursuant to the FAST Act Section 1311 requirements, unless FHWA determines statutory criteria or practicability considerations preclude issuance of a combined document.

The I-526 and I-26 System-to-System interchange is a vital local connection, linking downtown Charleston, Summerville, West Ashley, and Mount Pleasant. I-26 links the Charleston area with the other major cities to the west like Columbia, Spartanburg, and Asheville, North Carolina, as well as with I-95, I-77, I-20, I-85, I-40, and I-81. In addition, I-526 provides the only freeway access to two important port terminals, the North Charleston terminal, and the Wando Welch terminal. Thus, I-526 is an important part of a network for transporting freight and commercial goods to and from the Port of Charleston and throughout the region.

The Charleston region's population growth is three times the average of the United States. With the increased population growth, traffic congestion is anticipated to worsen over the next 20 years. SCDOT has currently ranked I-526 between I-26 and Virginia Avenue as the most congested interstate segment in South Carolina. In addition, I-526 between I-26 and Paul Cantrell Boulevard is currently ranked among the top ten of South Carolina's most congested interstate corridors. Improvements to the corridor are considered necessary to provide for the existing and projected traffic demand and to address the existing and projected future congestion.

Alternatives under consideration will evaluate mainline widening options along with several interchange improvements at I-26/I-526, North Rhett Avenue, and Rivers Avenue in addition to the no-build alternative. The alternatives will be refined during the NEPA scoping process in consideration of agency and public comments received.

The FHWA and SCDOT are seeking input as part of the scoping process to

assist in identifying issues relative to this project and potential solutions. Letters describing the proposed action and soliciting comments are being sent to appropriate Federal, State, and local agencies, and to private organizations and citizens who have previously expressed an interest in this project. Agency coordination will involve monthly meetings and a public information meeting will be held on November 21, 2019 from 11:00 a.m. to 7:00 p.m. at the North Charleston Convention Center that will allow the public to comment on the scope of the EIS, the purpose and need, the alternatives under evaluation, environmental impacts to be considered, and potential mitigation measures.

Further agency and community meetings will be held as the project is developed, and a public hearing will be conducted after the approval of the draft EIS. Public notice will be given of the time and place of the meetings and hearing. Meeting dates and locations will be posted on the project's website at <https://www.526lowcountrycorridor.com/west/> and all known interested parties and the public will be notified via postcards.

To ensure that the full range of issues related to this proposed action are addressed and all significant issues identified, comments are invited from all interested parties. Comments or questions concerning this proposed action and the EIS should be directed to the FHWA at the address provided above no later than January 4, 2020.

(Catalog of Federal Domestic Assistance Program Number 20.205, Highway Planning and Construction. The regulations implementing Executive Order 12372 regarding intergovernmental consultation on Federal programs and activities apply to this program.)

Dated: November 1, 2019.

**Yolonda Jordan,**

*Assistant Division Administrator, Columbia, South Carolina.*

[FR Doc. 2019-24327 Filed 11-7-19; 8:45 am]

**BILLING CODE 4910-22-P**

## DEPARTMENT OF THE TREASURY

### Agency Information Collection Activities; Submission for OMB Review; Comment Request; Multiple Fiscal Service Information Collection Requests

**AGENCY:** Departmental Offices, U.S. Department of the Treasury.

**ACTION:** Notice.

**SUMMARY:** The Department of the Treasury will submit the following information collection requests to the Office of Management and Budget (OMB) for review and clearance in accordance with the Paperwork Reduction Act of 1995, on or after the date of publication of this notice. The public is invited to submit comments on these requests.

**DATES:** Comments should be received on or before December 9, 2019 to be assured of consideration.

**ADDRESSES:** Send comments regarding the burden estimate, or any other aspect of the information collection, including suggestions for reducing the burden, to (1) Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for Treasury, New Executive Office Building, Room 10235, Washington, DC 20503, or email at [OIRA\\_Submission@OMB.EOP.gov](mailto:OIRA_Submission@OMB.EOP.gov) and (2) Treasury PRA Clearance Officer, 1750 Pennsylvania Ave. NW, Suite 8100, Washington, DC 20220, or email at [PRA@treasury.gov](mailto:PRA@treasury.gov).

**FOR FURTHER INFORMATION CONTACT:** Copies of the submissions may be obtained from Spencer W. Clark by emailing [PRA@treasury.gov](mailto:PRA@treasury.gov), calling (202) 927-5331, or viewing the entire information collection request at [www.reginfo.gov](http://www.reginfo.gov).

#### SUPPLEMENTARY INFORMATION:

##### Bureau of the Fiscal Service (BFS)

*Title:* Pools and Associations—Annual Letter.

*OMB Control Number:* 1530-0007.

*Type of Review:* Reinstatement of a previously approved collection.

*Description:* Information collected determines acceptable percent for each pool and association Treasury Certified companies are given credit for on Treasury Schedule F for authorized ceded reinsurance in determining the companies' underwriting limitations.

*Form:* None.

*Affected Public:* Businesses or other for-profits.

*Estimated Number of Respondents:* 84.

*Frequency of Response:* On Occasion.  
*Estimated Total Number of Annual Responses:* 84.

*Estimated Time per Response:* 1.5 hours.

*Estimated Total Annual Burden Hours:* 126.

*Title:* FS Form 2888—Application Form for U.S. Department of Treasury Accountable Official Stored Value Card (SVC).

*OMB Control Number:* 1530-0020.

*Type of Review:* Extension without change of a currently approved collection.



## APPENDIX C

Cooperating & Participating Agency Letters



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

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Blair Williams  
Critical Area Permitting Section Manager  
SCDHEC-OCRM  
1362 McMillan Ave., Suite 400  
Charleston, SC 29045

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Williams:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

1. Agency Coordination Plan (ACP)
2. Purpose & Need Statement
3. Permitting Timetable

While Cooperating Agencies are the only agencies required to concur or not concur, we are also extending the opportunity to Participating Agencies. Participating agencies can either concur, not concur, or abstain.

These documents were previously provided to you on March 1, 2019. In addition, this information was discussed at the Agency Coordination Effort (ACE) meeting on March 14, 2019, and at the subsequent monthly agency meeting held on April 23, 2019. Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and to continue coordination throughout

the project development and NEPA process to ensure that you have the information your agency needs to make comments on the EIS. **Please provide your written concurrence to this office within 30 days.** If you would like to discuss these items in more detail prior to the deadline, please let us know by Friday, June 7, 2019, and we will hold the June 12, 2019 monthly agency meeting for that discussion. If no discussions are needed, the June 12, 2019 meeting will not be held. All agencies will be notified regarding the status of the June meeting.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Ms. Michelle Herrell at 803-765-5460 or by email at [michelle.herrell@dot.gov](mailto:michelle.herrell@dot.gov) or Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L  
HERRELL  
Date: 2019.05.30  
09:27:41 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Christ Stout, SCDHEC-OCRM Coastal Zone Consistency Section Manager  
Chuck Hightower, SCDHEC Water Quality Permitting & Certification Manager  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator





U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Chuck Hightower  
Water Quality Permitting & Certification Manager  
SC Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Hightower:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

1. Agency Coordination Plan (ACP)
2. Purpose & Need Statement
3. Permitting Timetable

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These documents were previously provided to you on March 1, 2019. In addition, this information was discussed at the Agency Coordination Effort (ACE) meeting on March 14, 2019, and at the subsequent monthly agency meeting held on April 23, 2019. Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and to continue coordination throughout

the project development and NEPA process to ensure that you have the information your agency needs to make comments on the EIS. **Please provide your written concurrence to this office within 30 days.** If you would like to discuss these items in more detail prior to the deadline, please let us know by Friday, June 7, 2019, and we will hold the June 12, 2019 monthly agency meeting for that discussion. If no discussions are needed, the June 12, 2019 meeting will not be held. All agencies will be notified regarding the status of the June meeting.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Ms. Michelle Herrell at 803-765-5460 or by email at [michelle.herrell@dot.gov](mailto:michelle.herrell@dot.gov) or Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L HERRELL  
Date: 2019.05.30  
09:25:56 -04'00'

(for) Emily O. Lawton  
Division Administrator

#### Enclosures

ec: Blair Williams, SCDHEC-OCRM Critical Area Permitting Section Manager  
Christ Stout, SCDHEC-OCRM Coastal Zone Consistency Section Manager  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Dr. Roy E. Crabtree  
Regional Administrator SE Regional Office  
NOAA Fisheries  
263 13<sup>th</sup> Avenue South  
St. Petersburg, FL 33701

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Dr. Crabtree:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

1. Agency Coordination Plan (ACP)
2. Purpose & Need Statement
3. Permitting Timetable

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If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Ms. Michelle Herrell at 803-765-5460 or by email at [michelle.herrell@dot.gov](mailto:michelle.herrell@dot.gov) or Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**MICHELLE  
L HERRELL** Digitally signed by  
MICHELLE L  
HERRELL  
Date: 2019.05.30  
09:29:55 -04'00'

(for) Emily O. Lawton  
Division Administrator

#### Enclosures

ec: Cynthia Cooksey, NOAA Fisheries Charleston  
Kelly Shotts, NOAA Fisheries SE Regional Office  
Andrew Herndon, NOAA Fisheries  
Richard Fickley, NOAA Fisheries SE Regional Office  
Noah Silverman, NOAA Fisheries SE Regional Office  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



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

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Justin Hancock  
Director, Recreation, Grants and Policy  
SC Department of Parks, Recreation and Tourism  
1205 Pendleton Street  
Columbia, SC 29201

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Hancock:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

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2. Purpose & Need Statement
3. Permitting Timetable

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Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L HERRELL  
Date: 2019.05.30  
09:30:39 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



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

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Joseph Wilkerson  
Review Coordinator for Transportation Projects  
SC Department of Archives and History  
8301 Parklane Road  
Columbia, SC 29223

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Wilkerson:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

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3. Permitting Timetable

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Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L HERRELL  
Date: 2019.05.30  
09:31:56 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator





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

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Amanda Heath  
Chief, Special Projects Branch  
Charleston District  
U.S. Army Corps of Engineers  
ATTN: Mr. Christopher Mims  
69A Hagood Avenue  
Charleston, SC 29403

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Heath:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

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Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L HERRELL  
Date: 2019.05.30  
09:32:38 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Christopher Mims, USACE Charleston District  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



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

**South Carolina**

May 30, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Randall D. Overton  
Chief, Permits Division  
U.S. Coast Guard, District 7  
909 SE 1<sup>st</sup> Avenue, Suite 432  
Miami, FL 33131

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Overton:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

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the project development and NEPA process to ensure that you have the information your agency needs to make comments on the EIS. **Please provide your written concurrence to this office within 30 days.** If you would like to discuss these items in more detail prior to the deadline, please let us know by Friday, June 7, 2019, and we will hold the June 12, 2019 monthly agency meeting for that discussion. If no discussions are needed, the June 12, 2019 meeting will not be held. All agencies will be notified regarding the status of the June meeting.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Ms. Michelle Herrell at 803-765-5460 or by email at [michelle.herrell@dot.gov](mailto:michelle.herrell@dot.gov) or Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**MICHELLE**  
**L HERRELL**

Digitally signed by  
MICHELLE L HERRELL  
Date: 2019.05.30  
09:33:30 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



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

**South Carolina**

May 31, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Alya Singh-White  
Life Scientist/Biologist  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW 9T25  
Atlanta, GA 30303-8960

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Singh-White:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

1. Agency Coordination Plan (ACP)
2. Purpose & Need Statement
3. Permitting Timetable

While Cooperating Agencies are the only agencies required to concur or not concur, we are also extending the opportunity to Participating Agencies. Participating agencies can either concur, not concur, or abstain.

These documents were previously provided to you on March 1, 2019. In addition, this information was discussed at the Agency Coordination Effort (ACE) meeting on March 14, 2019, and at the subsequent monthly agency meeting held on April 23, 2019. Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and to continue coordination throughout

the project development and NEPA process to ensure that you have the information your agency needs to make comments on the EIS. **Please provide your written concurrence to this office within 30 days.** If you would like to discuss these items in more detail prior to the deadline, please let us know by Friday, June 7, 2019, and we will hold the June 12, 2019 monthly agency meeting for that discussion. If no discussions are needed, the June 12, 2019 meeting will not be held. All agencies will be notified regarding the status of the June meeting.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Ms. Michelle Herrell at 803-765-5460 or by email at [michelle.herrell@dot.gov](mailto:michelle.herrell@dot.gov) or Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane  
Belcher**

Digitally signed by J.  
Shane Belcher  
Date: 2019.05.31  
09:26:14 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator



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

**South Carolina**

May 31, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Mark Caldwell  
Deputy Field Supervisor  
U.S. Fish & Wildlife Services  
176 Croghan Spur Road, Suite 200  
Charleston, SC 29407

**Subject:** Request for Concurrence on Agency Coordination Plan, Purpose & Need Statement, and Permitting Timetable for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Caldwell:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for written concurrence on the following three enclosed documents:

1. Agency Coordination Plan (ACP)
2. Purpose & Need Statement
3. Permitting Timetable

While Cooperating Agencies are the only agencies required to concur or not concur, we are also extending the opportunity to Participating Agencies. Participating agencies can either concur, not concur, or abstain.

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Sincerely,

**J. Shane  
Belcher**  Digitally signed by J.  
Shane Belcher  
Date: 2019.05.31  
09:25:22 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator





U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Heather Preston  
Director, Water Quality  
SC Department of Health & Environmental Control  
ATTN: Chuck Hightower and Blair Williams  
2600 Bull Street  
Columbia, SC 29201

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Preston:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative

were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:10:15 -04'00'

(for) Emily O. Lawton  
Division Administrator

#### Enclosures

ec: Chuck Hightower, SCDHEC Water Quality Permitting & Certification Mgr.  
Blair Williams, SCDHEC-OCRM Critical Area Permitting Mgr.  
Chris Stout, SCDHEC-OCRM Coastal Zone Consistency Section Mgr.  
Josh Hoke, SCDHEC-OCRM Critical Area Permitting Project Mgr.  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Dr. Roy E. Crabtree  
Regional Administrator SERO  
NOAA Fisheries  
ATTN: Mr. Noah Silverman  
263 13<sup>th</sup> Avenue South  
St. Petersburg, FL 33701

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Dr. Crabtree:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:06:35 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer  
Cynthia Cooksey, NOAA Fisheries Charleston  
Andrew Herndon, NOAA Fisheries SERO  
Kelly Shotts, NOAA Fisheries SERO  
Richard Fickley, NOAA Fisheries SERO



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

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Robert Vogel  
Regional Director (Southeast)  
National Parks Service  
ATTN: Ms. Alexis John  
100 Alabama St., SW  
1924 Building  
Atlanta, GA 30303

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Vogel:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the

information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:05:03  
-04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Susan Davis  
Coastal Environmental Coordinator  
SC Department of Natural Resources  
217 Fort Johnson Road  
Charleston, SC 29412-9110

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Davis:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane Belcher**

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:08:50 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Lorianne Riggan, SCDNR Director of Environmental Programs  
Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer





U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Justin Hancock  
Director, Recreation, Grants and Policy  
SC Department of Parks, Recreation and Tourism  
1205 Pendleton Street  
Columbia, SC 29201

Subject: Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Hancock:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

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Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:03:50 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Elizabeth Johnson  
Deputy SHPO  
SC Department of Archives and History  
8301 Parklane Road  
Columbia, SC 29223

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Johnson:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

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Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates

your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane Belcher**

Digitally signed by J. Shane  
Belcher

Date: 2020.06.04 11:02:30 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Amanda Heath  
Chief, Special Projects Branch  
Charleston District  
U.S. Army Corps of Engineers  
ATTN: Dr. Richard L. Darden  
69A Hagood Avenue  
Charleston, SC 29403

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Heath:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the

information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:01:25 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Randall D. Overton  
Chief, Permits Division  
U.S. Coast Guard, District 7  
909 SE 1<sup>st</sup> Avenue, Suite 432  
Miami, FL 33131

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Overton:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.


Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane  
Belcher**

 Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 10:59:37  
-04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer





U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2019

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Alya Singh-White  
Life Scientist/Biologist  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW 9T25  
Atlanta, GA 30303-8960

Subject: Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Singh-White:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

Since this is a major infrastructure project that is starting after August 15, 2017, it is adhering to the One Federal Decision guidance and is being tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. "Concurrence" for purposes of the MOU means confirmation by the agency that the information is sufficient for that stage, and the environmental review process may proceed to the next stage of the NEPA process. The proposed preferred alternative was presented at the monthly agency meeting held on May 14, 2020. A presentation outlining the decision-making process for the preferred alternative and a Google Earth kmz file depicting the proposed preferred alternative were provided for review in advance of and after the meeting. The presentation along with the kmz file are enclosed for your reference.


Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane  
Belcher**

(for) Emily O. Lawton  
Division Administrator

 Digitally signed by J. Shane  
Belcher  
Date: 2020.06.04 11:07:47  
-04'00'

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

June 3, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Mark Caldwell  
Deputy Field Supervisor  
U.S. Fish & Wildlife Services  
176 Croghan Spur Road, Suite 200  
Charleston, SC 29407

**Subject:** Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Caldwell:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Impact Statement (EIS) for the I-526 Lowcountry Corridor West Improvements Project. The proposed project would make improvements to the I-526 corridor from Paul Cantrell Boulevard to Virginia Avenue in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

Reasonable alternatives for detailed study in the Draft EIS were developed and presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop. The Reasonable Alternatives were then further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020.

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Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates

your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternative. This will allow FHWA to work out any issues with your agency prior to moving forward.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

**J. Shane Belcher**

Digitally signed by J. Shane  
Belcher

Date: 2020.06.04 10:58:21 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Mr. Chad Long, SCDOT Director of Environmental Services  
Ms. Joy Riley, SCDOT Program Manager  
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator  
Mr. Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Mr. Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Blair Williams  
Critical Area Permitting Mgr.  
SCDHEC-OCRM  
1362 McMillan Ave., Suite 400  
Charleston, SC 29405

Subject: Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Williams:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:38:59 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

March 16, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Heather Preston  
Director, Water Quality  
SC Department of Health & Environmental Control  
ATTN: Chuck Hightower  
2600 Bull Street  
Columbia, SC 29201

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Preston:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526



mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

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If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.16 10:28:28 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Dr. Roy E. Crabtree  
Regional Administrator SERO  
NOAA Fisheries  
ATTN: Mr. Noah Silverman  
263 13<sup>th</sup> Avenue South  
St. Petersburg, FL 33701

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Dr. Crabtree:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526

mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

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- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:01:10 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Robert Vogel  
Regional Director (Southeast)  
National Parks Service  
ATTN: Ms. Alexis John  
100 Alabama St., SW  
1924 Building  
Atlanta, GA 30303

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Vogel:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements

would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:01:41 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer





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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Susan Davis  
Coastal Environmental Coordinator  
SC Department of Natural Resources  
217 Fort Johnson Road  
Charleston, SC 29412-9110

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Davis:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/I-526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

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If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 16:59:57 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Justin Hancock  
Director, Recreation, Grants and Policy  
SC Department of Parks, Recreation and Tourism  
1205 Pendleton Street  
Columbia, SC 29201

Subject: Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Hancock:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/I-526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher  Digitally signed by J. Shane Belcher  
Date: 2020.03.12 17:02:17 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Joseph Wilkinson  
Review Coordinator for Transportation Projects  
SC Department of Archives and History  
8301 Parklane Road  
Columbia, SC 29223

Subject: Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Wilkinson:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

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If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:45:32 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures



ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Amanda Heath  
Chief, Special Projects Branch  
Charleston District  
U.S. Army Corps of Engineers  
ATTN: Mr. Christopher Mims  
69A Hagood Avenue  
Charleston, SC 29403

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Heath:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements

would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

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- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

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Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:03:23 -04'00'

(for) Emily O. Lawton  
Division Administrator

#### Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Randall D. Overton  
Chief, Permits Division  
U.S. Coast Guard, District 7  
909 SE 1<sup>st</sup> Avenue, Suite 432  
Miami, FL 33131

**Subject:** Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Overton:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

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The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526

mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

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Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:03:57 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Ms. Alya Singh-White  
Life Scientist/Biologist  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW 9T25  
Atlanta, GA 30303-8960

Subject: Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Ms. Singh-White:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.



Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

- North Rhett Avenue: extensive queues currently occur back onto the interstate
- Rivers Avenue: this interchange is closely spaced to the I-26/526 interchange and has an effect on its operation
- Paul Cantrell Boulevard: the intersection of Paul Cantrell and Magwood causes traffic to queue back on to the interstate during PM peak hour.

Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2020.03.12 17:00:33 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Chad Long, SCDOT Director of Environmental Services  
Joy Riley, SCDOT Program Manager  
David Kelly, SCDOT RPG 1 NEPA Coordinator  
Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Jim Martin, FHWA Major Projects Engineer



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

**South Carolina**

March 12, 2020

1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201  
803-765-5411  
803-253-3989

In Reply Refer To:  
HDA-SC

Mr. Mark Caldwell  
Deputy Field Supervisor  
U.S. Fish & Wildlife Services  
176 Croghan Spur Road, Suite 200  
Charleston, SC 29407

Subject: Request for Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Caldwell:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), plans to prepare an Environmental Impact Statement (EIS) for the I-526 West Lowcountry Corridor Improvements Project. The proposed project would make improvements to the I-526 corridor from Virginia Avenue to Paul Cantrell Boulevard in Charleston County, South Carolina. The purpose of the proposed project is to increase capacity and improve operations at the I-26/526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard. The Ashley River bridge crossing would be widened to accommodate the improvements on the I-526 mainline.

In 2013, SCDOT commissioned a study to develop a long-range plan to address the existing and future congestion and operational issues of the Interstate 526 (I-526) corridor in Charleston County. The purpose of the study was to look at potential improvement strategies for the corridor in a holistic manner and not just wholesale widening. Four categories of improvement strategies were considered, consisting of: Travel Demand Management (TDM) strategies, Modal strategies including Transit and Freight improvements, Traffic Operations strategies, and Capacity Improvement strategies.

The study concluded that capacity improvements along the I-526 corridor could be pushed back 5-10 years with implementation of all TDM and Modal strategies but capacity improvements would still be necessary. Project grouping strategies included the widening of I-526 from Paul Cantrell Boulevard to Rivers Avenue, as well as improving the I-26/I-526 interchange.

As part of the Lowcountry Corridor West project, SCDOT conducted a traffic analysis to determine the level of capacity improvements that were necessary to fulfill the purpose and need for the project using a design year of 2050. Two mainline widening alternatives (6-lane and 8-lane) were evaluated as part of the study (see attachment). The analysis shows that the 8-lane widening alternative would result in the greatest improvement to traffic flow along the I-526 mainline. Based on these results, SCDOT is proposing to carry the 8-lane mainline widening alternative forward for detailed analysis in the EIS.

Traffic analysis conducted for the Lowcountry Corridor West project has also concluded that improvements to the I-26/I-526 interchange and the following service interchanges are needed to improve operations on the interstate:

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Based on the results of traffic analysis, SCDOT is proposing to evaluate improvements at the following interchanges for detailed evaluation in the EIS: I-26/I-526, North Rhett Avenue, Rivers Avenue, and Paul Cantrell Boulevard.

Since this is a major infrastructure project that is starting after August 15, 2017, it will adhere to the One Federal Decision guidance and will be tracked on the federal permitting dashboard. Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, we are asking for concurrence on the proposed alternatives to be carried forward for detailed analysis in the EIS. The proposed alternatives were presented at an agency alternatives workshop held on February 12, 2020 and Google Earth kmz files were provided for agency review via e-mail. The workshop presentation along with the kmz files are enclosed for your reference.

Per the One Federal Decision MOU, we want to ensure that your agency's needs are being met and that continued coordination throughout the project development and NEPA process facilitates your agency's ability to make timely and informed comments on the EIS. **Per the One Federal Decision MOU, please provide your response to this office within 10 business days, via electronic mail to Mr. J. Shane Belcher at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).** We ask that you contact FHWA as early as possible if you find that your agency will not be able to concur with or has issues with the proposed alternatives. This will allow FHWA to work out any issues with your agency prior to moving forward with detailed analysis.

If you have any questions or would like to discuss in more detail the project or your agency's roles and responsibilities during the preparation of the EIS, please contact Mr. J. Shane Belcher at 803-253-3187 or by email at [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov).

Sincerely,

J. Shane Belcher  Digitally signed by J. Shane Belcher  
Date: 2020.03.12 17:04:33 -04'00'

(for) Emily O. Lawton  
Division Administrator

Enclosures

ec: Mr. Chad Long, SCDOT Director of Environmental Services  
Ms. Joy Riley, SCDOT Program Manager  
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator  
Mr. Will McGoldrick, SCDOT Design Build Environmental Coordinator  
Mr. Jim Martin, FHWA Major Projects Engineer



**UNITED STATES DEPARTMENT OF COMMERCE**

National Oceanic and Atmospheric Administration

**NATIONAL MARINE FISHERIES SERVICE**

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

04/26/2019

F:SER/NS

Emily O. Lawton  
Division Administrator  
US Dept of Transportation  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201

Attention: Michelle Herrell, and Shane Belcher

Dear Ms. Lawton:

NOAA's National Marine Fisheries Service (NMFS) has received your letter dated April 02, 2019, requesting our participation as a participating agency on the 1-526 West Lowcountry Corridor Improvements project, pursuant to section 6002 of the Fixing America's Surface Transportation Act. Given our special expertise and jurisdiction by law under the Endangered Species Act, Marine Mammal Protection Act, and Magnuson Stevens Act, NMFS agrees to serve as a participating agency for this project. Due to staffing and travel constraints, our participation may be limited to our review and comment on draft National Environmental Policy Act documents, teleconferences, and occasional travel to meetings.

We appreciate your invitation to serve as a participating agency for the 1-526 West Lowcountry Corridor Improvements project. Please direct project correspondence related to habitat impacts and/or Essential Fish Habitat consultation to Cynthia Cooksey at 219 Fort Johnson Rd., Charleston, SC 29412; by telephone at (843) 460-9922, or by e-mail at [cynthia.cooksey@noaa.gov](mailto:cynthia.cooksey@noaa.gov). Please direct project correspondence related to sturgeon and/or Endangered Species Act coordination to Andy Herndon, at the letterhead address; by telephone (727) 824-5312, or by email at [Andrew.herndon@noaa.gov](mailto:Andrew.herndon@noaa.gov). Please direct project correspondence related to dolphins and/or the Marine Mammal Protection Act to Jaclyn Daly, 1315 East-West Hwy, Silver Spring, MD 20910; by telephone at (301) 427-8438, or by email at [Jaclyn.daly@noaa.gov](mailto:Jaclyn.daly@noaa.gov).

Sincerely,

CRABTREE.ROY. E.DR.1365849559  
Digitally signed by  
CRABTREE.ROY.E.DR.1365849  
559  
Date: 2019.04.26 12:53:07 -04'00'

Roy E. Crabtree, Ph.D.  
Regional Administrator





**UNITED STATES DEPARTMENT OF COMMERCE**

National Oceanic and Atmospheric Administration

**NATIONAL MARINE FISHERIES SERVICE**

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

cc:

GCERC, Renshaw, Lipsy

F/SER, Strelcheck, Blough, Silverman,

F/SER3, Bernhart,

F/SER4, Fay, Dale

F/SER45, Wilber, Cooksey





**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**  
Southeast Regional Office  
263 13<sup>th</sup> Avenue South  
St. Petersburg, Florida 33701-5505  
<https://www.fisheries.noaa.gov/region/southeast>

06/12/2020

F:SER/BR

Emily O. Lawton  
Division Administrator  
U.S. Department of Transportation  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201

Attention: J. Shane Belcher, Chad Long, Joy Riley, David Kelly, Will McGoldrick, Jim Martin

**Re: Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507**

Dear Ms. Lawton:

NOAA's National Marine Fisheries Service (NMFS) has received your letter dated June 3, 2020, requesting our concurrence pursuant to the One Federal Decision Memorandum of Understanding on the proposed preferred alternative to be carried forward for analysis in the EIS on the I-526 West Lowcountry Corridor Improvements Project. After reviewing the information, including details provided during inter-agency meetings and conference calls, we concur. However, if the project scope, and/or preferred alternative change, NMFS must be notified with sufficient time to review and comment on any changes.

Sincerely,

CRABTREE.ROY. E.DR.1365849559  
E.DR.1365849559  
Digitally signed by  
CRABTREE.ROY.E.DR.1365849  
559  
Date: 2020.06.12 11:31:02 -04'00'

Roy E. Crabtree, Ph.D.  
Regional Administrator

cc: NOAA: NOAA NEPA  
F: NMFS HQ NEPA  
F/SER: Strelcheck, Blough, Silverman, Rosegger  
F/SER3: Bernhart, Farmer, Herndon  
F/SER4: Fay, Dale, Wilber, Cooksey







**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**  
Southeast Regional Office  
263 13<sup>th</sup> Avenue South  
St. Petersburg, Florida 33701-5505  
<https://www.fisheries.noaa.gov/region/southeast>

03/23/2020

F:SER/NS

Emily O. Lawton  
Division Administrator  
US Department of Transportation  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, South Carolina 29201

Attention: J. Shane Belcher, Chad Long, Joy Riley, David Kelly, Will McGoldrick, Jim Martin

**Re: Request for Concurrence on the Proposed Alternatives to be carried forward for detailed evaluation for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507**

Dear Ms. Lawton:

NOAA's National Marine Fisheries Service (NMFS) has received your letter dated March 12, 2020, requesting our concurrence pursuant to the One Federal Decision Memorandum of Understanding on the alternatives to be carried forward for analysis in the EIS on the proposed on the proposed I-526 West Lowcountry Corridor Improvements Project. After reviewing the information you've provided, including details provided during inter-agency meetings and conference calls, we do not have any concerns with your range of alternatives, and as such we concur. If the project scope, and/or new alternatives are added then we would appreciate the opportunity to review those changes/additions.

Sincerely,

CRABTREE.ROY. E.DR.1365849559  
Digitally signed by  
CRABTREE.ROY.E.DR.1365849  
559  
Date: 2020.03.23 11:38:28 -04'00'

Roy E. Crabtree, Ph.D.  
Regional Administrator

cc: NOAA: NOAA NEPA  
F: NMFS HQ NEPA  
F/SER: Strelcheck, Blough, Silverman  
F/SER3: Bernhart, Shotts, Herndon  
F/SER4: Fay, Dale, Wilber, Cooksey





# United States Department of the Interior



## NATIONAL PARK SERVICE

Atlanta Federal Center  
1924 Building  
100 Alabama Street, SW  
Atlanta, GA 30303

IN REPLY REFER TO:  
8.B. (IR2-RPB)  
45-00691

Jeffrey Belcher  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, SC 29201

Dear Mr. Belcher:

This letter is in response to the correspondence dated June 3, 2020, from the Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT). In that correspondence you requested the National Park Service's (NPS) concurrence that the proposed preferred alternative be carried forward in the draft Environmental Impact Statement (EIS) for the proposed I-526 West Lowcountry Corridor Improvements in Charleston County, South Carolina (Federal Project Number P027507).

As per the guidelines set forth in the Fast 41/One Federal Decision Memorandum of Understanding (MOU) issued on April 9, 2018, the NPS has completed our review of the documentation provided in the monthly agency meeting held on May 14, 2020. We agree that the information is sufficient for this stage, and the environmental review process may proceed to the next stage of the National Environmental Policy Act (NEPA) process.

In accordance with our letter dated August 12, 2019, we continue to request that any potential impacts to areas under NPS jurisdiction or areas of expertise that are within the area of potential affect be addressed in the EIS. These areas include a Land and Water Conservation Fund (LWCF) site (Highland Terrace Park), a Federal Lands to Parks (FLP) site (Ralph M. Hendricks Park), and two Heritage Areas (Gullah Geechee Cultural Heritage Corridor and South Carolina National Heritage Corridor).

Thank you for the opportunity to review and provide comments. If you have questions or need additional information regarding LWCF, please contact Ms. Alexis H. John at (404) 507-5834 or at [alexis\\_john@nps.gov](mailto:alexis_john@nps.gov). If you have any other NPS questions or concerns, please feel free to contact Ms. Anita Barnett, Planning and Compliance Division, at (404) 507-5706 or [anita\\_barnett@nps.gov](mailto:anita_barnett@nps.gov).

Sincerely,

**KAREN CUCURULLO**

Digitally signed by KAREN  
CUCURULLO  
Date: 2020.06.18 17:55:14 -04'00'

Karen L. Cucurullo  
Acting Regional Director

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi  
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

cc:

Justin Hancock, Director, State Liaison Officer  
South Carolina Department of Parks, Recreation and Tourism

Anita Barnett, Planning and Compliance Division  
NPS Interior Region 2

# South Carolina Department of Natural Resources

PO Box 12559  
Charleston, SC 29422  
843.953.9003 Office  
843.953.9399 Fax  
[Daviss@dnr.sc.gov](mailto:Daviss@dnr.sc.gov)



Robert H. Boyles, Jr.  
Director  
Lorianne Riffin  
Director, Office of  
Environmental Programs

June 8, 2020

Mr. J. Shane Belcher  
USDOT  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, SC 29201

Re: Request for Concurrence on the Proposed Preferred Alternative to be Carried Forward for the Proposed I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507

Dear Mr. Belcher:

The SCDNR understands that a set of reasonable alternatives were developed for detailed study in the Draft EIS. These alternatives were presented to the cooperating and participating agencies in February 2020 during an agency alternatives workshop and further evaluated based on their ability to meet the project's Purpose and Need and project impacts. Concurrence or lack of objection on the Reasonable Alternatives was received from the cooperating and participating agencies in April 2020, including the SCDNR.

Based on the One Federal Decision Memorandum of Understanding (MOU) issued April 9, 2018, the SCDNR is providing concurrence on the proposed preferred alternative to be carried forward in the Draft EIS. After a thorough review, the SCDNR concurs that the proposed preferred alternative represents a reasonable alternative to be carried forward for detailed analysis in the EIS.

The SCDNR appreciates the opportunity to participate in the review of this project and provide comments. Please feel free to contact me as you deem necessary regarding this project. I can be reached by email at [daviss@dnr.sc.gov](mailto:daviss@dnr.sc.gov) or by phone at 843-953-9003.

Sincerely,

*Susan F. Davis*

Susan F. Davis  
Coastal Environmental Coordinator



**DEPARTMENT OF THE ARMY**  
CHARLESTON DISTRICT, CORPS OF ENGINEERS  
69A HAGOOD AVE  
CHARLESTON, SOUTH CAROLINA, 29403

26 April 2019

Regulatory Division

Ms. Emily O. Lawton  
Division Administrator  
Federal Highway Administration  
1835 Assembly Street, Suite 1270  
Columbia, SC 29201

Re: I-526 West Lowcountry Corridor Improvements Project Cooperating Agency  
Acceptance, Charleston County, South Carolina, Federal Project Number P027507

Dear Ms. Lawton:

The Federal Highway Administration (FHWA) has requested the U.S. Army Corps of Engineers, Charleston District (Corps), to participate as a cooperating agency in the preparation of an Environmental Impact Statement (EIS) for the I-526 West, Lowcountry Corridor Improvement project, in Charleston County, South Carolina. As stated in 40 CFR 1501.6, the FHWA as the lead federal action agency, may request any other agency having jurisdiction by law or special expertise with respect to an environmental issue to be a cooperating agency. In accordance with the above stated regulations, the Corps formally accepts your invitation to become a cooperating agency. As party to this cooperative effort, the Corps is willing to attend and participate in coordination meetings, to provide consultation on aspects of this project where we have legal oversight and expertise, and to review and provide comments on documents related to this project (alternatives considered, anticipated impacts, proposed mitigation, etc.).

The Corps applauds your effort to develop an EIS for this project that will satisfy both our jurisdictional responsibilities. However, we recognize some fundamental differences in the way our agencies conduct an environmental review. This difference is primarily due to the Corps' authority under Section 404 of the Clean Water Act. The Section 404(b)(1) Guidelines require the Corps to define the project's basic and overall purpose, determine if the project is water dependent, and conduct an analysis of practicable alternatives. Therefore, we feel it paramount that FHWA, SCDOT, and the Corps continue meeting to ensure understanding of each other's missions and statutory requirements, and ultimately develop EIS documents addressing all of our jurisdictional responsibilities.

In closing, we appreciate your invitation and look forward to our continued collaboration with you on this project. Please be advised our concurrence is based upon the most current information available. If new information becomes available that requires further consideration, the concurrence may in turn be affected. Though we anticipate our participation and concurrence on this project will help facilitate the permit process, it can in

no way guarantee permit issuance. If you have any questions, please contact the Project Manager, Christopher Mims, at [Christopher.D.Mims@usace.army.mil](mailto:Christopher.D.Mims@usace.army.mil) or 843-329-8154.

Respectfully,



Digitally signed by Travis G.  
Hughes  
Date: 2019.04.30 13:30:44 -04'00'

for: **Jeffrey S. Palazzini**  
Lieutenant Colonel, U.S. Army  
Commander and District Engineer

**Travis G. Hughes**  
Chief, Regulatory Division

Copy furnished:

Mr. Chad Long  
Director, Environmental Services  
South Carolina Department of Transportation  
P.O. Box 191  
Columbia, SC 29202-0191



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHARLESTON DISTRICT  
69A HAGOOD AVENUE  
CHARLESTON, SOUTH CAROLINA 29403-5107

7 June 2019

Regulatory Division

U.S. Department of Transportation  
Federal Highways Administration  
Attn: Ms. Michelle L. Herrell  
1835 Assembly Street Suite 1270  
Columbia, South Carolina 29201

Re: Proposed I-526 West Lowcountry Corridor Improvements, Charleston County, South Carolina, Federal Project Number P027507, DA#: SAC-2019-00593

Dear Ms. Herrell:

This letter constitutes the U.S. Army Corps of Engineers, Charleston District's (Corps) response to the Federal Highways Administration (FHWA) electronically mailed request dated May 30, 2019, for concurrence with the purpose and need statement for the above referenced project. Additionally you requested concurrence on the draft Agency Coordination Plan, and the draft permitting timetable. The Memorandum of Understanding Implementing One Federal Decision under Executive Order 13807 (MOU) establishes concurrence points for the lead agency, in this case FHWA, to request written concurrence from the cooperating agencies whose authorizations are required for the project. The first concurrence point is the purpose and need statement (statement) to be used in the Environmental Impact Statement (EIS). Per the MOU, the cooperating agency will "either confirm its concurrence or inform the lead agency that it cannot yet concur."

We appreciate the opportunity to review these important project elements. The Corps concurs with the following documents:

1. Agency Coordination Plan (ACP)
2. Purpose and Need Statement
3. Permitting Timetable

We note that while the draft permitting time table addresses the NEPA process, it does not include timelines for other required consultations, such as Endangered Species Act, Essential Fish Habitat, and Section 106 of the National Historic Preservation Act. Each of the Federal cooperating agencies relies on these consultations to complete their respective records of decision. On this basis, we would like to discuss and confirm that the FHWA will lead these consultations concurrent with the NEPA process to facilitate our respective records of decision.

We remain committed to working with your staff in our role as a cooperating agency so that we may successfully fulfill our responsibilities under both NEPA and the Clean

Water Act. If you have any questions or concerns, please contact Mr. Christopher D. Mims. He can be reached at (843) 329-8154 or christopher.d.mims@usace.army.mil.

Respectfully,

 2019.06.07  
07:47:35 -04'00'  
Amanda L. Heath  
Chief, Special Projects Branch

Copy Furnished:

South Carolina Department of Transportation  
Attn: Mr. Chad Long  
Post Office Box 191  
Columbia, South Carolina 29202-0191





**DEPARTMENT OF THE ARMY**  
CHARLESTON DISTRICT, CORPS OF ENGINEERS  
69A HAGOOD AVENUE  
CHARLESTON, SC 29403

19 June 2020

Regulatory Division

U.S. Department of Transportation  
Federal Highway Administration  
Attn: Ms. Emily O. Lawton  
1835 Assembly Street Suite 1270  
Columbia, South Carolina 29201  
[jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov)

Re: Concurrence on the Lead Agency Preferred Alternative  
I-526 Lowcountry Corridor West Improvements Environmental Impact Statement (EIS)  
Charleston County, South Carolina  
Federal Project Number P027507; SAC 2019-00593

Dear Ms. Lawton:

This letter constitutes the U.S. Army Corps of Engineers, Charleston District's (Corps) response to the Federal Highway Administration (FHWA) electronically mailed request dated June 3, 2020, and received on June 4, 2020, requesting concurrence within 10 business days on the preferred alternative for the proposed I-526 Lowcountry Corridor West Improvements Environmental Impact Statement (EIS). The multi-agency Memorandum of Understanding Implementing One Federal Decision under Executive Order 13807 (MOU) establishes three concurrence points at which the lead agency, in this case FHWA, must request written concurrence from the cooperating agencies whose federal authorizations are required for the project. Per the MOU, the cooperating agency will "either confirm its concurrence or inform the lead agency that it cannot yet concur."

We appreciate the opportunity to review this important project element. **The Corps concurs with the preferred alternative to be carried forward for additional evaluation** as presented in your above referenced letter. Please note that while FHWA has identified a preferred alternative pursuant to the National Environmental Policy Act (NEPA), Corps regulations at 33 C.F.R. Part 325 Appendix B clarify that the Corps is neither an opponent nor proponent of the applicant's proposal; therefore the applicant's final proposal will be identified by the Corps as the 'applicant's preferred alternative' or 'applicant's proposed alternative.' Since the Corps evaluates each permit application to determine whether the applicant's proposed alternative represents the "Least Environmentally Damaging Practicable Alternative (LEDPA)," the Corps does not have a need to determine a preferred alternative as part of the Corps NEPA process. On this basis, the Corps concurs with the FHWA preferred alternative with the clarification that the LEDPA will form the basis for a Corps permit decision.

We remain committed to working with your staff in our role as a cooperating agency so we may successfully fulfill our responsibilities under both NEPA and the Clean Water Act. If you have any questions or concerns, please contact Dr. Richard L. Darden at (843) 329-8043 or [richard.l.darden@usace.army.mil](mailto:richard.l.darden@usace.army.mil).

Respectfully,



Digitally signed by  
HUGHES, TRAVIS, G. 1229867748  
Date: 2020.06.19 10:35:02 -04'00'

for: Rachel A. Honderd, PMP  
Lieutenant Colonel, U.S. Army  
Commander and District Engineer

Travis G. Hughes  
Chief, Regulatory Division

Copy Furnished:

South Carolina Department of Transportation  
Attn: Mr. Chad Long  
PO Box 191  
Columbia, SC 29202-0191  
[LongCC@scdot.org](mailto:LongCC@scdot.org)

South Carolina Department of Transportation  
Attn: Mr. Will McGoldrick  
PO Box 191  
Columbia, SC 29202-0191  
[McGoldriWR@scdot.org](mailto:McGoldriWR@scdot.org)



**DEPARTMENT OF THE ARMY**  
CHARLESTON DISTRICT, CORPS OF ENGINEERS  
69A HAGOOD AVE  
CHARLESTON, SOUTH CAROLINA, 29403

Regulatory Division

U.S. Department of Transportation  
Federal Highway Administration  
Attn: Ms. Emily O. Lawton  
1835 Assembly Street Suite 1270  
Columbia, South Carolina 29201  
jeffrey.belcher@dot.gov

Re: Concurrence on the Proposed Alternatives to be Carried Forward for Detailed Evaluation for the proposed I-526 Lowcountry Corridor West Improvements Environmental Impacts Statement (EIS), Charleston County, South Carolina, Federal Project Number P027507, DA#: SAC 2019-00593


Dear Ms. Lawton:

This letter constitutes the U.S. Army Corps of Engineers, Charleston District's (Corps) response to the Federal Highways Administration (FHWA) electronically mailed request dated March 12, 2020, wherein your office requested concurrence within 10 business days on the provided alternatives to be carried forward for detailed Evaluation for the proposed I-526 Lowcountry Corridor West Improvements Environmental Impacts Statement (EIS). On March 26, 2020, your office extended the response time, for this concurrence, an additional week, to April 1, 2020. The Memorandum of Understanding Implementing One Federal Decision under Executive Order 13807 (MOU) establishes concurrence points at which the lead agency, in this case FHWA, must request written concurrence from the cooperating agencies whose authorizations are required for the project. Per the MOU, the cooperating agency will "either confirm its concurrence or inform the lead agency that it cannot yet concur."

We appreciate the opportunity to review these important project elements. **The Corps concurs with the proposed alternatives to be carried forward for additional evaluation** as presented in your above referenced communication and presentation on February 12, 2020.

We remain committed to working with your staff in our role as a cooperating agency so that we may successfully fulfill our responsibilities under both NEPA and the Clean Water Act. If you have any questions or concerns, please contact Mr. Christopher D. Mims at (843) 329-8154 or [christopher.d.mims@usace.army.mil](mailto:christopher.d.mims@usace.army.mil).

Respectfully,

  
Digitally signed by  
HUGHES, TRAVIS G. 1229867748  
Date: 2020.03.27 15:14:28 -04'00'

for: Rachel A. Honderd, PMP  
Lieutenant Colonel, U.S. Army  
Commander and District Engineer

Travis G. Hughes

Chief, Regulatory Division

Copy Furnished:

South Carolina Department of Transportation  
Attn: Mr. Chad Long  
PO Box 191  
Columbia, SC 29202-0191  
LongCC@scdot.org

South Carolina Department of Transportation  
Attn: Mr. Will McGoldrick  
PO Box 191  
Columbia, SC 29202-0191  
McGoldriWR@scdot.org

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
United States Coast Guard  
Seventh District

909 SE 1<sup>st</sup> Ave. (Rm432)  
Miami, FL 33131  
Staff Symbol: (dpb)  
Phone: 305-415-6736  
Fax: 305-415-6763  
Email: [randall.d.overton@uscg.mil](mailto:randall.d.overton@uscg.mil)

16475/164  
June 8, 2020

Mr. J. Shane Belcher  
Federal Highway Administration  
1835 Assembly Street (Suite 1270)  
Columbia, SC 29201  
Via email: [jeffrey.belcher@dot.gov](mailto:jeffrey.belcher@dot.gov)

Dear Mr. Belcher,

This letter is in response to your letter dated June 3, 2020 requesting Coast Guard concurrence regarding the preferred alternatives to be carried forward in the I-526 West Lowcountry Corridor Improvements Environmental Impact Statement (EIS) in Charleston County, South Carolina; Federal Project Number P027507.

We have reviewed the proposed preferred alternative which was presented at the monthly agency meeting held on May 14, 2020. The Coast Guard concurs with the proposed alternative to be carried in the Draft EIS.

Thank you for the opportunity to participate as a co-sponsor of this project or infrastructure improvement project.

If you have any questions or concerns please contact me at 305-415-6736 or email [Randall.D.Overton@uscg.mil](mailto:Randall.D.Overton@uscg.mil)

Sincerely,

A handwritten signature in blue ink, appearing to read "Randall D. Overton".

RANDALL D. OVERTON  
Chief, Permits Division  
District 7 Bridge Program  
U.S. Coast Guard



APPENDIX D  
Agency Meeting Summaries

# Final ACE Meeting Notes – March 14, 2019

**Attendees:**

FHWA	Shane Belcher Michelle Herrell
NOAA	Cindy Cooksey (on phone)
USEPA	Kelly Laycock (on phone)
USFWS	Mark Caldwell (on phone)
SCDHEC	Chuck Hightower Cameron Polomski
SCDHEC-OCRM	Josh Hoke (on phone) Chris Stout (on phone) Blair Williams (on phone)
SCDNR	Susan Davis (on phone) Greg Mixon (on phone) Lorianne Riggan (on phone)
SCDOT	Sean Connolly Siobhan Gordon David Kelly Jessica Kennedy Lyle Lee Chad Long Vince McCarron Will McGoldrick Joy Riley
SCPRT	Amy Blinson
SHPO	Elizabeth Johnson Joe Wilkinson
Stantec	Rick Day (on phone)
Three Oaks Engineering	Russell Chandler Heather Robbins

**Purpose of the Meeting:**

Agency coordination kick-off meeting for One Federal Decision for I-526 Lowcountry Corridor WEST.

FHWA gave a summary overview of One Federal Decision (OFD) in E.O. 103807

- Executive Order 13807 – Establishing Discipline and Accountability in the Environmental Review and Permitting Process. Signed and became effective August 15, 2017.
  - This Executive Order (EO) requires major infrastructure projects to be processed as One Federal Decision; this project is considered a major infrastructure project and will follow One Federal Decision.



- Sets a goal of two years between issuance of Notice of Intent (NOI) to Record of Decision (ROD), and any additional permits/authorizations 90 days after ROD
  - This does not replace any current laws or regulations
- Key aspects of OFD per EO 13807:
  - Development of a single permitting timetable for the necessary environmental review and authorization decisions of agencies who have a NEPA or permit decision.
  - Preparation of a single EIS that can be used by other federal agencies to make their NEPA/permit decisions.
  - Issuance of all necessary permit and authorizations within 90 days after the ROD
  - Performance Accountability reporting to the Office of Management and Budget (OMB). FHWA is awaiting guidance from FHWA HQ whether hours worked need to be tracked on this project, and how to do that.
- Memorandum of Understanding for Implementing OFD – signed by USDOT and 11 federal agencies in April 9, 2018. Outlines how signatory agencies will jointly and cooperatively process environmental reviews and make authorization decisions.
  - MOU stresses the development of the permitting timetable in coordination with agencies to meet project milestones.
  - Preliminary project planning to be done prior to the issuance of the NOI.
  - There are scoping and concurrence points.
  - It includes an elevation and dispute resolution process to address issues and avoid delays. However, this is elevation to Headquarters of each agency. FHWA would prefer to have a dispute resolution process internally to this project to avoid elevation to headquarters offices.
  - Three main concurrence points for lead/cooperating agencies:
    - Purpose and Need (prior to issuance of NOI)
    - Alternatives to be carried forward for evaluation (prior to detailed analysis for Draft EIS)
    - Preferred Alternative (prior to FEIS)
  - FHWA will request written concurrence. Per the MOU, cooperating agency will have 10 business days to concur or not concur. If more time is needed, we can discuss this with the cooperating agencies
- One Federal Decision – activities that will occur before the NOI:
  - Identify Cooperating and Participating agencies and invite them to participate;
  - Develop a draft P & N;
  - Develop a draft Agency Coordination Plan and Permitting Timetable;
  - Identify community and stakeholders affected and develop a Public Involvement Plan (PIP);
  - Identify preliminary Range of Alternatives;
  - Determine the extent of analysis needed for each resource;
  - Initiate applicable resource surveys/studies;
  - Identify potentially significant environmental issues;





- Identify potential mitigation strategies; and,
- Initiate permit activities as soon as possible, such as pre-application process
- Working Agreement signed between USACE, USCG, USEPA, USFWS, NOAA, and FHWA:
  - Intended to accelerate and coordinate the planning, environmental review, permitting and decision-making for FHWA projects that fall under OFD
  - Included attached chart agreed upon by the agencies list above for the general coordination process for projects (See attached chart).
  - Provides for:
    - Agencies identifying a main point of contact for the project early in the process;
    - Participate in early coordination meetings;
    - Identify information required and/or applications needed for agency determinations as early as practicable;
    - Comment and/or concur on NEPA documents in a timely manner; and,
    - Dispute resolution.
    - FHWA HQ guidance is we should seek to get concurrence on the purpose and need, and range of alternatives/alternatives to be carried forward prior to the Notice of Intent.
    - FHWA HQ also strongly suggests concurrence by the agencies on the permitting timetable prior to issuing the NOI.
- Will be providing information to agencies earlier than when DEIS is issued. Goal is to provide sections of DEIS for review prior to the DEIS so that any comments/issues can be addressed sooner.
- First OFD project in the state, third in the nation done by FHWA. However, we are further along in the process than the other states, so have an opportunity to set an example for future projects and show other states/agencies how well we work together.
- If there is a delay for some reason, we will document it thoroughly, as we will be tracked on the federal permitting dashboard. Important to have local dispute resolution process to avoid delays. We will update the permitting timetable accordingly.
- USCG public notice on navigation will be issued before or during the DEIS comment period.
- USACE joint public notice will be issued when FHWA publishes DEIS so the comment period for the public notice and DEIS are at the same time.
- FHWA wants to work cooperatively to ensure that all agencies information needs for approvals and authorizations can be met within the timeframe in the OFD.

**Three Oaks Engineering and Joy Riley of SCDOT provided a Project Summary:**

The 526 Lowcountry Corridor WEST is between Paul Cantrell Boulevard and Virginia Avenue, approximately 11.4 miles long (refer to Figure 1). The project is a four-lane divided highway. SCDOT currently ranks the segments of I-526 between I-26 and Virginia Avenue as one of the most congested segments of interstate highway in the State. The remainder of the I-526 Lowcountry Corridor WEST project, from I-26 to Paul Cantrell Boulevard, ranks among the top ten of the State's existing most

congested corridors. Forecasts show that segments of that corridor will continue to be among the State’s most congested in 2040. The interchange of I-526 and I-26 is the major source of the congestion. This is due to the high number of vehicles moving between I-26 and I-526, coupled with closely spaced interchanges with ramps that have steep grades and tight curves, and limited distances for vehicles to merge onto and off of I-526.

The I-526 and I-26 System-to-System interchange is a key interchange locally. It links downtown Charleston, Summerville, West Ashley, and Mount Pleasant. I-26 links the Charleston area with the other major cities to the west like Columbia, Spartanburg, and Asheville, North Carolina, as well as with I-95, I-77, I-20, I-85, I-40, and I-81. I-526 provides the only freeway access to two important port terminals - the North Charleston terminal and the Wando Welch terminal. Wando Welch is the busiest terminal in the region and has no access to rail. Not only is I-526 an important route for daily commuting traffic, it is also part of a network for transporting freight and commercial goods to and from the Port of Charleston and throughout the region. To the west of I-26, the route crosses the Ashley River and provides a similar connection to the growing West Ashley area.

The purpose of this project is to increase capacity and improve operations at the I-26/I-526 interchange and along the I-526 mainline from Virginia Avenue to Paul Cantrell Boulevard.



Figure 1

**Three Oaks Engineering went through the studies that had been completed and their status:**

- Cultural resources survey has been completed and will be submitted to SHPO in March 2019.
- Wetland delineations were almost completed as well as critical area delineations.



- Natural resources studies were still ongoing.
- Traffic studies being updated to 2050 and preliminary alternatives are being updated to reflect the results of the 2050 traffic modeling.
- Hydrologic surveys have been completed and initial drainage designs are underway.

#### **Agency Input:**

##### **FHWA**

- FHWA asked the agencies to review the draft agency coordination plan and the overall NEPA schedule in the back on the plan and provide comments on what deliverables they would need in order for the major milestones to be met in that overall schedule.
- Concurrence points are only required for coordinating agencies based on OFD and Section 6002 since they have NEPA decision associated with permitting decisions. Thus, USACE and USCG would be cooperating agencies for the project as they both have permit decisions. However, FHWA would like participating agencies to also concur on major milestones to ensure agencies are on board with the project as it goes through the NEPA process.
- FHWA and SCDOT asked if SCDHEC and SCDHEC-OCRM would like to be a cooperating agency also since they had an approval. SCDHEC and SCDHEC-OCRM stated they would like to discuss that internally and also asked how the schedule would flow for permitting with the USACE. FHWA asked if it would be beneficial if there was a meeting between USACE, SCDHEC, SCDHEC-OCRM, FHWA, and SCDOT.
- FHWA would like to develop a dispute resolution process in case an issue should arise so that issues can be handled at the state level rather than rely on the dispute resolution process that is in the OFD guidance, which refers it to the headquarters office of each agency. The I-73 dispute resolution process worked well and would like to see something similar for this. **Action Item: Three Oaks Engineering to develop a draft process agreement/dispute resolution process based on I-73 agreement.**
- **Action Item: FHWA will send letter requesting agencies participation as cooperating or participating agencies by end of March. FHWA will send it to the lead office and copy those in the meeting who will be working directly on the project.**
- This project will have extensive environmental justice outreach because community impacts are one of the reasons this project was elevated to EIS. FHWA will coordinate with their internal expert in environmental justice and also reach out to USEPA's expert on environmental justice. FHWA offered to share draft public involvement plan with any other agency who wanted to review it.

##### **USFWS**

- Appears that congestion is not caused by 526 interchange, but farther west near Ashley Phosphate, and thought adding more capacity would add more cars. SCDOT explained that this project is intended to focus on the I-526 corridor as well as the congestion at the I-526/26 interchange. Other projects may be done in the future on I-26 based on regional congestion management plan study currently underway.



- Would like to see a permittee responsible mitigation plan (PRM) for salt water impacts instead of a bank for mitigation.
- Improving Filbin Creek could be part of mitigation plan
- No T&E specific concerns within corridor but just outside there are known manatee occurrences (on I-526 E corridor)
- Stated there was no federally-designated critical habitat in the project area

#### **NOAA-NMFS**

- NMFS would also not support use of Murrayhill and Clydesdale banks for this project
- Full EFH assessment will be needed, including assessment of Filbin Creek

#### **SCDHEC**

- SCDHEC has one year to make a decision on the Section 401 water quality certification and is concerned about the timeline if a full permit application is not available at the time of the joint public notice issued by USACE.
- Evaluate and discuss internally if SCDHEC wants to be a cooperating or participating agency
- SCDHEC would do the work needed on the Section 401 water quality certification and pass it to SCDHEC-OCRM who would take the lead on the 401 and the Coastal Zone Certification since they to issue the critical area permit.

#### **SCDHEC-OCRM**

- The permit application would require a certified critical area line. Three Oaks Engineering stated that is would have that done in July. Stated that SCDHEC-OCRM certifies the critical area line first, then the USACE will follow with their jurisdictional determination.
- SCDHEC-OCRM has up to 6 months to make a decision on the coastal zone certification (CZC).
- Critical Area Permit is good for five years
- Remind SCDOT and Three Oaks Engineering that Critical Area surveys need to be coordinated with OCRM.

#### **SCDNR**

- Suggested a tract of Cainhoy Plantation on Daniel Island as a possible PRM site, as it has freshwater, brackish water, T&E species and species of concern.
- Will a letter be sent out requesting comments? SCDOT stated they would send out letters at formal concurrence points and request concurrence in writing.
- Main concern is tidal river crossings.
- Encouraged SCDOT to reach out to SCDNR protected species group.

#### **SCDOT**

- Will provide all agencies the same documents regardless of status as cooperating or participating agency
- Would like state agency input.
- Consider this a formal request for comments on documents already sent, including the draft purpose and need statement and the draft agency coordination plan.
- Please send Will McGoldrick comments on these documents by 3/29.

#### **SCPRT**



- SCPRT provided a map of the Section 6(f) property for boundary lines
- Stated they need to see what is being taken as soon as possible to start process
- Anticipate a full 6(f) conversion on Russelldale.
- Stated that SCDOT and FHWA need to reach out to North Charleston since they manage the property.
- Stated that identifying replacement property in the same community is a concern.
- SCDOT stated they would set up a separate meeting with SCPRT and FHWA on Section 6(f) conversion process.

#### SHPO

- Hadn't received the cultural resources report yet but would review it and talk to SCDOT after the review
- Stated they would do a two-step process, first they would do concurrence on eligibility determinations and then do concurrence on effect determinations.

#### Three Oaks Engineering

- Proposed Cooperating and Participating Agencies.
- NEPA permitting schedule and Permitting timetable are two separate documents. ACE meetings as well as additional monthly meetings. Milestone meetings correlate with concurrence points. Discuss Agency Coordination Plan, permitting timetable and P&N in April. First concurrence points are in May 2019. Agencies letters to go out in March. 10 days for concurrence but can extend as needed. Refer to draft schedule.
- Propose monthly meeting: 3<sup>rd</sup> Thursday of each month at 9:00 am. Move April meeting to 4/23 due to Spring Break.
- **Action items: Agencies review plan and permitting timetable, P&N comments to Will 3/29. Incorporate comments from 4/23 meeting. Permitting meeting to be scheduled. Doodle poll. Draft dispute and process agreement.**

#### Action Items:

Action Items	Date	Status
SCDOT to set up meeting between USACE, SCDHEC, SCDHEC-OCRM, FHWA and SCDOT	March 14, 2019	Action completed. Meeting set for April 1, 2019
Three Oaks Engineering to develop a draft process agreement/dispute resolution process based on I-73 agreement.	March 14, 2019	
FHWA will send letter requesting agencies participation as cooperating or participating agencies by end of March 2019.	March 14, 2019	Letters were sent out via FedEx on March 29, 2019
Agencies to review the draft purpose and need statement and draft agency coordination plan and provide Will McGoldrick comments by 3/29/2019	March 14, 2019	
SCDOT to set up meeting with FHWA and SCPRT regarding Section 6(f) conversion process	March 14, 2019	



**Cooperating Agencies:**

Agency	Primary Responsibility
U.S. Coast Guard (USCG)	Navigational Permitting for Bridges
U.S. Army Corps of Engineers (USACE)	Jurisdictional Area Determination and Section 404/10 Permitting; Wetlands and streams expertise

**Participating Agencies:**

Federal Agencies	
Agency	Primary Responsibility
U.S. Fish and Wildlife Service (USFWS)	Consultation on Endangered Species Act Migratory Bird Treaty Act, Bald & Golden Eagle Protection Act, Fish & Wildlife Coordination Act Streams and wetlands expertise
U.S. Environmental Protection Agency (USEPA)	NEPA/Environmental Justice Review Section 404, Section 401, Water Quality
NOAA National Marine Fisheries Service (NMFS)	Essential Fish Habitat Endangered Species Act/Marine Mammal Protection Act Coordination

State Agencies	
Agency	Primary Responsibility
South Carolina Department of Archives and History (SCDAH)	Archaeological and Historical Resources consultation, Section 106 review
South Carolina Department of Health & Environmental Control; Ocean and Coastal Resource Management (SCDHEC-OCRM)	Jurisdiction of Critical Areas, Critical Area Permitting, Air, and Section 401 Water Quality & CZM consistency determinations; wetlands and streams expertise
South Carolina Department of Natural Resources (SCDNR)	State Protected Species; wetlands and streams expertise
South Carolina Department of Parks, Recreation & Tourism (SCPRT)	Consultation on Section 6(f) properties funded by Land and Water Conservation Fund Act

Sovereign Nations	
	Primary Responsibility
Catawba Indian Nation	Historic/cultural resources review
Eastern Shawnee Tribe	Historic/cultural resources review
Muscogee (Creek) Nation	Historic/cultural resources review



**Draft Schedule:**

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>March 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 2019
Agencies review draft Purpose and Need Statement	April 2019
Agencies review Agency Coordination Plan and Permitting Timetable	March-April 2019
<i>Follow-up Agency Meeting to discuss ACP, Permitting Timetable, and P&amp;N Statement</i>	<i>April 2019</i>
<b>Concurrence Point for Agency Coordination Plan and Permitting Timetable</b>	<b>May 2019</b>
<b>Concurrence Point for Purpose and Need Statement</b>	<b>May 2019</b>
Project Initiation Letter and Navigation Report sent to USCG	May 2019
<i>Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives</i>	<i>Summer 2019</i>
Agencies Review the Preliminary Range of Alternatives for Concurrence	Summer 2019
Submit Preliminary Jurisdictional Determination to USACE & Critical Area to SCDHEC-OCRM	July 2019
FHWA issues Notice of Intent (NOI)	July 2019
Community and Stakeholder Meetings	August-September 2019
Public Information Meeting	Fall 2019
<i>Agency Meeting to discuss initial Alternatives Analysis and Reasonable Range of Alternatives</i>	<i>Fall 2019</i>
<b>Concurrence Point for Preliminary Range of Alternatives/Alternatives Carried Forward by Agencies</b>	<b>Fall 2019</b>
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall/Winter 2019
<i>Agency Meeting to discuss potential mitigation options</i>	<i>Winter 2019</i>
2020	
<i>Agency Meeting to discuss Reasonable Alternatives and Preferred Alternative</i>	<i>Late Spring 2020</i>
Preliminary Draft EIS section for review by Agencies	Spring/Summer 2020
<b>Agency Meeting and Concurrence Point for Preferred Alternative by Agencies</b>	<b>Summer 2020</b>
Pre-Application Meeting with UASCE and SCDHEC	Summer 2020
Draft EIS issued; Joint USACE Individual Permit and USCG Public Notices	Fall 2020
Community and Stakeholder Meetings	Fall 2020
Public Hearing	Fall/Winter 2020
<i>Agency Meeting to discuss comments received during the public hearing comment periods and path forward to FEIS/ROD</i>	<i>Winter 2020-2021</i>
Response to Public and Agency Comments	Winter 2020-2021
2021	
Prepare Final EIS/Record of Decision	Spring 2021
FHWA Issues FEIS/ROD	Summer 2021
USACE and USCG Issue Permit Decisions	Summer/Fall 2021

# I-526 West Agency Coordination Meeting

## April 23, 2019

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**Attendees:**

FHWA	Michelle Herrell (on phone)
NOAA	
USACE	Christopher Mims (on phone)
USEPA	Alya Singh-White (on phone)
USFWS	Mark Caldwell (on phone)
SCDHEC	Chuck Hightower (on phone) Cameron Polomski (on phone)
SCDHEC-OCRM	Josh Hoke (on phone) Blair Williams (on phone)
SCDNR	
SCDOT	David Kelly Chad Long Will McGoldrick
SCPRT	
SHPO	
Stantec	
Three Oaks Engineering	Amanda Chandler Russell Chandler (on phone) Heather Robbins Geni Theriot (on phone)

**Purpose of the Meeting:**

Follow-up Agency Meeting to discuss Agency Coordination Plan (ACP) comments, Purpose and Need, Permitting Timetable, and Dispute Resolution Process.

Agencies that attended were asked if any changes need to be made and for any additional comments as meeting progressed.

**I. Comments Received from Agencies on ACP and P&N:**

Heather Robbins provided overview and response of comments received from agencies. Five (5) comments were received from the agencies and reviewed during the meeting.



Agency	Comment
US Fish and Wildlife Service	<b>Purpose &amp; Need</b> "There is no obvious stated Need for the project to support the stated Purpose. We recommend that the Need Statement be revised to entail a tangible benefit or resolution to a targeted problem."
US Fish and Wildlife Service	"The Service has no objections to the <b>Agency Coordination Plan</b> discussed during the March 14,2019 meeting. We do recommend adding projected or approximate dates for onsite field visits to the project area as well as potential mitigation properties. Such dates can be refined as the I-526 project develops."
US Fish and Wildlife Service	"The Service has no objection to the <b>Draft Permitting Schedule</b> . However, we are concerned that the accelerated timelines stimulated by the One Federal Decision process is an aggressive schedule. It may not provide ample time to thoroughly review alternatives in order to find the least environmentally damaging alternative and appropriate mitigation strategy to compensate for unavoidable impacts for the project. "
SC State Historic Preservation Office	"We offer no specific comments regarding this stage of project review under the One Federal Decision guidance. If abstaining from such concurrence points presents a problem with implementing the OFD process, please communicate with us so that we may discuss this further. I also request that you include me in Table 2.3 of the ACP as the primary contact at the SC SHPO for this project."
SC Department of Natural Resources	"The DNR offers no specific comments or concerns regarding the review of this project under the One Federal Decision process. We would ask that the DNR's role in dispute resolution be clarified in the Final ACP. We would also stress the need for an in-kind watershed scale based PRM to address the compensatory mitigation needs of the project."

Response to agency comments made during meeting:

1. Need statement will be in Chapter 1 and completed before the DEIS. Agencies will receive the Need statement in advance for comments.
2. Dates for field visits will be added to the Agency Coordination Plan. HDR will be able to provide dates after identifying potential properties. A mitigation needs assessment will be presented by HDR at the August 14<sup>th</sup> meeting.
3. The time to comment and make decisions on the Draft Permitting Timetable is now to keep on track with aggressive schedule. Working to give agencies as much advance notice as possible.
4. Participating agency can abstain, but FHWA would like concurrence with all agencies whether participating or cooperating.
5. Clarify roles in dispute resolution process. Table in dispute resolution will be updated with agency titles to keep consistent.

## **II. Purpose Statement:**

Heather Robbins described that the Purpose statement has not been changed and agency concurrence is requested. Need is still being developed as Chapter 1 of the DEIS and will be provided to agencies for review prior to issuance of DEIS.

## **III. Agency Coordination Plan:**

Heather Robbins described that the Agency contact information was updated and added into Table 2-3 of the ACP, Version 2.

Version 3 of the ACP will include an updated NEPA/Permitting Timetable, Table 3-1. The updated schedule will include the date of today's meeting and any subsequent milestones where more detailed information is known. The Permitting Timetable will be added as an appendix to the ACP.

FHWA sent Cooperating and Participating invitation Letters on March 29, 2019. Responses will be added to the ACP. Chad Long asked if we have received a response from each agency. Heather Robbins to follow-up.

FHWA will send a letter requesting concurrence from agencies on:

1. ACP
2. P&N
3. Permitting Timetable

## **IV. Permitting Timetable:**

Discussion led by Will McGoldrick from SCDOT. Representatives from FHWA, USACE, SCDHEC, SCDHEC-OCRM, and SCDOT met to go through the draft Permitting Timetable. Each agency was asked for an appropriate timeframe for submittals and review. Anticipate submitting JD and Critical Line plats in late June. Decision by October to move forward with range of alternatives.

Red squares on Permitting Timetable are very important date to meet to maintain schedule. Comments and concerns are needed ASAP to maintain schedule.

At the upcoming December Agency Coordination meeting, Project Team plans to present mitigation needs assessment. Field visits to potential sites are anticipated in Spring 2020.

Anticipate comment responses after hearing in January 2021. All permitting agencies will meet to go over what is expected. This is not a firm deadline but will need responses by May to meet water quality certification deadline.

Permitting Timetable shows that the ROD will be issued in July after 401 and CAP. SCDOT asked in SCDHEC or SCDHEC-OCRM would have any need for the ROD to be issued before. Both agencies commented that they would like to see the final ROD, but with agency coordination and addressing all comments a decision

from their agencies could be made. SCDOT agreed and would share draft information to allow for easy of decision making without the final ROD in hand.

**V. Agency Process Agreement and Dispute Resolution Process:**

Discussion led by Heather Robbins that the Agency Process Agreement and Dispute Resolution was developed after March ACE Meeting.

Dispute Resolution consists of two levels.

- 1) Fill out template attached in ACP to outline issue. Agencies will meet and come to concurrence that the decision to move forward can be lived with. Will have a document to add to record and use if dispute escalates to level 2.
- 2) Next in command will be contacted and brought in to assist in Dispute Resolution.

Agency Process Agreement and Dispute Resolution will be added as an Appendix to the ACP.

**Upcoming Meetings:**

May 8<sup>th</sup> conference call will check on responses for Cooperating and Participating Agency invitations and concurrences.

June 12<sup>th</sup> project update.

July 10<sup>th</sup> Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives.

August 14<sup>th</sup> conference call will focus on mitigation needs assessment.

**Action Items:**

	Date	Status
Update Tables in ACP and add Permitting Timetable and Dispute Resolution as Appendices in ACP		
Update titles in Dispute Resolution table		
Update Schedules with meeting dates		
Create Concurrence letter to send to agencies		
SCDOT to reach out to SHPO about abstaining		
FHWA to follow up with USCG on concurrence points		

**Draft Schedule:**

Milestones	Date
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>March 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 29, 2019
Agencies review draft Purpose and Need Statement	April 2019
Agencies review Agency Coordination Plan and Permitting Timetable	March-April 2019
<i>Follow-up Agency Meeting to discuss ACP, Permitting Timetable, and P&amp;N Statement</i>	<i>April 23, 2019</i>
<b>Concurrence Point for Agency Coordination Plan and Permitting Timetable</b>	<b>May 2019</b>
<b>Concurrence Point for Purpose and Need Statement</b>	<b>May 2019</b>
Project Initiation Letter and Navigation Report sent to USCG	May or June 2019
Submit Preliminary JD to USACE & Critical Area to SCDHEC-OCRM	June 2019
FHWA issues Notice of Intent (NOI)	July 2019
<i>Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives</i>	<i>July 2019</i>
<i>Agency Meeting to discuss mitigation needs assessment</i>	<i>August 14, 2019</i>
Agencies Review the Preliminary Range of Alternatives for Concurrence	August 2019
Community and Stakeholder Meetings	August-September 2019
Public Information Meeting	Fall 2019
JD and Critical Area Line plat approval	September 2019
<i>Agency Meeting to discuss initial Alternatives Analysis and Reasonable Range of Alternatives</i>	<i>October 2019</i>
<b>Concurrence Point for Preliminary Range of Alternatives/Alternatives Carried Forward by Agencies</b>	<b>November 2019</b>
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall/Winter 2019
<i>Agency Meeting to discuss potential mitigation options</i>	<i>December 2019</i>
Potential mitigation site visits	Spring 2020
USCG Navigation Determination	April 2020
<i>Agency Meeting to discuss Reasonable Alternatives and Preferred Alternative</i>	<i>May 2020</i>
Preliminary Draft EIS section for review by Agencies	Spring/Summer 2020
<b>Agency Meeting and Concurrence Point for Preferred Alternative by Agencies</b>	<b>June 2020</b>
Pre-Application Meeting with UASCE and SCDHEC	July 2020
Application submittal	August 2020
Draft EIS issued; Joint USACE Individual Permit and USCG Public Notices	October 2020
Community and Stakeholder Meetings	Fall 2020
Public Hearing	November 2020
Response to Public and Agency Comments	Winter 2020-2021
<i>Agency Meeting to discuss comments received during the public hearing comment periods and path forward to FEIS/ROD</i>	<i>January 2021</i>
Response to comments	March 2021
SCDHEC 401 Decision	May 2021
SCDHEC-OCRM CAP	June 2021
Prepare Final EIS/Record of Decision	Summer 2021
FHWA Issues FEIS/ROD	July 2021
USACE Issue Permit Decision	August 2021
USCG Issues Permit Decision	November 2021



# DRAFT Agency Coordination Meeting Notes

## – July 10, 2019

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### Attendees:

FHWA	Shane Belcher Michelle Herrell Jim Martin
NOAA-NMFS	Cindy Cooksey Dale Youngkin
NPS	Alexis John
USACE	Christopher Mims
USCG	
USEPA	Alya Singh-White Amenetta Somerville
USFWS	Mark Caldwell
SCDHEC	Logan Smith
SCDHEC-OCRM	Chris Stout
SCDNR	
SCDOT	David Kelly Will McGoldrick
SCPRT	Justin Hancock
SCDAH	Joe Wilkinson
Three Oaks Engineering	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot

### Purpose of the Meeting:

Discuss Permitting Timetable and Agency Milestones with Agencies.

### Updates:

Permitting Timetable has not been updated to correspond with Agency Milestones. Need concurrence from agencies to merge tables together with correct milestones and dates. Once the Agency Milestones and Permitting Timetable are merged it will be added and maintained in the Agency Coordination Plan.

Dates shown in red on the Permitting Timetable represent the date FHWA sends out concurrence request. Need agency responses 30 days after request is sent from FHWA.

Draft Agency Milestones are attached with revisions made based on agency comments during the meeting.



**Additional Agency Comments:**

Provide dates and gray the box of completed milestones.

NOAA-NMFS: (Section 7) month day and year for milestones to be provided by ESA biologist, Andrew Herndon.

USFWS: At-Risk species need to be included in surveys.

MMPA: rulemaking vs. IHA. Pile driving would have an impact. Milestones for rulemaking (if applicable) to be requested from NMFS.

Milestones will be sent by FHWA for concurrence after final revisions.

Permitting Timetable will be revised and sent back out by FHWA for concurrence.

# Meeting Notes – July 25, 2019

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**Attendees:**

FHWA	Shane Belcher
NOAA	Andrew Herndon Jaclyn Daly
SCDOT	David Kelly Will McGoldrick Chad Long
Three Oaks Engineering	Heather Robbins

**Meeting:**

- Shane Belcher – provided background of permitting timetable
- Reviewed milestones specifically focused on Section 7 ESA and MMPA

**NFMS Section 7:**

- Ashley River is not critical habitat but possible foraging habitat for sturgeon
- DEIS anticipated October 2020
- Conclusion of Section 7 is scheduled for September 2020
- Initial Submittal of a Draft is scheduled for April 2020
- Andrew Herndon discussed that there would be a 135 day period if formal consultation is required
- SCDOT/FHWA believe it would (informal consultation)
- Andrew Herndon mentioned that if it is determined to be informal consultation then it may be eligible for streamlining efforts and can probably meet those deadlines
- FHWA- wants to build in the formal timeline with the 135 days to the conclusion.

**NMFS-MMPA:**

- FHWA explained the approach of including protective measures in construction efforts, so that an incidental take would not be applicable
- NMFS is unsure about the project therefore unable to make a determination. Ashley River does have resident dolphins.
- FHWA explained project would be adding drilled shafts in Ashley River to add 2 lanes in each direction.
- NMFS
  - Explained potential impacts from noise level exposure that are deemed as harassment.
  - Independent Marine Observers are recommended
  - Any applicant can move forward without getting NMFS authorization
  - Can do multiple 1 year IHA. This work would qualify as an IHA. Can also make effective date of IHA to be later to cover construction.



- SCDOT explained that the project is Design-Build so we do not know specific number and location of piles. So may need to wait until we know that information.
- SCDOT asked if One Federal Decision require NMFS- MMPA Concurrence
- NMFS explained that SCDOT/FHWA needs to determine if concurrence is needed, suggested that it is better to include and take off later, and stated that she is not sure if it will require an IHA at this time
- SCDOT stated that they will talk with FHWA to determine if they want to seek concurrence from NMFS on the MMPA. Suggested to change first item to “Determination if an IHA is needed” in Agency Milestone Table
- NMFS is not sure if that will work, need to get feedback from management.
- NMFS asked how to provide comments on DEIS?
- SCDOT indicated that the section will be sent out for NMFS review in Summer 2020.

**Action Item:**

- ✓ Next Steps: Updating Agency Milestone Table
- ✓ Permitting Timetable will be revised and sent back out by FHWA for concurrence.



# Agency Coordination Meeting Notes – August 14, 2019

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**Attendees:**

FHWA	Shane Belcher Jim Martin
NOAA-NMFS	Noah Silverman
NPS	Alexis John Chris Abbett
USACE	Christopher Mims
USCG	Randall Overton
USEPA	Kelly Laycock
USFWS	
SCDHEC	
SCDHEC-OCRM	Blair Williams
SCDNR	Lorianne Riggins
SCDOT	David Kelly Will McGoldrick
SCPRT	
SCDAH	Joe Wilkinson
Three Oaks Engineering	Amanda Chandler Heather Robbins Geni Theriot

**Purpose of the Meeting:**

Discuss Alternatives Evaluation Process/Criteria and Preliminary Range of Alternatives.

**Updates:**

USFWS contacted FHWA to give verbal concurrence with Agency Milestones and Permitting Timetable, unable to attend meeting.

Agency Milestones and Permitting Timetable will be continuously updated with items greyed out upon completion. Agency Milestones are now included on the Permitting Timetable.

NOI date moved from August to November to allow more time to front load the schedule before the OFD time clock starts and help maintain 2020 dates. Allows more time for pre-NOI activities and more development and detail of preliminary and reasonable alternatives.

Agency Concurrence – Agency Milestones and Permitting Timetable. FHWA previously sent letters to agencies for concurrence. FHWA asked today if verbal concurrence was possible with each agency. Not



all agencies can provide verbal concurrence so an email with a letter attached will be sent by FHWA to all agencies.

Alternatives Development Flowchart was presented to depict the alternatives evaluation process. Have Preliminary Range of Alternatives. Currently working through the first level of evaluation (second box down) which includes Purpose & Need, Traffic, and Traffic Reduction Potential. Once alternatives have been evaluated based on these criteria, the preliminary alternatives will be either, eliminated or carried forward to the Reasonable Alternatives. After Reasonable Alternatives are determined a Detailed Impact Evaluation will be conducted to select the Preferred Alternative. An Alternatives Matrix will be created with the Detailed Impact Evaluation criteria to quantify impacts for each Reasonable Alternative. After the evaluation process a Preferred Alternative can be selected.

**Additional Agency Comments:**

NOAA-NMFS – Certain milestones need to be added to Permitting Timetable whether need a permit or not, will send list to FHWA and SCDOT. Regarding MMPA, incidental take will be avoided but if need IPA, instead of IHA, will disrupt current timetable and NEPA document. The potential use of protective measures during construction was explained by FHWA in the July 25, 2019 meeting with NOAA-NMFS. Coordination will be continued.

NPS – Need Permitting Timetable and Agency Milestones

USACE & SCDNR – Need all Meeting Notes to date

USACE & SCDHEC-OCRM – Add “No Federal Action” Alternative to Preliminary Range of Alternatives.

15-day review time can be requested of agencies instead of standard 30 days.

**Action Items:**

July meeting notes have been provided to SCDOT to send to USACE

Criteria has been added to the Alternatives Development Flowchart

**Upcoming Events:**

- Agency Meeting – September 11, 2019 – HDR will present mitigation needs assessment. In the assessment all potential build alternatives with 8-lanes were used to show largest footprint. Avoidance and minimization are not included.
- Agency Meeting – October 9, 2019 – Discuss Preliminary Range of Alternatives.
- Public Information Meeting – November 21, 2019

**Revised DRAFT Alternatives Development Flowchart attached.**

# Agency Coordination Meeting Notes – September 11, 2019

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**Attendees:**

FHWA	Shane Belcher Jim Martin
NOAA-NMFS	Andrew Herndon Noah Silverman
NPS	Anita Barnett Alexis John
USACE	Christopher Mims
USCG	
USEPA	Alya Singh-White
USFWS	Mark Caldwell
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM	Chris Stout
SCDNR	Lorianne Riggan
SCDOT	Chris Beckham Shawn Connolly Chad Long Will McGoldrick
SCPRT	Justin Hancock
HDR	Ben Furr Blair Wade
Stantec	Rick Day
Three Oaks Engineering	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot

**Purpose of the Meeting:**

Discuss Mitigation Needs Assessment developed by HDR.

**Mitigation Needs Assessment Overview:**

HDR conducted a high-level assessment of the mitigation needs for the I-526 West project using a “big footprint” of the potential area. Revisions will be made as the alternatives design process continues. The estimated impacts represent a worst-case scenario. At this time wetland and stream limits are still under review and impact totals will be revised after JD completed. Existing mitigation banks that service the project area were analyzed for credit availability. No agency comments.

### **Mitigation Strategy Overview:**

The project is still in the early stages of developing a mitigation strategy. The goal of this meeting is to receive input from agencies. SCDOT is considering all options available for mitigation. The use of only mitigation banks does not seem feasible based on the existing credit and bank availability. SCDOT is aware of the opposition to the use of Clydesdale as mitigation for this project. SCDOT is investigating the combination of PRM and bank credits.

A landscape scale mitigation approach may be appropriate and beneficial for such a large project. The use of landscape scale mitigation would require SCDOT to consider a ratio of preservation/conservation acres to impacted acres. Ratios between impact types do not have to be the same, but a site should provide adequate mitigation to offset impacts.

SCDOT has a limited budget available. Money spent on restoration activities will limit the ability to purchase a high value conservation property under the landscape scale mitigation approach. Under the landscape scale approach, it may be difficult to mitigate all impacts “in-kind” due to limitations of the property. For example, a site may have freshwater wetlands and streams, but no tidal salt marsh. A combination of landscape scale mitigation and bank credits or additional PRM is allowable and should be considered under that scenario.

Potential sites suggested for PRM and/or landscape scale mitigation are the “Cainhoy” and “Cedar Hill” properties. These properties appear to provide appropriate levels of mitigation for freshwater wetland and stream needs but no tidal salt marsh on site. Use of these sites would require tidal impacts to be mitigated using another site or PRM.

PRM for tidal marsh impacts could include activities such as installation of living shorelines, oyster bed restoration, or aquatic nuisance species management. Another potential component is replacing or “upsizing” culverts in tidal areas to improve tidal flows and improving the surrounding marsh. Agencies would like to see a more defined plan of work for tidal impacts. SCDOT should not propose a plan to simply bankroll a fund for “future mitigation projects.”

Landscape scale or PRM properties with a King’s Grant designation can be helpful but are not required unless SCDOT is proposing tidal salt marsh preservation as part of the proposed mitigation plan. SCDOT should not request the preservation of tidal marsh on any property without King’s Grant since the tidal marsh is already protected by state and federal law.

The majority of tidal impacts quantified in the Mitigation Needs Assessment are shading impacts. If a minimal loss of function can be demonstrated could SCDOT reduce the required mitigation ratios for those shading impacts? OCRM requires a 1:1 ratio for public projects and must be provide enough offset for impacts.

HDR will prepare a short list of mitigation properties and tidal components for the December agency meeting.

**Additional Agency Comments on Mitigation Strategy Overview:**

USFWS suggested review of an apparent spoil island along the James Island Connector. The Cainhoy property was also suggested by USFWS.

SCDNR suggested there may be portions of Cainhoy that would provide tidal opportunities but may be unobtainable financially.

USACE suggests looking into Drum Island if thinking of using a spoil area for mitigation, could FOIA them to see an example of a proposal.

**Action Items:**

NOAA will contact Cynthia Cooksey about EFH.

EPA will Have Kelly Laycock review Mitigation Needs Assessment and comment.

**Additional Topics:**

FHWA reminded agencies that the concurrence deadline for the permitting timetable is due on September 18 if they had not responded to date. Future concurrence time frames will be set at 10 business days per the OFD MOU, concurrence will be assumed if no response.

**Upcoming Events:**

- Agency Meeting – October 9, 2019 – Discuss Preliminary Range of Alternatives
- Agency Meeting – November 13, 2019 – TBD
- Public Information Meeting – November 21, 2019

**Mitigation Needs Assessment attached.**

# Memo

Date: Wednesday, August 28, 2019

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Project: I-526 West Lowcountry Corridor

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To: Chris Beckham, SCDOT

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From: Ben Furr, HDR

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Subject: Mitigation Needs Assessment

## Purpose

This memorandum summarizes the estimated impacts to waters of the U.S. associated with the I-526 West Lowcountry Corridor project (Project). The memorandum also provides information regarding the availability of compensatory mitigation credits servicing the project area.

## Project Background and Regulatory Framework

The Project includes I-526 and the intersecting roadways of Rivers Avenue, I-26, International Boulevard, Montague Avenue, Dorchester Road, Leeds Avenue, and Glenn McConnell Parkway/Paul Cantrell Boulevard in Charleston County, South Carolina. The project is anticipated to result in impacts to Waters of the U.S. (WOUS) under the jurisdiction of the (USACE) as regulated by Section 10 and 404 of the Clean Water Act (CWA). Tidal marsh is also regulated as “Critical Area” by the South Carolina Department of Health and Environmental Control (SCDHEC) Office of Ocean and Coastal Resource Management (OCRM). Although two Project alternatives are currently under consideration, only one set of impact estimates is provided in this memorandum because the impact footprint is nearly identical for both alternatives. The major differences between the alternatives involve traffic distribution and 2-level versus 3-level interchange designs.

## Estimated Wetlands and Waters Impacts

Table 1 provides estimates of stream and wetland impacts for the Project. HDR used preliminary designs to estimate wetland and stream impacts. Estimates are expected to decrease as designs are developed and finalized. The 25' drainage offset line was used to set the permanent impact boundary. In areas where a drainage line was not present, slope stake lines set the impact boundary. In areas lacking drainage and slope stake lines, proposed right of way or existing right of way was used to set the impact boundary. Temporary clearing impacts were assigned to wetlands and streams located between the permanent impact boundary line and the proposed right of way line to account for impacts related to installing erosion control measures. Shading impacts were assigned to tidal wetlands underneath proposed bridges. Clearing impacts were assigned to streams and wetlands located within the I-526/I-26 intersection because the majority of these resources could be temporarily impacted

during construction of the flyovers. Clearing impacts were also assigned to streams underneath proposed bridges.

**Table 1. Required Mitigation Summary Table**

	I-526 West
Freshwater Wetland Impacts (AC)	49.53
Tidal Impacts (AC)	19.85
Stream Impacts (LF)	9,353

## Mitigation Bank Availability

Information provided in this memorandum is comprised of information obtained from publically-available sources, including the USACE Regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS), as of August 2, 2019. The project area was reviewed for mitigation banks currently servicing the project watershed. Table 4 summarizes the mitigation banks identified as having credits available to service the Project. Anticipated WOUS and Critical Area impacts associated with the Project are predominately located in Hydrologic Unit Code (HUC) 03050201 Cooper River watershed and Sea Islands/Coastal Marsh Level IV ecoregion. A small portion of the project south of Ashley River Road (SC 61) is located in HUC 03050202.

**Table 2. Mitigation Bank Availability Summary**

Mitigation Bank	Service Area	Available Credits			Notes/Status
		Freshwater Wetlands	Freshwater Streams	Critical Area Wetlands	
Caton Creek Mitigation Bank	Primary	59	12,000	N/A	Approved
Clydesdale Club	Tertiary	N/A	N/A	330	Approved; Past litigation & agency concern
Palmetto Umbrella Mitigation Bank: Big Run Site	Primary	715	32,965	N/A	Approved

# Agency Coordination Meeting Notes – October 9, 2019

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**Attendees:**

FHWA	Shane Belcher
NOAA-NMFS	Cynthia Cooksey Noah Silverman
NPS	Alexis John
USACE	Christopher Mims
USCG	
USEPA	
USFWS	Mark Caldwell
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM	Blair Williams
SCDNR	
SCDOT	Sean Connolly David Kelly Chad Long Will McGoldrick
SCPRT	
Stantec	
Three Oaks Engineering	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot

**Purpose of the Meeting:**

Discuss Alternatives Carried Forward

**Concurrence Tracking:**

DHEC/OCRM gave verbal concurrence for P&N and Permitting Timetable and are working on a joint letter.

NPS will send an official concurrence language email.

FHWA will send 3<sup>rd</sup> concurrence letter for the Alternatives Carried Forward.

Concurrence moving forward will be a 10-business day review per the OFD MOU.





### **Alternative Development:**

2013 Corridor Study evaluated various options to address congestion and capacity along I-526 and I-26. The Corridor Study led to the Preliminary Range of Alternatives. Refer to Alternatives Development Flowchart (“Funnel”) attached for the Preliminary Range of Alternatives.

Traffic tables reviewed. V/C (Vehicle Volume / Carrying Capacity) ratio explained generally to represent 1 is at capacity. Example: 0.50 = 50% capacity, 1 = 100% capacity. Anything over 1 is exceeding capacity. No-Build table shows one segment out of ten would be acceptable. The Build table is for a 2050 design year. The Build table compares 6-lane and 8-lane widening. The 8-lane widening was identified as a means to manage capacity and congestion.

Modal strategies were also evaluated. TSM/TDM and modal strategies result in a 12.6% reduction in congestion. The percentage represents the amount of traffic removed from I-526. These strategies are not feasible alone but may be incorporated into the Reasonable Alternatives.

### **Alternatives Carried Forward:**

Based on the traffic tables, it is recommended that the mainline of I-526 be widened to 8 lanes. Two options have been presented at each of the interchanges: I-26 (system to system), Rivers Ave., and Virginia/N Rhett.

Graphics shown are less than 30% design and variations at each interchange may be evaluated. SCDOT/FHWA requests agency feedback and concurrence on these alternatives before the proposed NOI and the Public Information Meeting on November 21<sup>st</sup>.

### **Agency Comments:**

USFWS asked about Filbin Creek restoration projects – SCDOT is coordinating with SCDNR and will address at the December mitigation meeting.

NOAA-NMFS concerned about EFH impacts at N Rhett interchange. One alternative presented at the N Rhett intersection and would like to see more alternatives that minimize impacts. – Will request more detail from engineers that would include refinements that would further avoid and minimize impacts.

USACE needs better explanation of designs to be able to concur and address avoidance and minimization of impacts. – Wording of concurrence letter will determine how agencies respond. – Concurrence is being asked on the locations not the specific configuration.

SCDNR requests further analysis of the designs for avoidance and minimization of impacts such as reduce shoulder width and slopes. Consider and evaluate construction methods to avoid and minimize impacts. Construction practices such as top down, minimal access widths/points, and others. These requests are with the understanding that methods may not be dictated or determined at this stage but at least considered.



**Action Items:**

Contact Howard Schnabolk at the NOAA Restoration Center about current and potential mitigation at Filbin Creek.

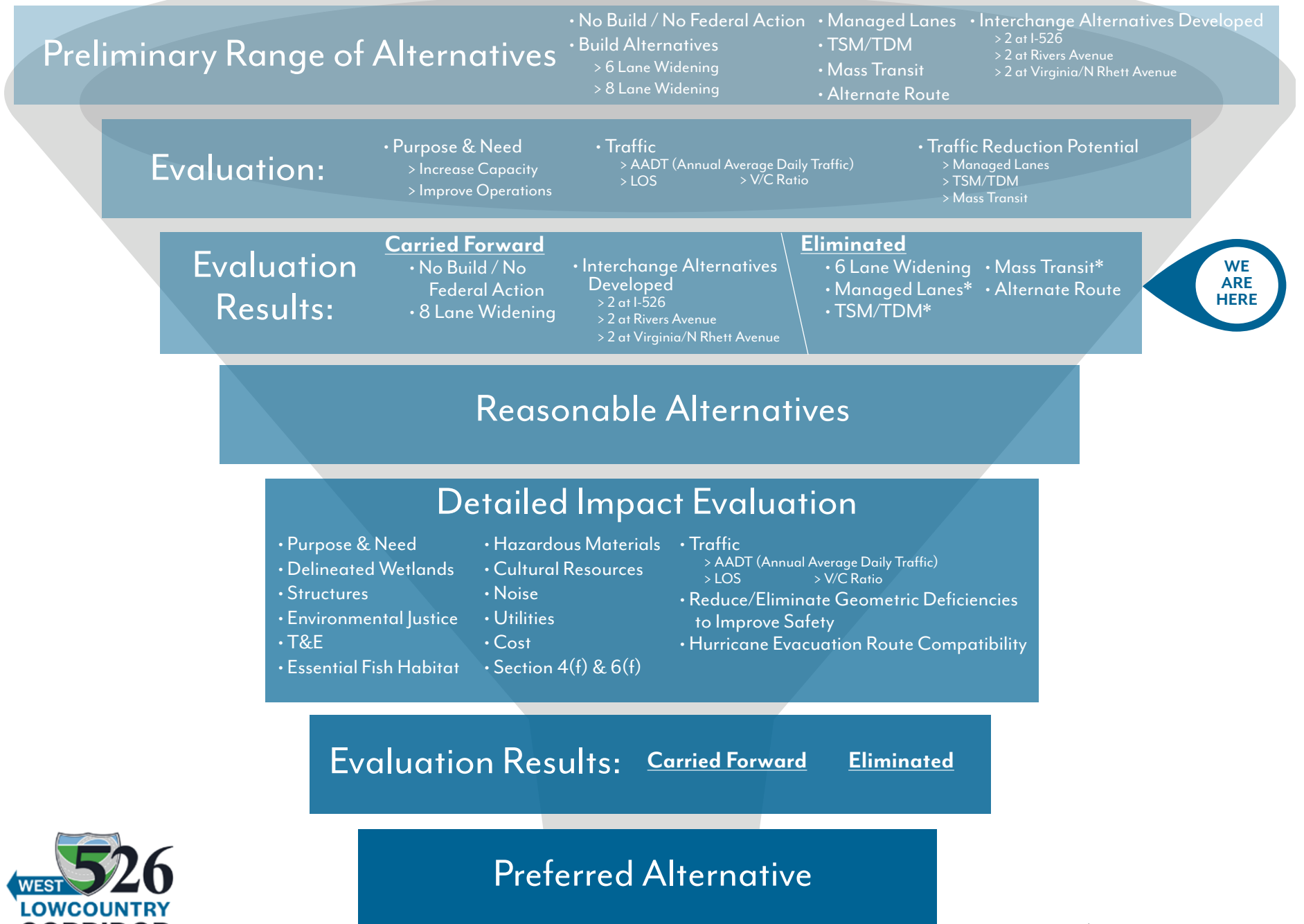
Request more detail on the Alternatives Carried Forward from engineers.

**Upcoming Events:**

- Agency Meeting – November 13, 2019 – TBD
- Public Information Meeting – November 21, 2019
- Agency Meeting – December 11, 2019 – Mitigation

**Alternatives Development Flowchart and Traffic Tables attached.**

# Alternatives Development Flowchart



Segment	Description	Segment	Description
1	SC 7 (Sam Rittenberg Blvd) to Paul Cantrell Blvd	6	International Blvd to I-26
2	Paul Cantrell Blvd to Leeds Ave	7	I-26 to Rivers Ave
3	Leeds Ave to Dorchester Rd	8	Rivers Ave to N Rhett Ave
4	Dorchester Rd to Montague Ave	9	N Rhett Ave to Virginia Ave
5	Montague Ave to International Blvd	10	Virginia Ave to Clements Ferry Rd

I-526 West No-Build Volumes by Segment

Segment	2015 AADT	No Build 2050 AADT	V/C	LOS
1	39,400	59,800	0.67	C
2	79,200	106,900	1.2	F
3	78,800	106,400	1.19	F
4	80,700	108,900	1.22	F
5	67,400	91,000	1.02	F
6	89,000	120,200	1.34	F
7	77,200	104,200	1.17	F
8	75,600	104,400	1.17	F
9	80,500	122,200	1.37	F
10	68,900	110,100	1.23	F

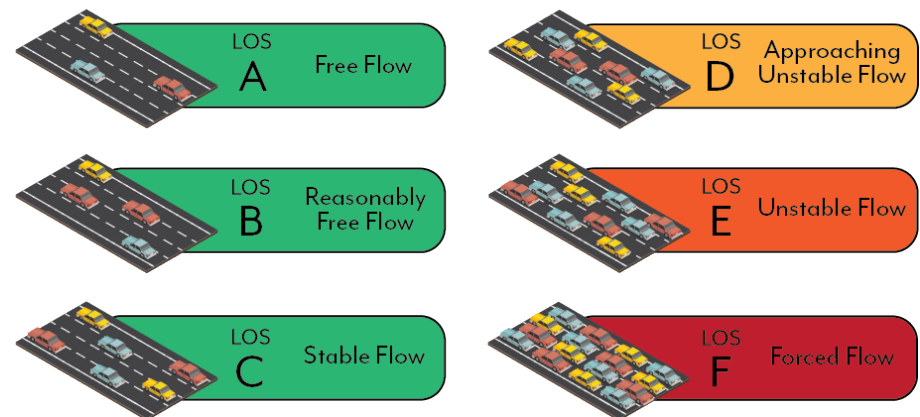
I-526 West Build Volumes by Segment

Segment	2015 AADT	Build 2050 AADT	V/C		LOS	
			6-Lane	8-Lane	6-Lane	8-Lane
1	39,400	68,500	0.52	0.39	B	B
2	79,200	136,900	1.03	0.78	F	D
3	78,800	134,000	1.01	0.76	F	D
4	80,700	127,300	0.96	0.72	E	C
5	67,400	109,600	0.83	0.62	D	C
6	89,000	126,700	0.95	0.72	E	C
7	77,200	116,100	0.87	0.66	D	C
8	75,600	126,700	0.95	0.72	E	C
9	80,500	148,400	1.12	0.84	F	D
10	68,900	133,800	1.01	0.76	F	D

I-526 West Capacity

LOS	4-Lane	6-Lane	8-Lane
A-B	53,500	75,300	97,000
C	69,800	100,500	130,100
D	83,600	120,300	156,500
E	89,400	132,700	176,000
F	> 89,400	>132,700	>176,000

## Level of Service (LOS)



### Definitions:

AADT – Annual Average Daily Traffic

Volume to Capacity Ratio (V/C) is a measure which compares roadway demand (vehicle volumes) with roadway supply (carrying capacity).

A V/C ratio greater than 1.0 is defined as a LOS E or LOS F.

Source: Highway Capacity Manual

Travel Demand Management Strategies

Strategy	Traffic Reduction Potential
Carpools/Rideshare Matching Vanpools	2.0%
Transit Pass Incentives Financial Incentives	1.5%
Telecommuting Compressed Work Week	0.1%
Work Flex Time Staggered Work Hours	0.5%
Bike/Walk Enhancements	0.1%
Education, Promotion	1.0%
<b>Total Reduction Potential:</b>	<b>5.2%</b>

Source: Adapted from "I-526 Corridor Analysis Between North Charleston and West Ashley", Table ES3

Note: All strategies with the exception of Bike/Walk Enhancements have been funded by FHWA.

Modal Strategies

Strategy	Traffic Reduction Potential
Improve Existing Transit Routes	0.30%
New Transit Routes	1.10%
Improved Connectivity to/from Transit	0.30%
Improve Transit Facilities and Equipment	0.30%
Public/Private Partnerships	0.60%
<i>BRT, Commuter Rail, Light Rail</i>	3.40%
<i>Zoning/Transit Oriented Developments</i>	0.00%
Increase Intermodal Split to Rail	3.50%
Expand Port Operating Hours	0.00%
Construct Near-Terminal Staging Areas	0.20%
Peak-Hour incentives/Disincentives	0.20%
Truck Routes away from I-526	0.90%
<b>Total Modal Reduction Potential:</b>	<b>7.40%</b>

Source: Adapted from "I-526 Corridor Analysis Between North Charleston and West Ashley", Table ES4

Note: The BRT, Commuter Rail, Light Rail strategy has been funded by Charleston County.

# SCPRT SECTION 6 (F) CONFERENCE CALL

## OCTOBER 21, 2019

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### Attendees:

FHWA	Shane Belcher
SCDOT	Chris Cooper
	David Kelly
	Chad Long
SCPRT	Justin Hancock
	Debbie Jordan
Stantec	Amy Sackeroff
Three Oaks Engineering	Russell Chandler
	Heather Robbins
	Geni Theriot

### Initial Application Received Feb 2020

- Letter from project sponsor
- What property is being converted and why
- The replacement property has to be identified
- 6f Screening will include all practicable alts considered
- Env screenings/appraisals

### NPS (cooperating agency)

- Will not get anything until everything is in place (Sept 2020)
- They don't review pieces- review entire package
- Goals is to get PRT letter by end of 2019/first of 2020
- No real format to follow. The process is more like a "series" of boxes to check things through the process
- Would like to keep NPS in the loop to ensure all information needed is accounted for
- Should we not coordinate along the way?
  - SCPRT says you can but he will also coordinate

### Stantec

- Existing facility appraisal is occurring
- Working with N. Charleston to determine what is available for replacement
- Also looking at private land too
  - Is there enough upland available on these private lands?
- Can appraisal be sent for SCPRT review? SCPRT agrees to provide early feedback?

- Public review for Section 6(f) coordinates with EIS Public Notices

#### FHWA

- Need community “buy in” on replacement locations
- SCPRT – record any feedback you receive to document community support → env
- Hold initial request letter until appraisals are received

#### General

- Subsequent to the conference call it was determined that an initiation letter would be sent to SCPRT in November 2019 to formally initiate Section 6(f) Coordination

# Agency Coordination Meeting Notes – November 13, 2019

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**Attendees:**

FHWA	Shane Belcher Jim Martin
NOAA-NMFS	Cynthia Cooksey
NPS	
USACE	Christopher Mims
USCG	Randall Overton
USEPA	Alya Singh-White
USFWS	Mark Caldwell
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM	Chris Stout Blair Williams
SCDNR	Stacie Crowe
SCDOT	Chad Long Will McGoldrick Joy Riley
SCPRT	Justin Hancock
Three Oaks Engineering	Amanda Chandler Heather Robbins Geni Theriot

**Purpose of the Meeting:**

Discuss Concurrence Points and upcoming milestones

**Concurrence Tracking:**

NOI published on November 8, 2019

DHEC/OCRM currently working on joint letter, Blair Williams to follow up on status and update SCDOT.

Concurrence Point for Alternatives Carried Forward moved to February 2020. Agency meeting on February 12, 2020 is a workshop to discuss Interchange Design Alternatives. Meeting will be held at the I-526 Community office in Charleston. Workshop is for agencies to participate and interact with engineers to address questions and concerns. Alternatives analysis and public comment summary will be provided.

Concurrence Points are not tracked on the FHWA dashboard. The NOI published date of November 8, 2019 will be added to the dashboard by FHWA HQ.





### **Public Involvement and Virtual Public Information Meeting (VPIM)**

Five Community Meetings have been set up prior to the Public Information Meeting on November 21, 2019. Three of the Community Meetings are being held in EJ communities. A Community Advisory Council (CAC) has been established and has held two meetings. An I-526 Community office has been set up and will be staffed to allow community members to drop in and discuss the project. The hours of the office are 10 a.m. to 6 p.m. Monday, Wednesday and Friday; 10 a.m. to 8 a.m. on Tuesday and Thursday; and 10 a.m. to 2 p.m. on the second and fourth Saturday of each month.

Project website with VPIM video is available to view at <https://www.526lowcountrycorridor.com/virtual-public-meeting-112119/>  
Public comment period ends January 4, 2020.

### **Action Items:**

- SCDOT, NPS and SCPRT to discuss Section 6(f) EA public comment period
- SCDOT/FHWA to share monthly EJ outreach report with EPA

### **Upcoming Events:**

- Public Information Meeting – November 21, 2019
- Agency Meeting – December 11, 2019 – Mitigation
- Agency Meeting – January 8, 2020 – Review of Public Comments Received
- Agency Meeting – February 12, 2020 – Agency Workshop

**Permitting Timetable attached.**

# Permitting Timetable

Revised 11/7/2019



2019	January	February	March	April	May	June	July	August	September	October	November	December
Action					<b>CP ACP + Purpose and Need</b> USCG Navigation Data Report to USCG	USCG Preliminary Navigation Determination Issued  Consultation initiated with SHPO/THPO  Section 106 Consultation initiated (6/18)	Submit JD and CALP packages  NOAA Initially Contacted Regarding MMPA Consultation	Agency Meeting to Discuss Alternatives Evaluation Process/Criteria & Preliminary Range of Alternatives (8/14)  <b>CP Agency Milestones and Permitting Timetable</b>	Agency Meeting to Discuss Mitigation Needs Assessment (9/11)	Agency Meeting to Discuss Alternatives Analysis and Reasonable Alternatives (10/9)  <b>JD + Critical Area Line Plat Approvals</b>	NOI issued (11/8)  Determination of Applicability of Section 4(f)  Agency Meeting (11/13)  Section 106 Consulting parties invited  Public Information Meeting (11/21)	Agency Meeting to Discuss Mitigation Alternatives (12/11)
2020	January	February	March	April	May	June	July	August	September	October	November	December
Action	Agency Meeting (1/8)	<b>CP Alternatives Carried Forward</b>  Agency Workshop to Discuss Interchange Design Alternatives (2/12)  Initial 6(f) Application received		Request for ESA Consultation Report	Agency Meeting to Discuss Proposed Preferred Alternative  Draft EFH assessment submitted (5/8)	<b>CP Preferred Alternative</b>  Section 106 determination of effect made by FHWA	NOAA receives Complete EFH Assessment to initiate EFH Consultation (7/8)  <b>Pre-Application Meeting with Agencies (Fed &amp; State)</b> Public Hearing Agency Planning Meeting  Consultation with SHPO/THPO on Preferred Alternative  Section 7 Consultation Package complete (USFWS & NMFS)	<b>Application Submittal- Individual 404 Permit/USCG</b>  Initial State Application received CAP, 401	Section 106 consultation concluded  Section 7 Conclusion of Informal Consultation/ Issuance of Biological Opinion (USFWS)  NOAA issues response to EFH assessment (9/8)  Completed 6(f) Application received	DEIS Notice of Availability  <b>Public Notice: USACE/USCG/CAP /401</b>  FWCA Review initiated	<b>Public Hearing-Joint Notice to cover all agencies</b>  FWCA Comments to USACE  Section 7 Conclusion of Informal Consultation/ Issuance of Biological Opinion (NMFS)	
2021	January	February	March	April	May	June	July	August	September	October	November	December
Action	Comments Due: 404b.1/401/CAP/USCG Agency Meeting to discuss Comments		Response to Comments due to USACE/OCRM /USCG/DHEC		401 Decision	Critical Area Permit			Coordination with/Concurrence from Officials with Jurisdiction 4(f)  Section 6(f) Issuance of Decision for Permit/Approval & NTP	<b>FEIS/ROD Approval (30 day wait period)</b> USACE Prepares Draft ROD  FHWA Approval/Conclusion of Section 4(f)	USACE Permit Decision/Signs ROD 30 days after FEIS; Complete Application submitted to USCG	USCG Permit Decision
2022	January	February	March	April	May	June	July	August	September	October	November	December
		90 Day post ROD period ends										

Public Notice must occur by 10/2 or schedule shifts

Adjustments to the proposed schedule may be made when sufficient information is available for an agency to proceed with an action so long as that action does not adversely affect the overall permitting timeline.

Unless specified, an action within a month will be completed by the end of the month.

A 10-day comment period will be requested for each Concurrence Point.

# DRAFT Section 6(f) Conversion Conference Call Notes – December 9, 2019

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## Attendees:

FHWA	Shane Belcher
SCDOT	Will McGoldrick Chad Long
SCPRT	Justin Hancock
NPS	Alexis John
Three Oaks Engineering	Heather Robbins Geni Theriot

## Conversion Process Discussion

- SCDOT summarized where we are in the process and the need for public comment on the replacement project. Parcel identification is ongoing to identify parcels to satisfy the conversion.
- The permitting timetable identifies the completed application package to SCPRT as the milestone for 6(f). This submittal will be prior to the Public Hearing.
- NPS states it is acceptable to submit the final package to SCPRT/NPS and then provide supplemental information after Public Hearing. The Community Advisory Council (CAC) will have the opportunity to vet the replacement properties prior to the official public comment period. NPS can include additional public involvement in the NPS Section 6f decision/FONSI.
- SCDOT pointed out the Section 6(f) decision is prior to ROD issuance for EIS and NPS agreed that provided enough time for the review.
- Prior to the conference call it was determined that an initiation letter was sent to SCPRT on November 6, 2019 to formally initiate Section 6(f) Coordination.

## General Discussion

- SCDOT recommends the next call with SCPRT/NPS be scheduled for March 2020.

# Agency Coordination Meeting Notes – December 11, 2019

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## Attendees:

FHWA	Shane Belcher
NOAA-NMFS	Cynthia Cooksey
NPS	Alexis John
USACE	Christopher Mims
USCG	Randall Overton
USEPA	
USFWS	Mark Caldwell
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM	Chris Stout
SCDNR	Susan Davis
SCDOT	Chris Beckham Shawn Connolly Chad Long Will McGoldrick
SCPRT	
HDR	Blair Wade
Three Oaks Engineering	Amanda Chandler Heather Robbins Geni Theriot
Wildlands Engineering	Daniel Johnson

## Purpose of the Meeting:

Discuss summary of mitigation options evaluated and path forward.

## Overview:

- HDR prepared a draft report to provide a summary of the potential mitigation sites for the I-526 West project. Revisions will be made as the alternatives design process continues and after field visits to the potential sites. Along with PRM sites, existing and potential mitigation banks that service the project area were analyzed for credit availability. Ten potential PRM sites were evaluated.
- Cainhoy currently has on-going permitting action and the cost estimates received to acquire land are prohibitive.
- Cedar Hill has risen to the top of SCDOT's watch list, but further evaluation is needed. Cedar Hill is freshwater only and a tidal component would be needed to supplement this PRM site. A site visit will be conducted of this property. NOAA-NMFS in support of combination strategy to be sure ratios are met appropriately.

- Jehossee Farm Site was proposed as a mitigation bank in a public notice on August 26, 2019 but is being considered as a PRM site for the I-526 LCC WEST project. The site includes freshwater and salt marsh/Critical Area wetlands but is located outside of the project watershed. Agencies confirmed that the watershed is not a concern and are open to pursuing this site. This site would be restoration, enhancement, and preservation.
- Daniel Island site would be salt marsh restoration. This site is being investigated for potential soil contamination. Construction and earthwork costs would be very high, estimate above \$10 million.
- James Island Dredge site needs to be further evaluated and may require testing for soil contamination. SCDNR in support of this site proposed by USFWS. SCDOT to confirm construction constraints in proximity to James Island Connector bridge piers.
- SCDNR suggested that proposed Kings Grant site is out of kind and not preferable for salt marsh mitigation.
- Agencies are supportive of phragmites control but should be a supporting component of a mitigation plan, not as a key piece of mitigation. Invasive species control would be lowest priority for potential mitigation options.
- SCDNR suggests review of Filbin Creek due to the large amount of previous impacts in the watershed.
- Agencies stated that preservation only mitigation plans for salt marsh is not preferred.
- If a portion of a proposed mitigation site is taken for PRM and used for preservation, there is no objection unless there is already a mechanism for protection in place.
- SCDNR indicated that holding Kings Grant title to salt marsh does not allow preservation of salt marsh, as the salt marsh would still require a permit to impact and are not under threat.

#### **Action Items:**

- Vet proposed sites and revise memo
- Site visits
- Refine mitigation needs with Alternatives

#### **Upcoming Events:**

- Agency Meeting – January 8, 2020 – Public Involvement Summary
- Agency Workshop – February 12, 2020 (held at Project Office in Charleston)
- Agency Meeting – March 11, 2020 – Mitigation Update

**Permittee-Responsible Mitigation Analysis attached.**



PERMITTEE-RESPONSIBLE

## MITIGATION ANALYSIS

FROM PAUL CANTRELL BOULEVARD TO VIRGINIA AVENUE  
NORTH CHARLESTON AND CHARLESTON, SOUTH CAROLINA



November 25, 2019

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## 1.1 PURPOSE

The purpose of this report is to summarize the results of a mitigation analysis for the South Carolina Department of Transportation (SCDOT) I-526 West Corridor Improvements Project (herein, Lowcountry Corridor). Impacts to waters of the US are anticipated from the project. After efforts to avoid and minimize wetland and stream impacts are considered, SCDOT must mitigate for unavoidable impacts to these resources. This report builds upon a Mitigation Needs Assessment provided to SCDOT on August 16, 2019. Based on the outcome of the Mitigation Needs Assessment, HDR evaluated potential mitigation options for the I-526 project.

This draft report was prepared to provide a summary of site selection criteria and conservation priorities, potential site constraints, long-term management considerations, and proposed recommendations for the Conceptual Mitigation Plan. The results will be presented at an Agency Coordination Meeting (ACE) on December 11, 2019. Upon conclusion of the ACE meeting and field visits, the report will be updated with findings and a final recommendation will be made.

The information provided in this report is comprised of impact estimates, preliminary conceptual designs, and cursory reviews of potential mitigation alternatives. Due to its preliminary nature, this information is intended to be used for planning purposes only.

## 1.2 PROJECT BACKGROUND AND REGULATORY FRAMEWORK

The Project includes I-526 and the intersecting roadways of Rivers Avenue, I-26, International Boulevard, Montague Avenue, Dorchester Road, Leeds Avenue, and Glenn McConnell Parkway/Paul Cantrell Boulevard in Charleston County, South Carolina. The project is anticipated to result in impacts to Waters of the U.S. (WOUS) under the jurisdiction of the U.S. Army Corps of Engineers (USACE) as regulated by Section 10 and 404 of the Clean Water Act (CWA). Tidal marsh is also regulated as “Critical Area” by the South Carolina Department of Health and Environmental Control (SCDHEC) Office of Ocean and Coastal Resource Management (OCRM). Although two Project alternatives are currently under consideration, only one set of impact estimates is provided in this memorandum as the impact footprint is nearly identical for both alternatives. The major differences between the alternatives involve traffic distribution and 2- level versus 3-level interchange designs.

Anticipated WOUS and Critical Area impacts associated with the I-526 project are predominantly located in Hydrologic Unit Code (HUC) 03050201 Cooper River watershed and the Sea Islands/Coastal Marsh Level IV ecoregion.

## 1.3 REGULATORY BACKGROUND

As previously mentioned, impacts to WOUS are anticipated as a result of the proposed project. As such, compensatory mitigation will be required by USACE. Mitigation credit estimates outlined in this memorandum are based on the Charleston District USACE 2010 Compensatory Mitigation Guidelines.

*Compensatory mitigation means the restoration (re-establishment or rehabilitation), establishment (creation), enhancement, and/or in certain circumstances preservation of aquatic resources for the purposes of offsetting unavoidable adverse impacts which remain after all appropriate and practicable avoidance and minimization has been achieved (33 CFR §332.2)*

In 2008, EPA and the US Army Corps of Engineers jointly promulgated regulations revising and clarifying requirements regarding compensatory mitigation. Under the regulations, there are three mechanisms for providing compensatory mitigation, which are listed below in order of preference as established by the regulations:

- mitigation banks
- in-lieu fee programs
- permittee-responsible mitigation (PRM)

This order is known as the mitigation hierarchy. South Carolina does not currently operate in-lieu fee programs; therefore, this analysis focuses on mitigation banks and PRM.

This section summarizes the estimated impacts to waters of the U.S. associated with the Lowcountry Corridor project (Project) and provides the estimated mitigation credit need in accordance with the USACE Charleston District’s 2010 “Guidelines for Preparing a Compensatory Mitigation Plan” (Guidelines). The memorandum also provides information regarding the availability of compensatory mitigation credits servicing the project area.

Tables 2-1 through 2-2 provide estimates of stream and wetland impacts and mitigation requirements for the Project. HDR used preliminary designs to estimate wetland and stream mitigation needs based on estimated impacts. Estimates are expected to decrease as designs are developed and finalized. The 25’ drainage offset line was used to set the permanent impact boundary. In areas where a drainage line was not present, slope stake lines set the impact boundary. In areas lacking drainage and slope stake lines, proposed right of way or existing right of way was used to set the impact boundary. Temporary clearing impacts were assigned to wetlands and streams located between the permanent impact boundary line and the proposed right of way line to account for impacts related to installing erosion control measures. Shading impacts were assigned to streams and wetlands underneath proposed bridges. Clearing impacts were assigned to streams and wetlands located within the I-526/I-26 intersection because the majority of these resources could be temporarily impacted during construction of the flyovers.

Table 2-1 Required Wetland Mitigation Estimate

	Freshwater		Tidal		
	Permanent Fill	Clearing/NPDES	Permanent Fill	Clearing	Shading
Impact Area (acres)	18.76	30.37	2.71	5.93	17.32
<b>Total</b>	<b>49.13</b>		<b>25.96</b>		

Table 2-2 Required Stream Mitigation Estimate

	Freshwater	
	Pipe	Shade/Clear
Impact LF	6,441	5,997

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## 3.0 EXISTING AND PENDING MITIGATION BANKS

Information provided in this memorandum is comprised of information obtained from publicly-available sources, including the USACE Regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS), as of August 2, 2019. The project area was reviewed for mitigation banks currently servicing the project watershed. Table 3-1 summarizes the mitigation banks identified as having credits available to service the Project. Anticipated WOUS and Critical Area impacts associated with the Project are predominately located in Hydrologic Unit Code (HUC) 03050201 Cooper River watershed and Sea Islands/Coastal Marsh Level IV ecoregion. A small portion of the project south of Ashley River Road (SC 61) is located in HUC 03050202.

Table 3-1 Mitigation Bank Availability Summary

Mitigation Bank	Service Area	Available Credits			Notes/Status
		Freshwater Wetlands	Freshwater Streams	Critical Area Wetlands	
<b>Approved Mitigation Banks</b>					
Caton Creek Mitigation Bank	Primary	59	12,000	N/A	Bank Owned and Operated by HDR Inc.
Clydesdale Club	Tertiary	N/A	N/A	330	Past litigation & agency concern
Murray Hill	Tertiary	N/A	N/A	Unknown	Associated with Clydesdale Club Mitigation Bank
Palmetto Umbrella Mitigation Bank: Big Run Site	Primary	715	32,965	N/A	
Congaree Carton	Primary	1	N/A	0	Sold Out
Pigeon Pond	Secondary	0	N/A	N/A	Sold Out
SCDOT Huspa Creek – East Marsh Site	Primary	N/A	N/A	205	SCDOT owned bank
Swallow Savannah	Primary	0	N/A	N/A	Sold Out
<b>Pending Mitigation Banks</b>					
Brosnan Forest Coldwater Branch	Tertiary	Unknown	Unknown	N/A	Pending; Public Notice dated 1/2019
Caw Caw Swamp	Secondary	Unknown	Unknown	Unknown	Pending; Public Notice dated 1/2015
Daniel Island Mitigation Bank	Primary	N/A	N/A	Unknown	Pending; Public Notice dated 1/2017; SC Ports Authority is Sponsor
French Quarter Creek	Tertiary	Unknown	Unknown	N/A	Pending; Public Notice dated 2/2019

Mitigation Bank	Service Area	Available Credits			Notes/Status
		Freshwater Wetlands	Freshwater Streams	Critical Area Wetlands	
Halidon Hill	Primary	Unknown	Unknown	Unknown	Pending; Public Notice dated 8/2019
Robert F Haggerty – Jehossee Farm	Primary	Unknown	Unknown	Unknown	Pending; Public Notice 8/2019
Point Farm Salt Marsh Bank	Primary	N/A	N/A	Unknown	Pending; Public Notice dated 11/2018
Poplar Grove	Secondary	Unknown	N/A	N/A	Pending; Public Notice dated 12/2012
Swamp Thing	Tertiary	Unknown	Unknown	Unknown	Pending; Prospectus dated 4/2017

HDR used the landscape scale and watershed approach when identifying potential mitigation sites, by considering watershed priorities and existing protected properties. HDR also met with local conservation organizations and mitigation organizations to identify conservation priorities in the project area.

### 4.1 POTENTIAL MITIGATION SITES

HDR used GIS to analyze potential properties that could provide PRM for the project. Initial assessments of the search area were completed to identify potential PRM sites using a high-level evaluation of aquatic, terrestrial, recreational, cultural and historical resources. GIS data utilized in this screening process included the following:

- National Wetland Inventory (NWI) Mapping
- National Hydrography Dataset (NHD) Mapping
- United States Geological Survey (USGS) Quadrangles
- Aerial imagery
- Provided delineation or mitigation shapefiles

#### 4.1.1 Cainhoy Plantation North

Cainhoy Plantation is a proposed mixed-use development on a 9,375 acre tract in Berkeley County, South Carolina. Approximately 4,547 acres of wetlands are located on the tract. The property is divided by Clements Ferry Road, and the northern portion of the property, or Cainhoy Plantation North, contains approximately 2,478 acres of wetlands and 97,409 linear feet of freshwater and tidal streams.

A public notice was issued by the USACE for the project on March 21, 2018. According to the public notice, approximately 187.9 acres of freshwater wetlands and 2.65 acres of tidal wetlands, or Critical Area, would be impacted by the project. The public notice includes an onsite PRM plan, which includes the creation of the 585-acre Point Hope Nature Sanctuary in Cainhoy Plantation North. The developer also proposes to preserve all remaining wetlands unimpacted by the project.

Cainhoy Plantation North was evaluated as a potential PRM site for the Lowcountry Corridor Project. Delineated wetland and stream boundaries were provided to HDR and were used to assess the site. Wetlands within the Point Hope Nature Sanctuary were estimated based on permit drawings within the USACE public notice.

#### Advantages:

- Approximately 752 acres of Salt Marsh/Critical Area wetlands are present onsite, with 26 acres suitable for restoration/enhancement.
- Approximately 1,736 acres of freshwater wetlands are present onsite.
- Federal and state agencies and conservation organizations have expressed interest in preservation of property.
- The permit application demonstrates threat of development.

- Proximity to federal protected lands owned by US Forest Service.

**Constraints:**

- Cost per acre is high because of development potential and would acquiring site may be cost prohibitive for SCDOT.
- The status of permit application is unknown.
- Acquiring property and preparing mitigation plan may exceed Lowcountry Corridor project schedule.
- Portions of site are not under threat as they are proposed as the Point Hope Nature Sanctuary, and may generate fewer credits. Site developer plans to preserve remaining wetlands which further minimizes threat.

### 4.1.2 Cedar Hill

Cedar Hill is the largest privately-owned plantation on the Cooper River in Berkeley County, South Carolina. Cedar Hill is 3,488 acres and unencumbered by conservation easements. Cedar Hill was evaluated as a potential PRM site for the Lowcountry Corridor Project. The parcel boundary was estimated based on Berkeley County GIS and NWI and NHD boundaries were used to assess the site for mitigation opportunities.

**Advantages:**

- 1,296 acres of wetlands and 62,447 linear feet of streams may be present on the site based on NWI and NHD boundaries.
- Federal and state agencies and conservation organizations have expressed interest in preservation of property.
- Proximity to federal protected lands owned by US Forest Service.

**Constraints:**

- Site is located outside of OCRM Critical Area. Freshwater marsh would be preserved, which is out-of-kind with proposed salt marsh/Critical Area impacts.
- Site does not meet the stream mitigation need.
- Property is listed as Under Contract.

### 4.1.3 Kings Grant

Kings Grant is an existing mitigation site located on the Ashley River in Dorchester County owned and operated by Open Space Institute. Portions of the former golf course are being restored into marsh as part PRM for other projects in the Cooper River watershed. The western portion of the site is the final phase of the project and was evaluated as a potential PRM site for the Lowcountry Corridor Project.

HDR used existing wetland boundaries and potential restoration areas provided by Open Space Institute to assess the site for mitigation opportunities. The site is located outside of OCRM Critical Area boundary and waters in this area are brackish. Credit generation may be reduced if the waters are determined to be freshwater instead of salt marsh/Critical Area.



**Advantages:**

- Site would contain 17 acres of existing wetlands which may be enhanced to meet Salt Marsh/Critical Area mitigation needs. Approximately 34 acres of the property could be restored to tidal wetlands based on initial elevation data (elevations less than 3.5 ft NAVD88, which were identified as areas that would be tidally flooded and potential restoration areas without grading).
- Adjacent lands have already been used as mitigation sites, so there is a precedence of mitigation activities in this area.

**Constraints:**

- Site does not meet the freshwater wetland mitigation need or produce stream mitigation.

#### 4.1.4 Gippy Plantation

Gippy Plantation is an 800-acre property on the northwestern bank of the Cooper River located in between Fort Fairlawn and Lewisfield Plantation in Berkeley County, South Carolina. The property contains approximately 330 acres of historic rice fields and freshwater wetlands protected by a 330-acre conservation easement. Built in the 1850s, Gippy Plantation was identified as eligible for the National Register of Historic Places in 1971 for its mid-19th century architecture, and in a 1989 survey of historic resources in Berkeley County.

A residential development was proposed on Gippy Plantation, but in April 2019, the Town of Moncks Corner Planning Commission voted 4 to 2 to recommend denial to annex Gippy Plantation into the town and rezone the property to PUD. The developers subsequently decided to pull their annexation and zoning request instead of moving forward to Town Council.

Gippy Plantation was evaluated as a potential PRM site for the Lowcountry Corridor Project. NWI and NHD boundaries were used to estimate mitigation potential. A conservation easement boundary shapefile was provided to HDR.

**Advantages:**

- Site contains approximate 245 acres of freshwater wetlands outside of the conservation easement, with the potential for restoration, enhancement, and preservation.
- The site contains 12,466 linear feet of streams based on NHD layers, with the potential for preservation and enhancement.
- Conservation organizations have expressed interest in preservation of property.
- The recently denied permit application demonstrates threat of development.
- Proximity to protected lands at Lewisfield Plantation.

**Constraints:**

- Site does not meet the freshwater wetland or stream mitigation need. Salt marsh credits are not available at this site.
- A large portion of the site (330 acres) is not under threat as they are protected by a conservation easement as a result of an enforcement action.

### 4.1.5 Halidon Hill Mitigation Site

Halidon Hill Mitigation Bank was proposed by Halidon Hill Mitigation Bank, LLC in August 2019. SCDOT is considering use of the proposed bank as a PRM site. The proposed project consists of establishing a freshwater wetland and stream mitigation bank in the Cooper River watershed (8-digit Hydrologic Unit Code 03050201) located in the Level III Middle Atlantic Plains Ecoregion. Based on the public notice, the proposed 1,744.5-acre mitigation site includes approximately 1,074.6 acres of wetlands, 22.8 acres of non-wetland waters (or streams), and 647.1 acres of uplands. The proposal is to preserve 175.14 acres of freshwater wetland and 802 linear feet of stream. In addition, 222.93 of freshwater wetlands will be enhanced through removal of loblolly pine and replanted with native hardwood species. 94.36 acres of wetland will be enhanced through filling ditches, breaching/removal of berms, removal of roads and culverts, and installation of bridges or low flow crossings. 418.81 acres of wetland will be enhanced through removal of loblolly pine, replanting native species, and removing hydrological impairments. 16.91 acres of freshwater wetland will be restored by removal of loblolly pine and restoring natural hydrology. 21,881 linear feet of stream will be restored through removal of undersized culverts, bank stabilization, and construction of a new channel.

#### Advantages:

- 1,074.6 acres of freshwater wetlands and 22.8 acres of non-wetland waters are present on the site.
- SC Conservation Bank interest in preservation of site.

#### Constraints:

- Salt marsh credits are not available at this site.
- Portion of site under a conservation easement.

### 4.1.6 Fairlawn Expansion

Fairlawn Plantation is located near the Wando River, west of Awendaw, in Charleston County. In 2014, the Open Space Institute Land Trust Inc. and The Nature Conservancy purchased 2,241 acres as part of the Boeing facility mitigation. The property will be turned over to the U.S. Forest Service. The parcels evaluated include approximately 869 acres comprising of Tax Map Number 6250000040, 6250000087, and 6250000005 near Guerins Bridge Road and the Francis Marion National Forest. The parcels are also located adjacent to the existing Congaree Carton Mitigation Bank, which has produced freshwater and salt marsh/Critical Area mitigation credits.

Based on NWI and NHD mapping, the parcels contain approximately 95 acres of salt marsh/Critical Area, 362 acres of freshwater wetlands, and 8,800 linear feet of tidally-influenced streams.

#### Advantages:

- Proximity to federal protected lands and previous mitigation sites
- Site contains a variety of freshwater and salt marsh/Critical Area resources.

#### Constraints:

- Small size in total acres and preserved wetlands and ratios will be lower than other sites, which may mean it might not cover the impacts by itself. Would have to be combined with othersites.

- Greater distance to impact site compared to other sites

### 4.1.7 Daniel Island Mitigation Site

Daniel Island Mitigation Bank was proposed by the SC State Ports Authority in January 2017. SCDOT is considering use of the proposed bank as a PRM site. According to the public notice, the proposed project consists of establishing a saltwater mitigation bank in the Cooper River watershed (8-digit Hydrologic Unit Code 03050201) in the Sea Island/Coastal Marsh Ecoregion. The 135-acre mitigation site is a portion of a former confined disposal facility and prior to 1970 was used to manage dredged material. During the 1980s and 1990s, the majority of the mitigation site was plowed and planted with row crops on an annual basis. However, farming activities were discontinued more than 10 years ago. According to the Prospectus, the mitigation site consists of 25.67 acres of existing salt marsh and 109.09 acres that were used for the placement of dredged material and farming activities.

The proposed mitigation work plan consists of removing the existing vegetation and excavating 105.35 acres in order to create the elevations necessary to establish tidal creeks, low marsh, and high marsh on the mitigation site. Once the appropriate elevations are established, salt marsh vegetation would be planted within the low marsh and high marsh restoration areas and natural tidal flows would inundate the mitigation site twice daily.

#### Advantages:

- Over 130 acres of existing salt marsh and Salt marsh/Critical area restoration on the site.

#### Constraints:

- Freshwater wetland credits are not available at this site.
- Sediment testing for contaminants ongoing.
- Construction costs for earthwork are cost prohibitive.

### 4.1.8 Berkeley County Timber Sites

The Berkeley County Timber Sites include properties surrounding the existing Big Run Mitigation Site, which is part of the approved Palmetto State-wide Umbrella Mitigation Bank. The Berkeley County Timber Sites are approximately 15,805 acres owned by private timber management companies. The sites include freshwater wetlands and streams in the Cooper River watershed (8-digit Hydrologic Unit Code 03050201) in the Lower Coastal Plain Ecoregion. NWI and NHD boundaries were used to estimate mitigation potential. The site contains approximately 120,934 linear feet of streams and 2,545 acres of freshwater wetlands.

#### Advantages:

- Proximity to an existing mitigation bank and protected lands.
- Sites are located in headwaters of Ashley/Cooper watershed.

#### Constraints:

- Salt marsh/Critical Area credits are not available at this site.

### 4.1.9 James Island Dredge Island Restoration

Based on Google Earth mapping, an approximately 28-acre dredge disposal island is located on the James Island Connector in Charleston County near the SC 61 exit. USFWS recommended review of this site for mitigation opportunities. Based on aerial mapping, approximately 9 acres and 4 acres of salt marsh/Critical area could be restored and enhanced, respectively. Topographic survey of the dredge disposal and installation of tide gages would be necessary to refine restoration and enhancement areas.

#### Advantages:

- Agency interest in restoration of property.
- Salt marsh/Critical area credit generation.

#### Constraints:

- Freshwater wetland credits are not available at this site.
- Sediment testing for contaminants may be required as a former dredge disposal.
- Construction costs for earthwork may be cost prohibitive.

### 4.1.10 Jehossee Farm Mitigation Site

The Robert F. Hagerty Coastal Mitigation Bank – Jehossee Farm Mitigation Site was proposed as a mitigation bank in a public notice on August 26, 2019. SCDOT is considering use of the proposed bank as a PRM site. The Jehossee Farm Site is approximately 485 acres and would provide a total of 453.08 acres of estuarine emergent and palustrine forested wetlands. This total includes 266.38 acres of estuarine emergent wetland preservation, 28.16 acres of palustrine forested wetland preservation, 18.13 acres of estuarine emergent wetland restoration, 44.83 acres of estuarine emergent wetland enhancement, 5.20 acres of estuarine salt shrub thicket restoration, and 82.13 palustrine forested wetland restoration. In addition, the project will include 17.38 acres of Bird Management Area (BMA) preservation. Estuarine emergent wetland areas (i.e. coastal marsh) include tidal creeks and sub-tidal bottom habitats.

The Jehossee Farm Site is located on the hydrologic break between two watershed cataloging units: (1) South Edisto River – Atlantic Intracoastal Waterway (12-digit HUC 030502060308); and (2) Dawho River-North Edisto River (12-digit HUC 030502060405). The proposed primary service area extends to Charleston and would include the proposed I-526 Lowcountry Corridor project.

#### Advantages:

- Site includes freshwater and salt marsh/Critical Area wetlands.

#### Constraints:

- Mitigation Site is located outside of project watershed.
- Site does not include streams.

## 4.2 CONSERVATION AGENCY AND MUNICIPAL CORRESPONDENCE

Conservation agencies were contacted to determine if they have identified specific properties or high-interest areas that may be suitable as potential PRM sites or coastal restoration projects. The following is a summary of entities contacted and potential mitigation projects.

### 4.2.1 SC Department of Natural Resources (DNR)

One of DNR's priorities is to create living shorelines through oyster bed restoration projects and/or marsh plantings. SCDNR's South Carolina Oyster Recycling and Enhancement Program (SCORE) is a community-based habitat restoration and monitoring program. On October 21<sup>st</sup>, 2019 HDR held a conference call with several staff from DNR (Ben Dyar, Michael Hodges, Peter Kingsley-Smith, and Gary Sundin). Per DNR staff, there are ample locations within Charleston County in need of such work. The cost for such projects depends on the specific project's restoration goal and therefore the methods employed to accomplish the goal. The cost ranges are shown in Table 4-1. The shell bags and marsh plantings have a volunteer component to them adding to the community involvement and outreach and education.

Table 4-1 Oyster Bed Restoration Costs

Project Type/Method	Cost per Acre
Loose Shell Planting	\$150k-180k
Shell Bag Planting	\$225k
Marsh Planting	\$100k-150k

### 4.2.2 NOAA National Marine Fisheries Service

On October 17<sup>th</sup> HDR spoke with Cyndi Cooksey with NOAA's Habitat Conservation Division concerning their priority areas. NOAA has an interest in improving Filbin Creek, which is a tributary into the Cooper River that runs along Interstate 526 within the Project area. There are opportunities to improve tidal connectivity and overall water quality in Filbin Creek.

### 4.2.3 City of Charleston

The City of Charleston recently published their Final Report associated with the Dutch Dialogues. In reviewing the report, the City of Charleston is looking at opportunities to expand the Newmarket Creek watershed to improve drainage, water storage potential, and environmental quality. Specifically it was suggested that Newmarket Creek is daylighted and that the intertidal zone under Septima Clark should be improved to manage tidal impacts.

### 4.2.4 City of North Charleston

Over the years the City of North Charleston has focused on revitalizing the southern end of the city which includes Noisette Creek. The Noisette Community Master Plan includes recommendations for restoring natural systems in the focus area. As outlined in the plan, there are ample opportunities to restore Noisette Creek as well as portions of Filbin Creek. In 2009, the City of North Charleston applied for a grant to fund the 'Restoring Wetlands in Noisette Creek' project. This project identified 8 restoration areas (Figure 11 in Appendix A). The project would result in the restoration of 9.5 acres of wetlands and 2,400 feet of restored creek channel. The overarching goal of the project is to enhance and restore the Noisette Creek watershed.

### 4.2.5 SCDOT Invasive Species Control

*Phragmites australis* is a non-native reed that can crowd out native vegetation in marsh or estuary habitats. *Phragmites* management has occurred on Filbin Creek in the past. As a potential mitigation measure, SCDOT would fund *Phragmites* management for up to 3,500 acres of wetlands and marsh.

Herbicide applications may occur using aerial, aquatic and land-based equipment and may be considered when environmental factors, such as large spray areas, topography and site access, may hinder the ability to spray target plant species. Both airplanes and helicopters have been used traditionally for aerial herbicide applications. Implementation of drone aerial herbicide applications can also be used for targeted spraying. Vegetation monitoring methods typically include direct stem counts or percent aerial cover estimates for established vegetation plots in terrestrial environments. Access to these plots is often challenging because of their remote location, topography, dense vegetation or environmental factors, such as the presence of sensitive communities.

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Table 5-1 provides a summary of the sites identified for potential PRM. Mitigation estimates, advantages and constraints were identified based on GIS mapping, professional judgment, and readily available data sources. Field verification of jurisdictional resources will reveal discrepancies when compared with data depicted within this document. In addition to the sites identified, SCDOT will continue to consider contributions to the SCDNR SCORE program as well as other conservation and municipal restoration initiatives.

Constraints associated with Cainhoy Plantation North, Gippy Plantation, Daniel Island Mitigation Bank, James Island Dredge Island would limit the potential for these sites to provide mitigation within the project schedule and budget. Based on the initial analysis, a combination of mitigation sites may be necessary to meeting mitigation needs for the project. Cedar Hill and Kings Grant sites have the potential to meet freshwater and tidal mitigation needs of this project and are within the watershed. HDR recommends an on-the-ground reconnaissance of these sites in an effort to determine accurate existing conditions of its resources. An evaluation of on-site conditions will allow for a more accurate determination of potential credit generation and identification of potential fatal flaws that may render a site unusable. Additionally, discussions with landowners will provide SCDOT an opportunity to discern their interests in selling property (or an easement on the property), which is a critical step in determining each site's feasibility to provide anticipated mitigation needs.

If constraints are identified for Cedar Hill and Kings Grant, other sites identified in this report have the ability to meet project mitigation needs, including Halidon Hill Mitigation Site, Fairlawn Expansion, Berkeley County Timber Sites, and Jehossee Farm Mitigation Site. Discussion during the December 11, 2019 Agency Coordination Effort meeting will be documented and appended to this report.



Table 5-1 PRM Site Summary

Site Name	County	Site Acreage	Freshwater Streams (LF)	Estimated Salt Marsh/Critical (AC)	Estimated Freshwater Wetland (AC)	Advantages	Disadvantages
Cainhoy Plantation	Berkeley	5,703	65,110	752	1,736	<ul style="list-style-type: none"> <li>Agency and conservation organizations interest.</li> <li>Threat of development.</li> <li>Proximity to federal protected lands.</li> </ul>	<ul style="list-style-type: none"> <li>High cost per acre.</li> <li>Unknown permit application status.</li> <li>Project schedule.</li> <li>Portions of site are not under threat.</li> </ul>
Cedar Hill	Berkeley	3,528	62,447	0	1,296	<ul style="list-style-type: none"> <li>Agency and conservation organizations interest.</li> <li>Proximity to federal protected lands.</li> </ul>	<ul style="list-style-type: none"> <li>Site is located outside of OCRM Critical Area</li> <li>Site does not meet the stream mitigation need.</li> <li>Property is Under Contract.</li> </ul>
Kings Grant	Dorchester	104	0	51 <sup>1</sup>	0	<ul style="list-style-type: none"> <li>Precedence of mitigation activities in this area.</li> </ul>	<ul style="list-style-type: none"> <li>Site does not meet the freshwater wetland mitigation need or produce stream mitigation.</li> </ul>
Gippy Plantation	Berkeley	332	12,466	0	245	<ul style="list-style-type: none"> <li>Conservation organization interest of property.</li> <li>Threat of development.</li> <li>Proximity to protected lands at Lewisfield Plantation.</li> </ul>	<ul style="list-style-type: none"> <li>Site does not meet the freshwater wetland or stream mitigation need.</li> <li>Salt marsh credits are not available at this site.</li> <li>330 acres is already protected by a conservation easement.</li> </ul>
Halidon Hill	Berkeley	1,745	23	0	1,075	<ul style="list-style-type: none"> <li>SC Conservation Bank interest in preservation of site.</li> </ul>	<ul style="list-style-type: none"> <li>Salt marsh credits are not available at this site.</li> <li>Portion of site under a conservation easement.</li> </ul>

Site Name	County	Site Acreage	Freshwater Streams (LF)	Estimated Salt Marsh/Critical (AC)	Estimated Freshwater Wetland (AC)	Advantages	Disadvantages
Fairlawn Expansion	Charleston	869	0	95	362	<ul style="list-style-type: none"> <li>Proximity to federal protected lands and previous mitigation sites.</li> <li>Site contains a variety of freshwater and salt marsh/Critical Area resources.</li> </ul>	<ul style="list-style-type: none"> <li>Small size in total acres and preserved wetlands.</li> <li>Would have to be combined with other sites.</li> <li>Greater distance to impact site compared to other sites.</li> </ul>
Daniel Island	Berkeley	135	0	130	0	<ul style="list-style-type: none"> <li>Freshwater wetland credits are not available at this site.</li> </ul>	<ul style="list-style-type: none"> <li>Freshwater wetland credits are not available at this site.</li> <li>Sediment testing ongoing.</li> <li>High construction costs.</li> </ul>
Berkeley County Timber	Berkeley	15,805	120,934	0	2,545	<ul style="list-style-type: none"> <li>Proximity to an existing mitigation bank and protected lands.</li> <li>Sites are located in headwaters of Ashley/Cooper watershed.</li> </ul>	<ul style="list-style-type: none"> <li>Salt marsh/Critical Area credits are not available at this site.</li> </ul>
James Island Dredge	Charleston	28	0	13	0	<ul style="list-style-type: none"> <li>Agency interest in restoration of property.</li> <li>Salt marsh/Critical area credit generation.</li> </ul>	<ul style="list-style-type: none"> <li>Freshwater wetland credits are not available at this site.</li> <li>Sediment testing for contaminants may be required.</li> <li>High construction costs.</li> </ul>
Jehossee Farm Mitigation Site	Charleston	485	0	335	128	<ul style="list-style-type: none"> <li>Site includes freshwater and salt marsh/Critical Area wetlands.</li> </ul>	<ul style="list-style-type: none"> <li>Mitigation Site is located outside of project watershed.</li> <li>Site does not include streams.</li> </ul>

1 Site is located outside of OCRM Critical Area, but mitigation would enhance and restore tidal brackish wetlands.

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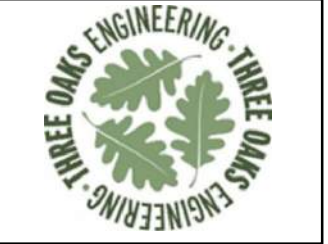
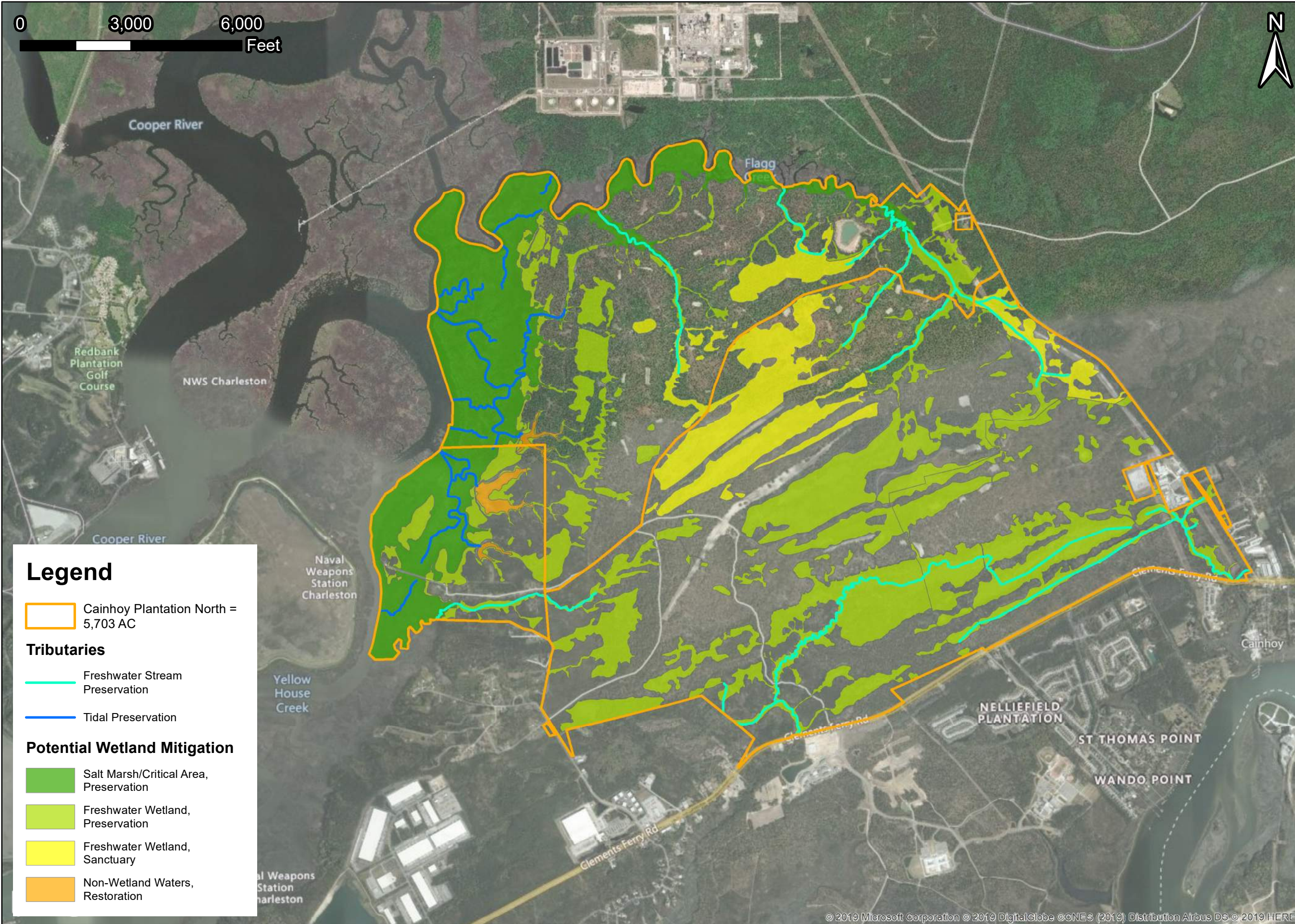


# APPENDIX A

## FIGURES

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Prepared For:

**SCDOT**

**FHWA**

**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

Cainhoy Plantation North

Berkeley County, SC

**Legend**

Cainhoy Plantation North = 5,703 AC

**Tributaries**

Freshwater Stream Preservation

Tidal Preservation

**Potential Wetland Mitigation**

Salt Marsh/Critical Area, Preservation

Freshwater Wetland, Preservation

Freshwater Wetland, Sanctuary

Non-Wetland Waters, Restoration

Date: 11/18/2019

Scale: 1:30,000

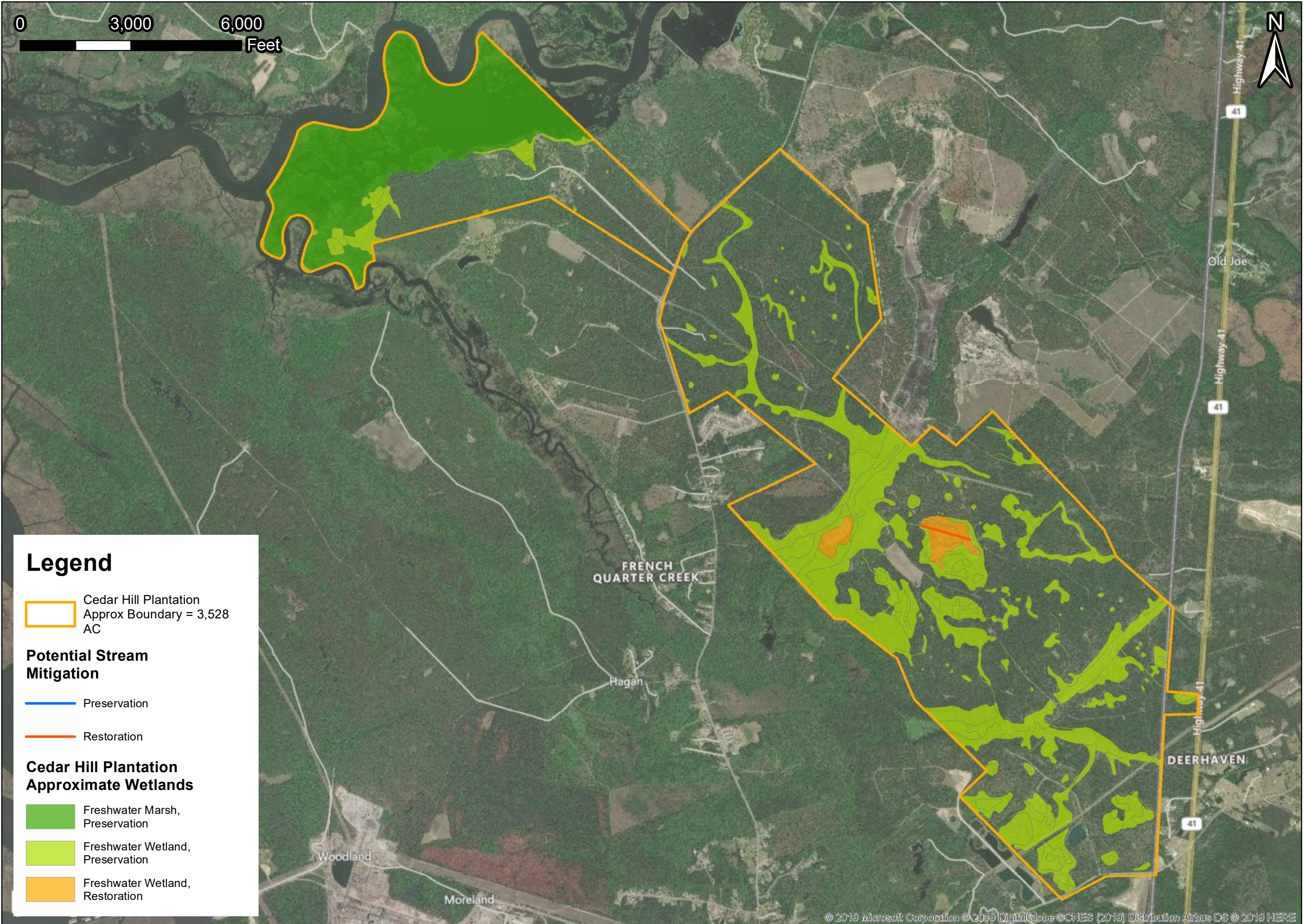
Job No.: 10045819

Drawn By: rd      Checked By: ek


Mitigation Analysis

**1**










**Legend**

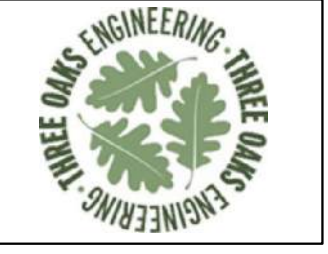
 Cedar Hill Plantation  
Approx Boundary = 3,528  
AC

**Potential Stream Mitigation**

 Preservation  
 Restoration

**Cedar Hill Plantation  
Approximate Wetlands**

 Freshwater Marsh,  
Preservation  
 Freshwater Wetland,  
Preservation  
 Freshwater Wetland,  
Restoration



Prepared For:



**I-526 LOWCOUNTRY  
CORRIDOR MITIGATION  
ANALYSIS**

Cedar Hill Plantation  
  
Berkeley County, SC

Date: 11/18/2019

Scale: 1:30,000

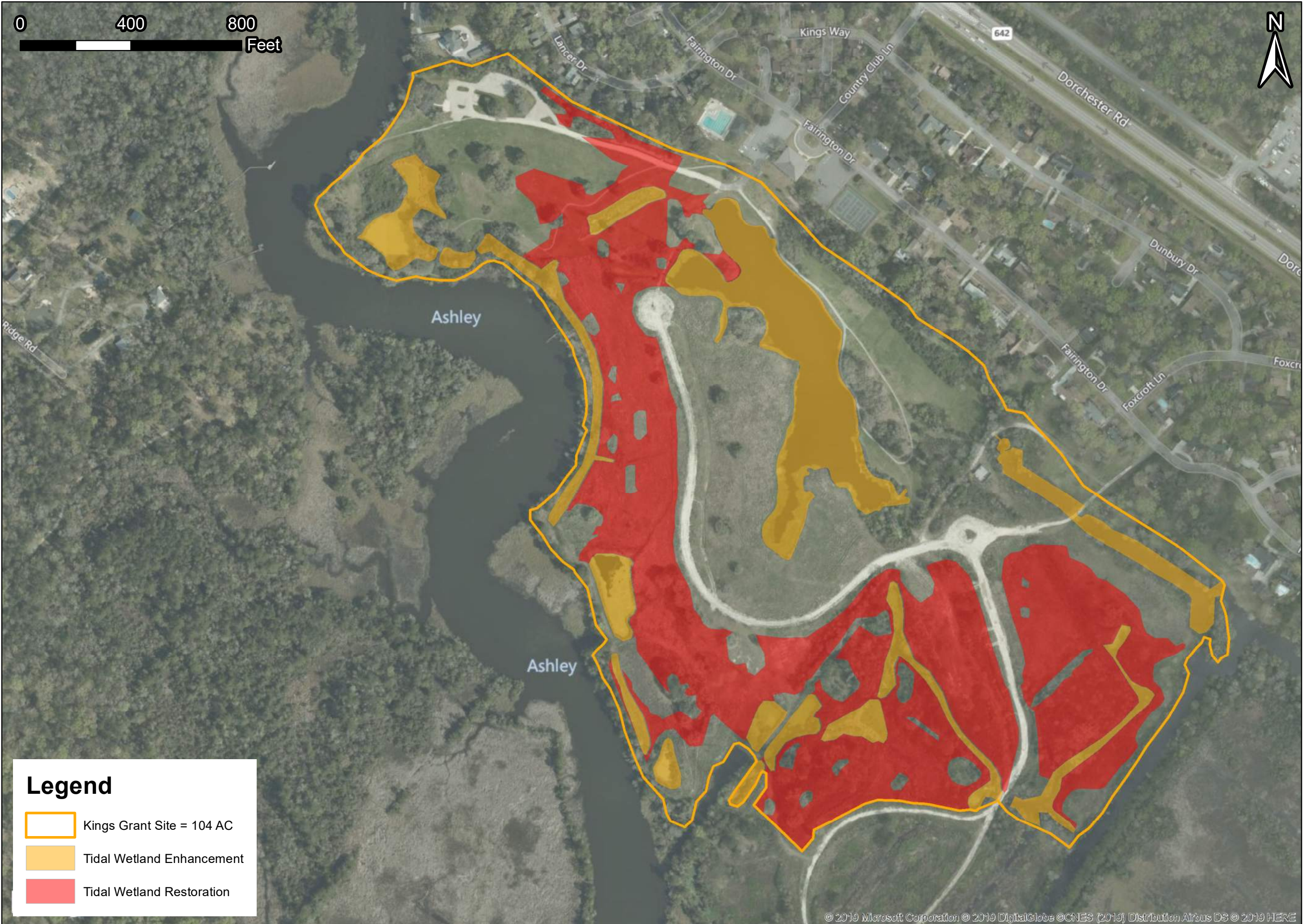
Job No.: 10045819

Drawn By: rd	Checked By: ek
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Mitigation Analysis

**2**





**Legend**

- Kings Grant Site = 104 AC
- Tidal Wetland Enhancement
- Tidal Wetland Restoration



Prepared For:

**SCDOT**

**FHWA**

**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

Kings Grant Mitigation Site

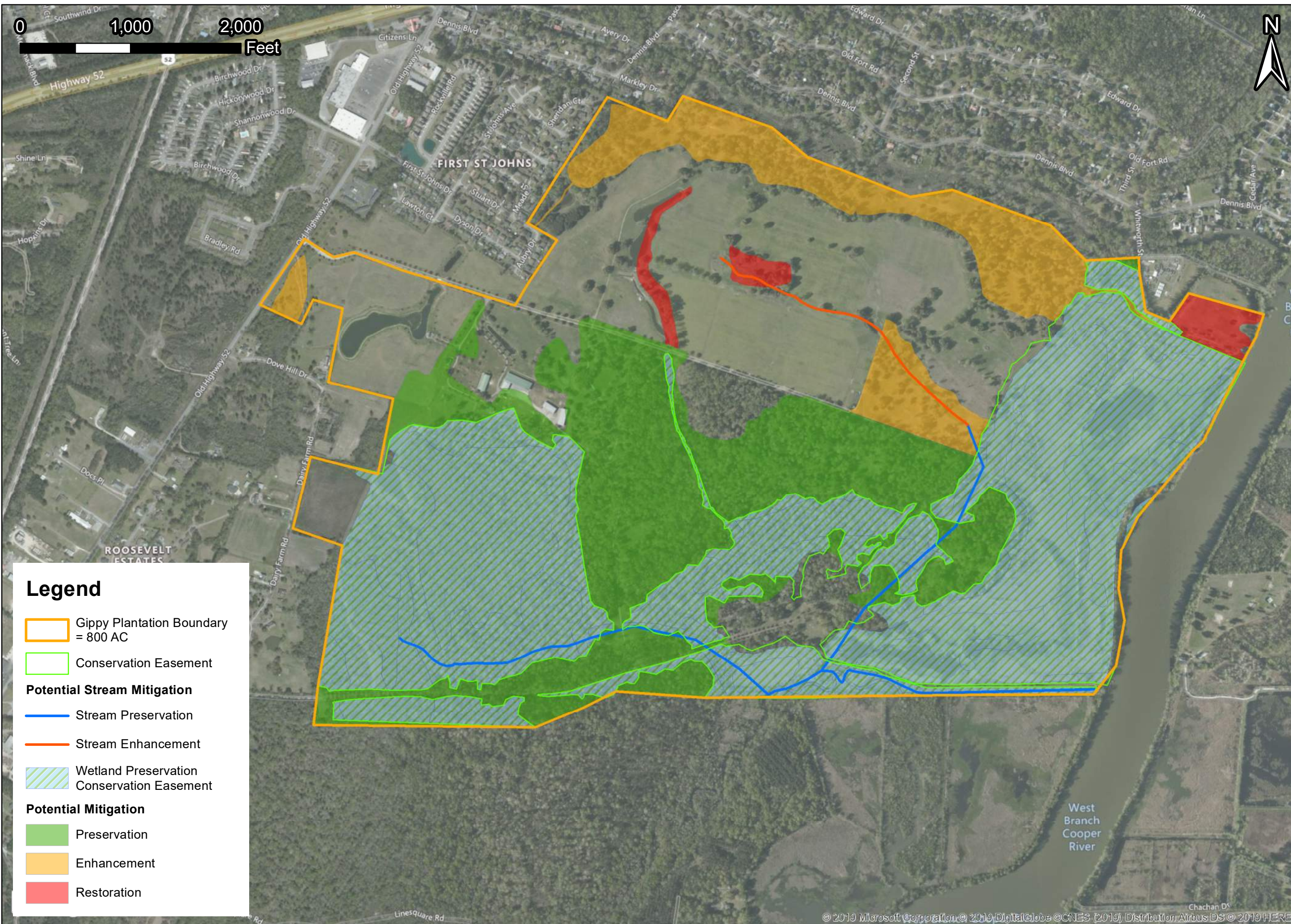
Dorchester County, SC

Date:	11/18/2019
Scale:	1:4,000
Job No.:	10045819
Drawn By:	rd
Checked By:	ek

Mitigation Analysis

**3**





**Legend**

- Gippy Plantation Boundary = 800 AC
- Conservation Easement

**Potential Stream Mitigation**

- Stream Preservation
- Stream Enhancement

**Potential Mitigation**

- Preservation
- Enhancement
- Restoration

Wetland Preservation Conservation Easement



Prepared For:

**SCDOT**

**FHWA**

**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

Gippy Plantation

Berkeley County, SC

Date:	11/18/2019
Scale:	1:10,000
Job No.:	10045819
Drawn By:	rd
Checked By:	ek

Mitigation Analysis

**4**



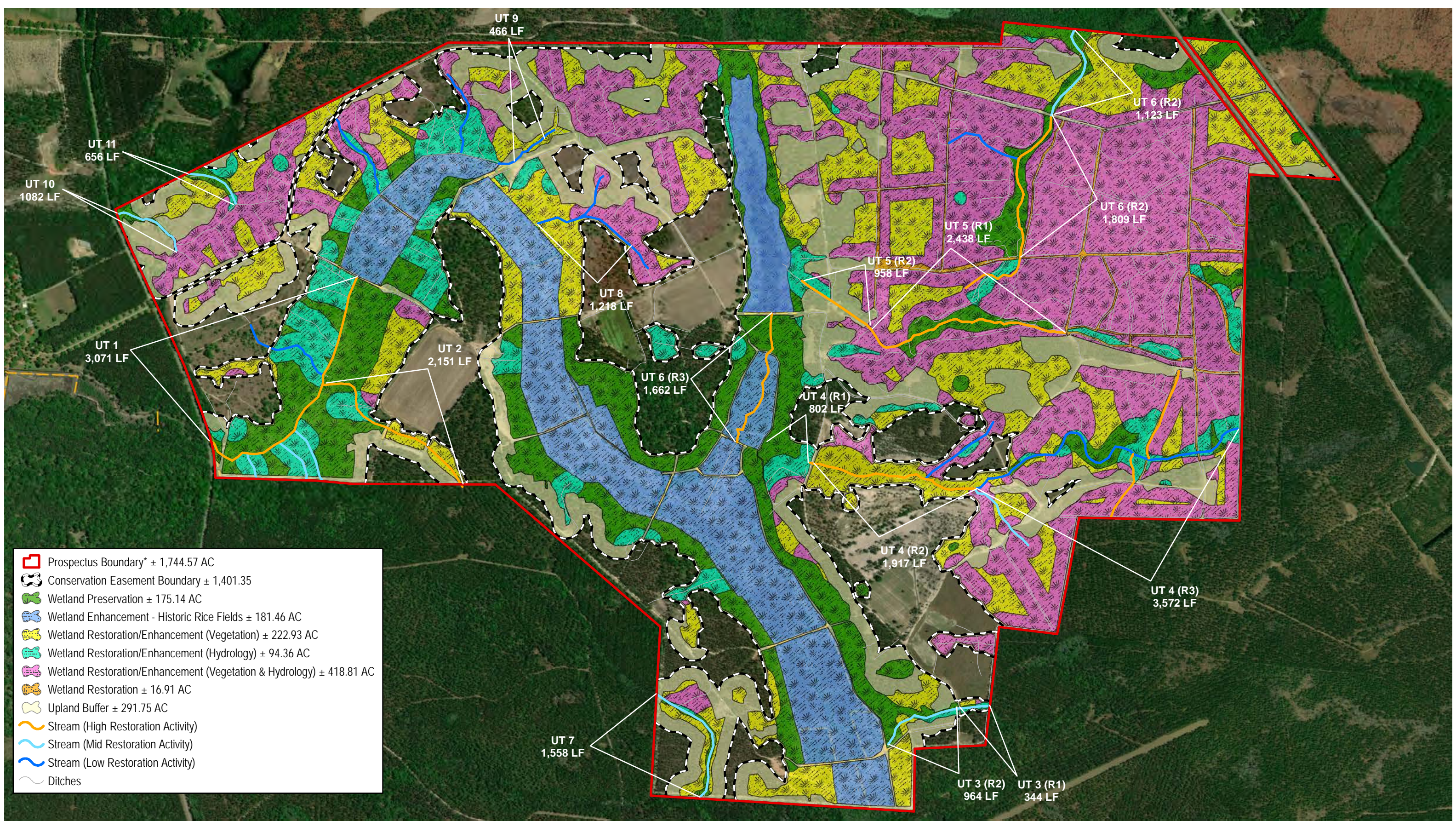
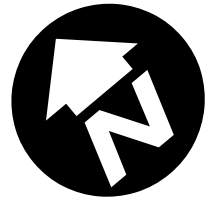
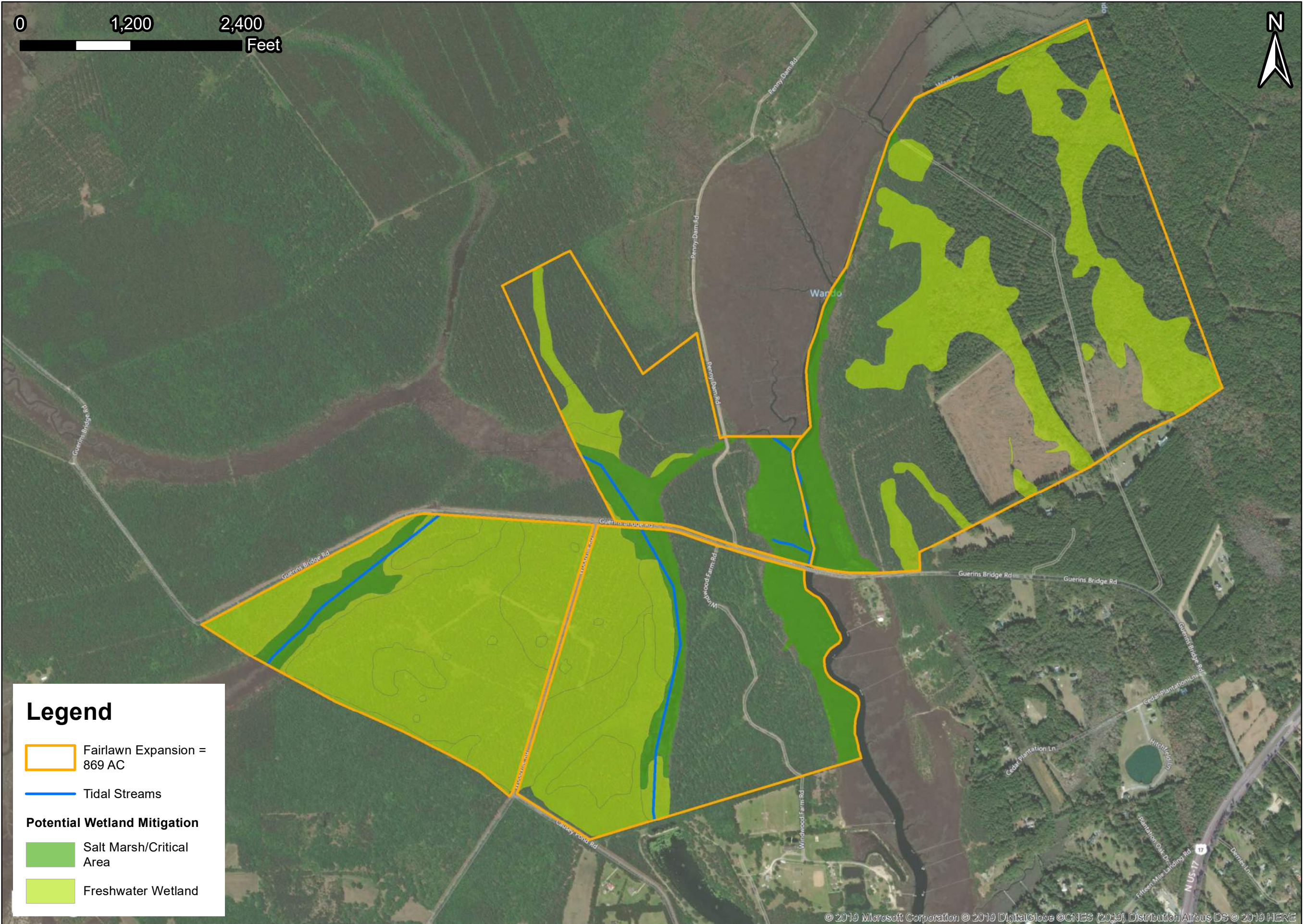


Figure 6: Mitigation Unit Map





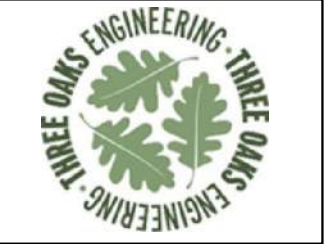


**Legend**

- Fairlawn Expansion = 869 AC
- Tidal Streams

**Potential Wetland Mitigation**

- Salt Marsh/Critical Area
- Freshwater Wetland



Prepared For:

**SCDOT**

**FHWA**

**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

Fairlawn Expansion

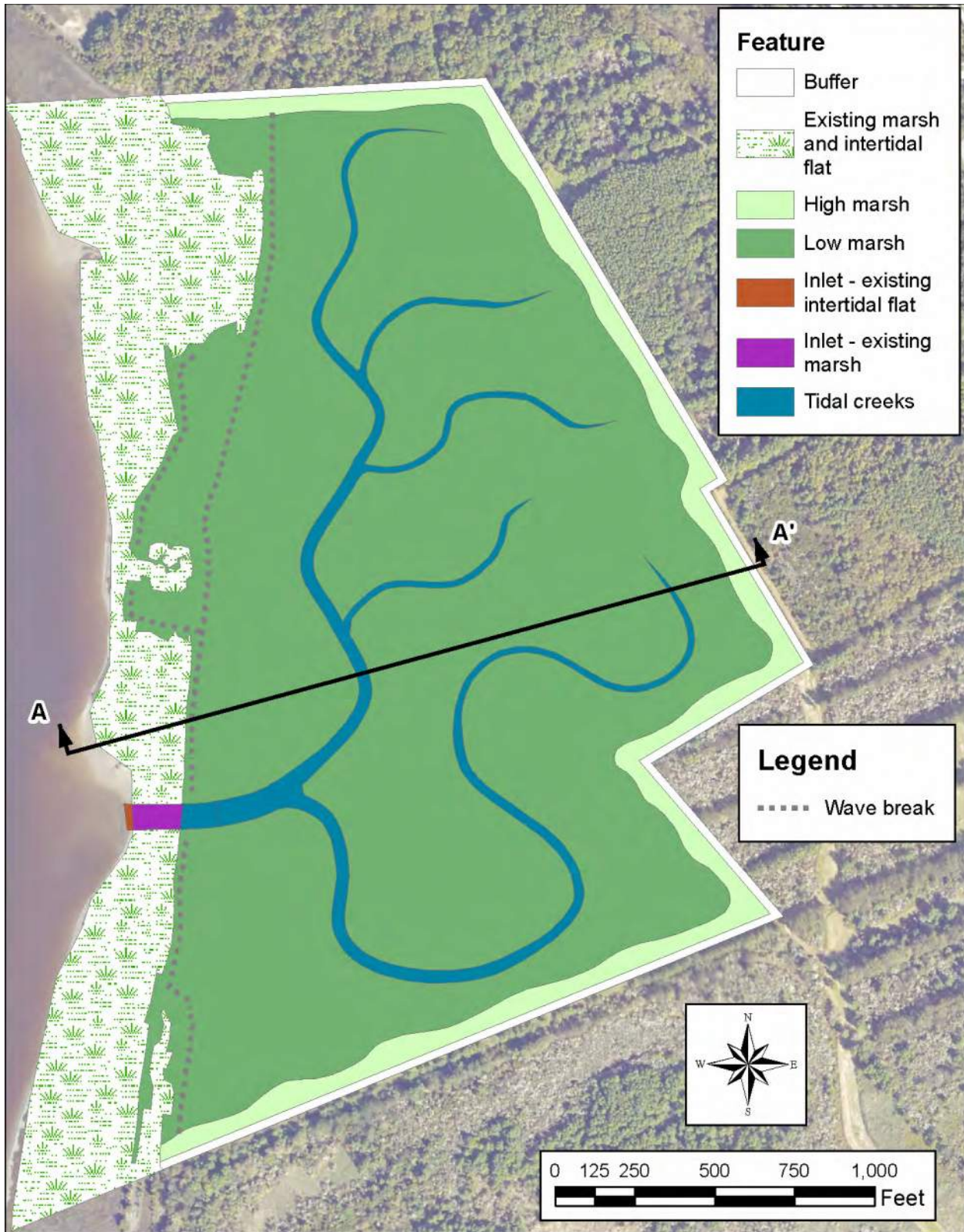
Charleston County, SC

Date:	11/18/2019
Scale:	1:12,000
Job No.:	10045819
Drawn By:	Checked By:
gm	ek

Mitigation Analysis

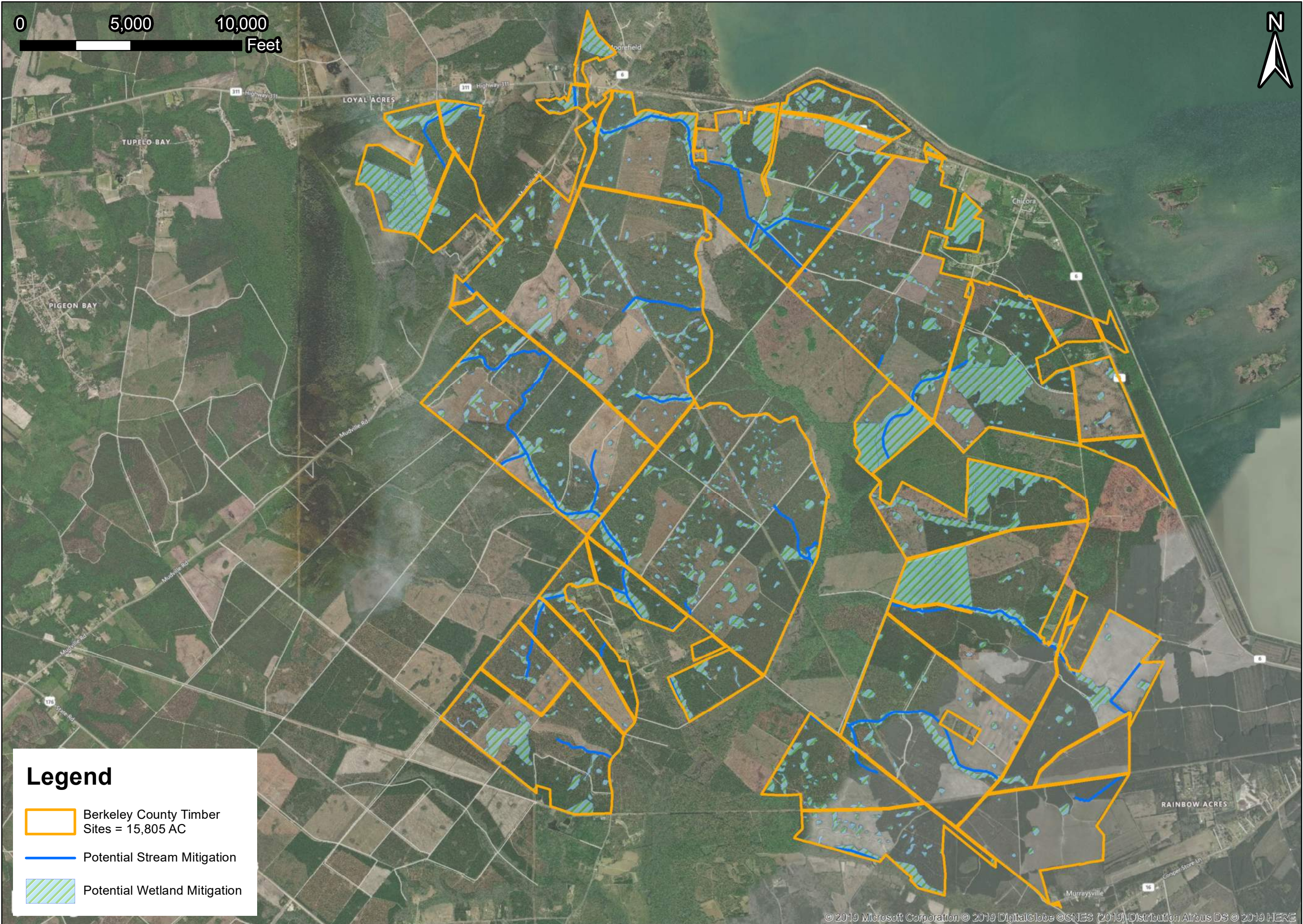
**6**








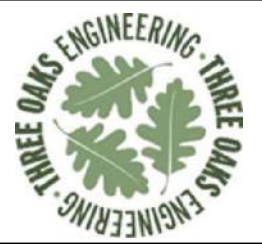
DISMB conceptual design





**Legend**

-  Berkeley County Timber Sites = 15,805 AC
-  Potential Stream Mitigation
-  Potential Wetland Mitigation



Prepared For:



**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

Berkeley County Timber Sites

Berkeley County, SC

Date: 11/18/2019

Scale: 1:50,000

Job No.: 10045819

Drawn By: gm

Checked By: ek

Mitigation Analysis

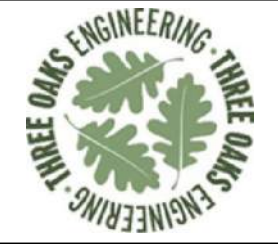
**8**





**Legend**

- James Island = 28 AC
- Potential Wetland Mitigation**
- Salt Marsh/Critical Area Enhancement
- Salt Marsh/Critical Area Restoration



Prepared For:

**SCDOT**

**FHWA**

**I-526 LOWCOUNTRY CORRIDOR MITIGATION ANALYSIS**

James Island  
Dredge Island Restoration

Charleston County, SC

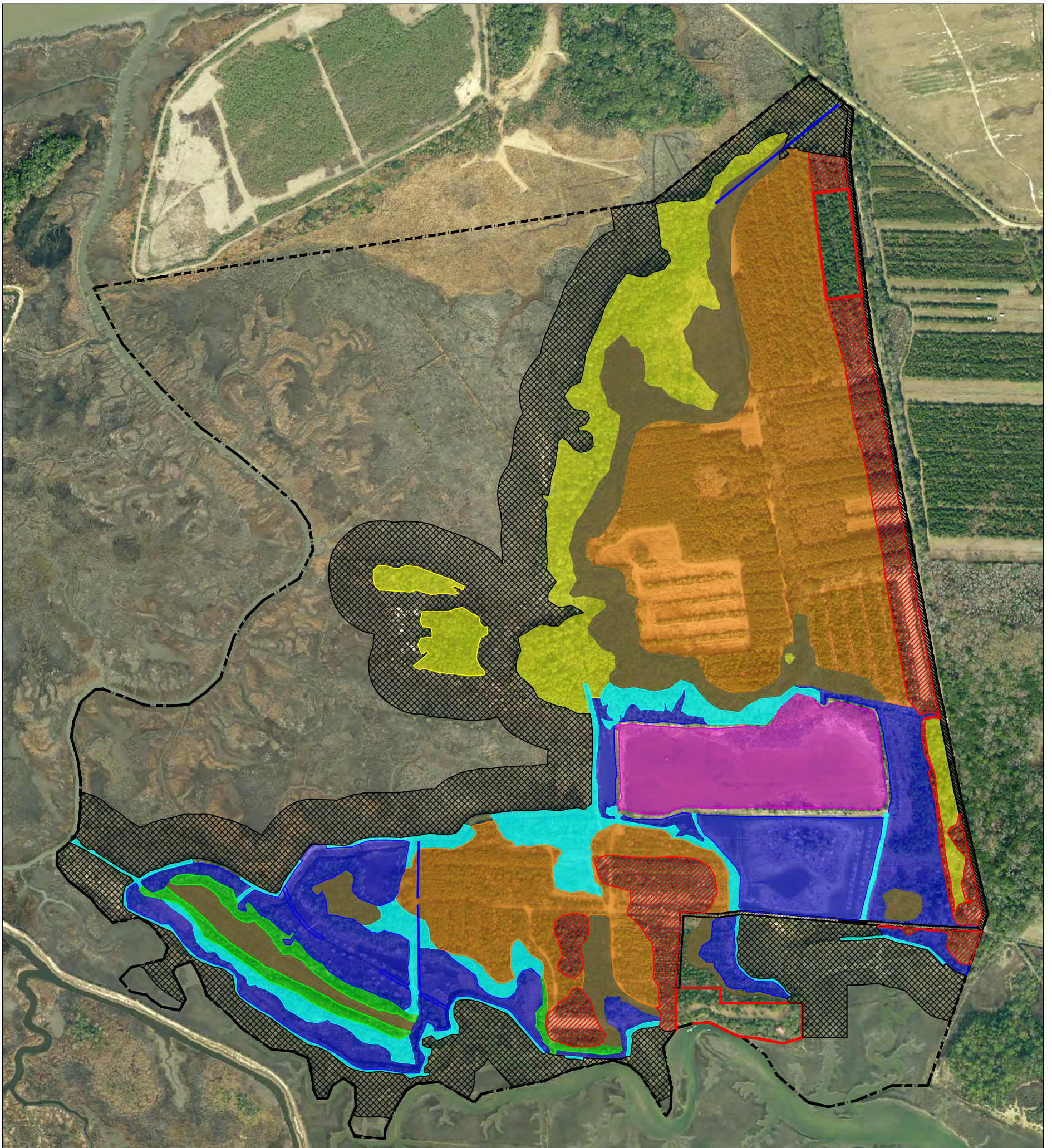
Date:	11/18/2019
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Job No.:	10045819
Drawn By:	Checked By:
gm	ek

Mitigation Analysis

**9**

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**Mitigation Unit by Type and Quantity**

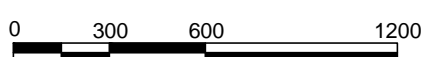
Map ID	Mitigation Unit	Resource Type	Mitigation Type	Quantity
W-1	W-1	Coastal Marsh	Restoration	(~ 18.29 ac.)
W-2	W-2	Coastal Marsh	Enhancement	(~ 44.83 ac.)
W-3	W-3	Coastal Marsh	Preservation	(~ 86.61 ac.)
W-4	W-4	Salt Shrub Thicket	Restoration	(~ 5.20 ac.)
W-5	W-5	Estuarine Fringe Forest	Restoration	(~ 28.93 ac.)
W-6	W-6	Estuarine Fringe Forest	Preservation	(~ 28.16 ac.)
W-7	W-7	Pine Flatwoods	Restoration	(~ 82.13 ac.)
W-8	W-8	Bird Management Area	Preservation	(~17.38 ac.)
U-9	U-9	Upland Buffer	Preservation	(~9.85 a.c.)

**Legend**

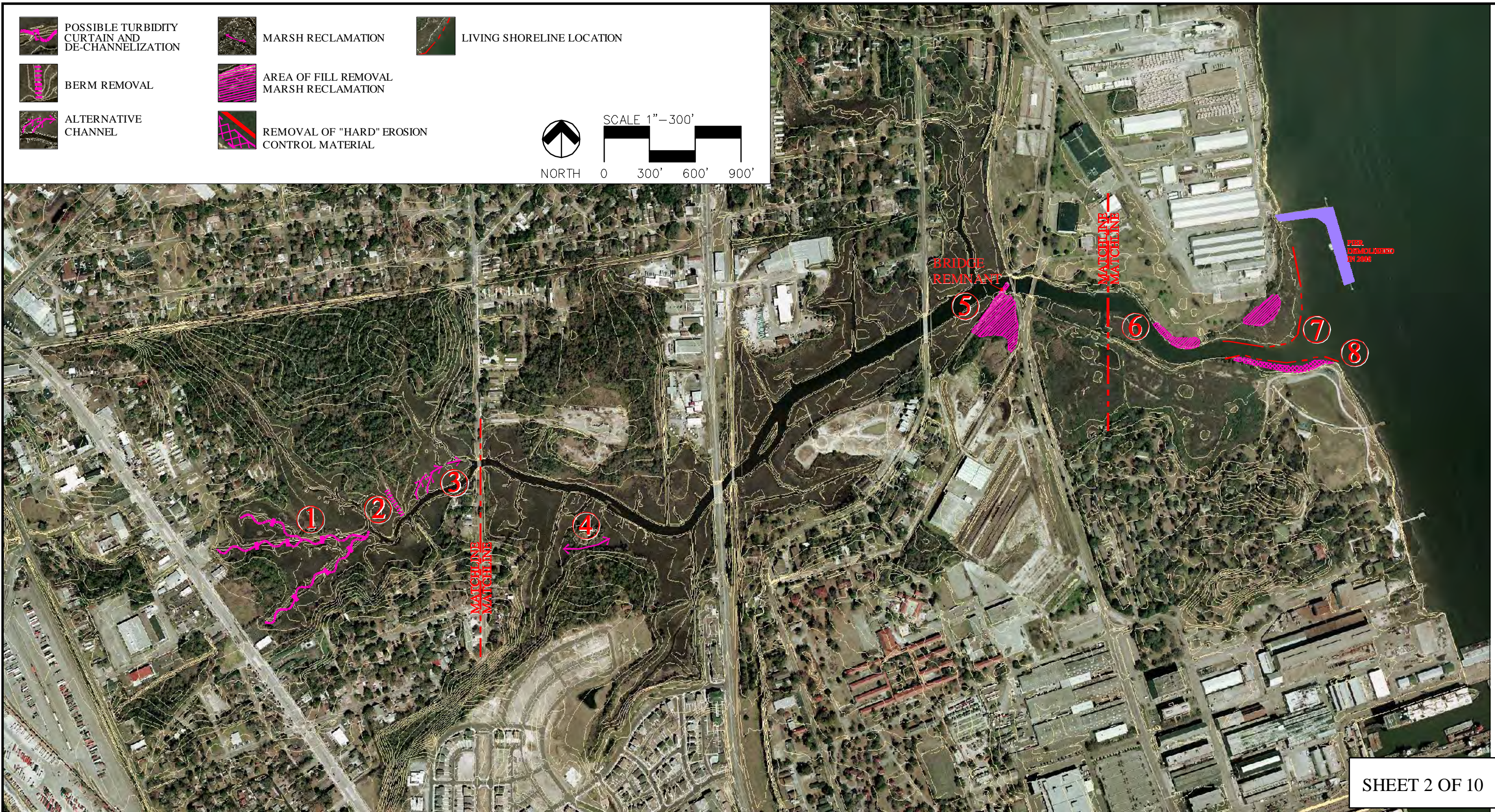
Boundary	(~ 473.17 ac.)	
Outparcels	(~6.02 ac.)	
Dike Removal (Bridge Span)		
Access Easement	(~4.22)	

**NOTES:**

1. This is not a survey.
2. Area calculations are approximate.
3. Aerial photograph from USGS high resolution orthoimagery dated 2012.







**RESTORING WETLANDS IN NOISETTE CREEK**

**RESTORATION AREA LOCATION EXHIBIT**  
CITY OF NORTH CHARLESTON, SOUTH CAROLINA





# Agency Coordination Meeting Notes – January 8, 2020

---

**Attendees:**

FHWA	Shane Belcher Jim Martin
NOAA-NMFS	Cynthia Cooksey
NPS	
USACE	Christopher Mims
USCG	Randall Overton
USEPA	Alya Singh-White
USFWS	Mark Caldwell
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM	Josh Hoke Chris Stout Blair Williams
SCDNR	Susan Davis
SCDOT	David Kelly Chad Long Will McGoldrick
SCPRT	
CDM Smith	Amy Livingston
HDR	Blair Wade
Three Oaks Engineering	Amanda Chandler Heather Robbins Geni Theriot

**Purpose of the Meeting:**

Public involvement update

**Public Involvement Overview:**

- Comment period extended to January 31, 2020
- Activity from November to present
  - 5 Community Meetings
  - Public Information Meeting
  - Virtual Public Information Meeting (VPIM)
  - Stakeholder Meeting
  - Media Day
- Received 291 comments as of January 2, 2020. Variety of sources for comments to be submitted (in-person, hotline, email, etc.)
  - 77 were visits to community office
  - 127 from website

- Top Comments
  - Right of Way (ROW) – Half of the comments have been received by people going to the community office
  - Displacements – fair treatment of those displaced, specific question, or if their property had the potential for impact
  - Multimodal/Regional transit – additional methods, better system, bus lanes, and addition of bike/ped access
  - Wetlands – Filbin Creek and flooding
  - Noise – Park Circle area
- Alternatives Comments
  - Maintain access to Rivers Ave
  - Truck traffic at N Rhett Ave
  - Support of No-build
- 16 positive comments about outreach (public or community meeting)
- Next step is to take a hard look at the comments and generate correct responses to continue public engagement in the project.
- Community Office
  - Located in Gas Lite Square in North Charleston
    - Within the project study area
    - Pedestrian and public transit friendly
  - Staffed with community liaisons
    - ROW specialists available every Wednesday
  - Appointments can be scheduled if the operating hours are inconvenient
- Comment summary will be shared once the comment period ends and prior to asking agency concurrence

#### **DEIS Review:**

- Which sections does each agency want to review?
  - A poll or spreadsheet will be sent to agencies for their input
- 2-week review built into schedule, but can request more time if needed
- Agencies will be sent a test pdf document using an FTP in an attempt to access it
  - Comments are acceptable in the pdf or by email

#### **Action Items:**

- February Agency Workshop Attendance poll - Completed
- DEIS Agency Review of Chapters/Sections poll - Completed
- Test FTP for agency use to review documents - Completed

#### **Upcoming Events:**

- Agency Workshop – February 12, 2020 (held at Project Office in Charleston)
- Agency Meeting – March 11, 2020 – Mitigation Update
- Agency Meeting – April 8, 2020 – DEIS Section Discussion
- Agency Meeting – May 13, 2020 – Proposed Preferred Alternative

# Agency Coordination Meeting Notes – February 12, 2020

---

FHWA	Shane Belcher Jeffrey Cantey Jim Martin
NOAA-NMFS	Cynthia Cooksey Brian Rosinger
NPS	
USACE	Christopher Mims
USCG	Randall Overton
USEPA	Alya Singh-White
USFWS	Mark Caldwell
SCDAH	
SCDHEC	
SCDHEC-OCRM	Josh Hoke Colleen McDonald Chris Stout
SCDNR	
SCDOT	David Kelly Chad Long Will McGoldrick Joy Riley
SCPRT	
CDM Smith	Amy Livingston
HDR	Blair Wade
Maximum Consulting	Mattese Lecque
Stantec	Rick Day Jim Fisher Jason Hambley Horrace Tobin
Three Oaks Engineering	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot

## Introductions

### Joy Riley presentation

- Overview of project limits
- Review of P & N
  - Most congested corridor on CHATS, #6 on SCDOT list, Top 20 most congested interstate segments (SCDOT 2014 Multimodal Transportation Plan)
- OFD project
- Project timeline and where we are
  - Tracking towards a preferred alternative in next few months

- Public Hearing Q4 2020

Looking at alternatives throughout the life of this project

- Interstate corridor analysis → planning level analysis
  - Completed in 2013, funding assigned in 2014
- Three different planning studies for this project
  - 2013 I-526 Corridor Study
  - 2019 I-26 Corridor Study
  - 2019 CHATS interstate Congestion Management Plan
    - One large document that shows analysis of all existing studies and analysis for interstates in CHATS boundary
    - i.e. mass transit, park and ride, managed lanes, etc.
- Analysis of traffic operations
  - Crash data, geometry review, existing traffic patterns, level of service, delays, etc.
    - Rank each problem with those that would benefit public the most if fixed
    - Look for low \$ solutions then long-term improvements

Travel Demand Management

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>● Bus Rapid Transit → Rail project in Charleston</li> <li>● Park and Ride</li> <li>● Telecommuting</li> </ul> | <ul style="list-style-type: none"> <li>● Bike Ped</li> <li>● Manage Lanes</li> <li>● Land Use Management (Out of SCDOTs control)</li> </ul> |
|--|---|

Funding has been applied to:

Carpools/ vanpools & park and rides  
 Telecommuting & Flex Work Times  
 Bus & Rapid Transit  
 Education & promotion of TA

Interim Low-Cost Improvements

- Ramp Alterations and minor improvements to intersections
- Signed improvements
- Clear zone improvements
- Access management
- Restriping bridges/existing road and advanced signaling
  - Ruled out due to safety and electrical infrastructure deficiencies
- Improved signage/ additional signage
- Pavement marking improvements
- Ramp metering

Which improvements result in greatest benefit?

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>● I-526/I-26 system interchange modifications</li> </ul> | <ul style="list-style-type: none"> <li>● I-526 Mainline capacity and operations</li> </ul> |
|---|--|

- Service interchange improvements LOS
- Bike and Pedestrian Improvements within corridor

To solve Purpose and Need, must incorporate multiple solutions –  
Widening alone or other standalone alts don't solve the problem

#### Preliminary Screening of Range of Alternatives

- No Build
- Improvements to local facilities
  - East Montague
  - Remount Rd
- New Facilities

#### Alternatives Evaluation

- Carry forward alts from 2013 Corridor Study
- Evaluate interchange mods at all service interchanges
- Study traffic operations of each interchange model- what moves forward?
- Compare traffic operations/acceptable LOS
- Compatibility with adjacent interchanges
- Eliminate large footprints with no improvement to LOS

#### 7 Alternatives Evaluated for System to System

- Some included improvements to Rivers Avenue
- Alternative 7 was preferred in corridor study

#### 4 were carried forward for detailed NEPA Analysis

What happened to other 3?

Cost, constructability, similarities to other alternatives, cost/benefit analysis  
Alternative 7 had large impact to airports and a very large footprint

#### Rivers Avenue Analysis → 4 alternatives in corridor study

- Currently works okay
- Other alternatives impact functionality and requires modification
- Could involve closure of access on Rivers
- Build over interchange and modify access
- Partial cloverleaf rebuilds carried forward
  - = "A" Alternatives in Reasonable Alts
- Basic Build = closes Rivers Avenue access and widens I-526 mainline

#### Paul Cantrell Boulevard and Magwood Drive → 7 Alternatives

- Alternative 5 carried forward
- Intersection creates delays on interstate
  - Ramps couldn't be made large enough to store traffic

#### Paul Cantrell Boulevard at I-526 → 5 Alternatives

- Alt 5 moved forward

#### N Rhett/ Virginia Avenue → 4-6 Alternatives reviewed

- Alternatives 1 & 2 carried forward

#### Mainline Alternatives

- 6 lane vs 8 lane

#### No Build

- LOS continues to fail and get worse
- Increased delays and travel time
- Increase in crashes
- Funding spent elsewhere on interstates and not here

\*526 West is funded by interstate funds, limits how many can be used

#### Reasonable Alternatives

- Meets purpose and need
- Eliminated large footprint with minimal improvements
- SCDOT goals and priorities
- Public & Agency input

#### Roadway Typical Alignments

- Widens over Ashley River on existing structures
- Build parallel on other elevated structures
  - Seismic “lifeline”
  - More value with similar impacts when compared to widening existing structures

#### Future Traffic Operations

- Active traffic management
- This may be the last time this corridor can be widened
  - Improve infrastructure now to account for future needs and improvements

#### System to System

- Alts 1&2 closes access to Rivers Avenue
- 1A and 2A rebuilds access to Rivers Avenue

#### N Rhett/ Virginia Avenue

- Alt 1&2 did not get positive feedback from Public New Alts at this interchange being developed as Alt 5&6
- Alt 5&6 are variations of Alt 1&2, modified to improve function with heavy truck traffic volumes on Virginia Avenue



- Don't want to create another problem while trying to fix existing

Paul Cantrell Boulevard

- Only one alternative

In the process of screening each reasonable alternative:

553 comments from the public

- Row Impacts
- Natural Impacts
- Bike/Pedestrian
- Improve transit
- Noise Impacts

Community Impacts

- ROW Impacts
  - 281-334 relocations anticipated
- Environmental Justice Impacts
  - 4 neighborhoods at system to system
  - 133-170 of 281-334 in this area
  - Approximately 75% with ROW impacts
  - Looking at ways to minimize/mitigate

Public Outreach

- Project office → workshops at project office
- Trying to repair wounds from past SCDOT projects
- Community Advisory Committee
- Community Driven Mitigation

No Build for USACE needs to include: No Federal Action

- Include information about Low Cost Improvements and any other work that has been funded or completed in lieu of widening and interchanges
- Alternative Technical Memo will include this information.

#### **Action Items**

- Public Involvement Comment Log to be sent to agencies
- Chapter 1 & 2 to be sent to agencies
- Updated PDF of workshop presentation provided with meeting summary
- Send agencies updated kmz files for reasonable alternatives

#### **Upcoming Events**

- Agency Meeting – March 11, 2020 – Mitigation Update
- Agency Meeting – April 8, 2020 – DEIS Section Discussion
- Agency Meeting – May 13, 2020 – Proposed Preferred Alternative



# Draft Meeting Summary

## I-526 LCC WEST Agency Coordination Meeting

SCDOT – 955 Park Street, Columbia, SC 29202

March 11, 2020 10:00AM

### Attendees

<b>FHWA</b>	Shane Belcher Jim Martin	<b>NOAA-NMFS</b>	Cynthia Cooksey Brian Rosinger
<b>NPS</b>		<b>USACE</b>	Christopher Mims
<b>USCG</b>	Randall Overton	<b>USEPA</b>	Alya Singh-White
<b>USFWS</b>	Mark Caldwell	<b>SCDAH</b>	
<b>SCDHEC</b>		<b>SCDHEC-OCRM</b>	Chris Stout
<b>SCDNR</b>	Susan Davis	<b>SCDOT</b>	Chris Beckham Sean Connolly David Kelly Chad Long Will McGoldrick Joy Riley
<b>SCPRT</b>	Justin Hancock	<b>HDR</b>	Blair Wade
<b>Three Oaks Engineering</b>	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot	<b>Wildlands</b>	Daniel Johnson

### Introductions

The purpose of this meeting is to provide an update and receive agency feedback on the mitigation needs assessment for the I-526 LCC West project.

### DEIS Updates

- Ch. 1&2 comments received
- Working on incorporating those

### NRTM

- SCDOT has reviewed, going to FHWA on 3/27

### Reasonable Alts Concurrence Point

- Coming out from FHWA later this week via email to each agency POC

### Mitigation Update

- Goal of this conversation is "Fire side chat about mitigation" per Sean Connolly
- Focus on tier 1,2,3 options
- Site visits have been conducted at Cedar Hill and Jehossee Farms
- Cedar Hill –
  - High quality resources
  - No current protective measures on the site
- Jehossee –
  - SCDOT would convert to PRM, should it move forward
  - Concerns with easement overlay, status (or support by TNC) is unknown.
    - Need more defined parameters of conservation easement
- 3 combinations being proposed at this point



March 11, 2020  
I-526 LCC WEST Agency Coordination Meeting  
Page 2 of 3

- Cedar Hill and Jehossee
- Cedar Hill and Noisette
- Cedar Hill and credit procurement
  - Credit procurement is not DOT's preferred alternative
- "Kings Grant site" still included as a contingency plan (aware of agency concerns with this site)
  - Not DOT's preferred alternative
- Cedar Hill seems good for FW mitigation needs, need feedback from agencies for tidal
- Looking for feedback on Noisette, Jehossee, Kings Grant
  - Pros & cons, red flags?

#### Noisette site:

- SCDNR – status of NOAA grant for Noisette?
  - DOTs understanding is the grant never funded or moved forward/implemented
  - NOAA believes the same
  - Noisette – mitigation would use NOAA's grant plan as a guide on this site
  - SCDNR – good site in correct watershed
- USFWS – what do the numbers on plan represent?
  - Site identifiers and work plans associated with each number
  - Specific to the plan → will be sent out after this meeting
  - Need to reach out to M Caldwell (USFWS) with map and descriptions of what each number represents in the Noisette figure
  - USFWS has concerns with adding sinuosity to Noisette
- Noisette site will require coordination with city of N. Chas and revisit proposed restoration plan
  - Will have to be updated and modified since it was developed about 10 years ago
    - Fill removal, living shoreline
- DHEC – OCRM mentioned development in the area (a lot of upland change as compared to aerial)
  - Sites 4,5,6,7 may be only options
  - HDR identified the need for additional due diligence related to defining activities
  - Ped bridge project by city of N. Chas is in the works

#### Cedar Hill site:

- Cedar Hill site is a "landscape" approach and would be approached as a ratio vs. credits
  - How does that look if paired with Noisette?
  - Cedar Hill is about 15/1 wetlands & 5/1 streams
  - 3600 acres
  - Property is owned by Johnson Development
- DNR worried that only wetlands and small buffer would be protected
- Proposed land uses by Johnson Development are solar farm and timber management
- DOTs preference is to go with Cedar Hill if possible
- DNR doesn't want to pursue Cedar Hill if the owner has intentions of "chopping it up" for development

#### Other properties:

- DNR concerns with "Berkeley County Timber Sites"
  - Would prefer bank credits to those sites

- Cedar Hill is top priority
- A new property was brought to DOTs attention
  - Hermine/Martin site
    - Had been proposed as SC 41 mitigation
  - About 53 credits USFS interested in long term management
  - \*\*\*USFWS opposed to preservation credits being generated
  - USFWS expressed concern with removal of entire berm to retain habitat
  - Shade Credit Determination: Less than 20ft is when shading impacts apply – higher bridges let in enough light
  - Need to evaluate shading impacts – would Hermine work for shading?
  - Hermine may offset fill
- Hermine site would not satisfy all credit needs
- Majority of impacts to tidal are shading about 2.5 acres fill
- What can be done for tidal if we go landscape?
  - DNR ok if credit generation is close to meeting needs
  - SCDNR noted concern with large scale out of kind and NOAA concurs
- If preservation not available for tidal, how else can needs be met?
  - Finite budget available
    - More tidal = less Cedar Hill
- Hermine site offsets dominant impact of fill
- SCORE project closer to project site as a component of the plan
  - Offset partial functional loss of shading
- Noisette is preferred by DNR, NOAA
- Hermine preferred by USFWS
- Combination of Noisette and Hermine?
  - Dykes breached at Hermine already
  - Noisette restoration – partial
- If we have to go credit for credit on tidal Cedar Hill is out
- USACE supports PRM due to proximity and lack of in-kind mitigation.
- USACE suggested that landscape may exceed in some areas and fall short in others.

### **Closing Discussion**

- Landscape, watershed approach of Cedar Hill
- Noisette restoration components and Hermine site seems reasonable to agencies
  - Need to nail down shading impacts and how those are being quantified (4.8-5 existing on Ashley River)
  - DOT to continue vetting sites Cedar Hill, Jehossee, Hermine, Noisette and others
    - Continued due diligence
      - Working with landowners at Cedar Hill
      - Jehossee Easement
      - Noisette Reach out to City of N. Charleston
      - Explore Hermine site in more detail
- 404 Pre-app in July
  - How to update agencies between now and then?
    - Updates during monthly meetings



# Draft Meeting Summary

## I-526 LCC WEST Agency Coordination Meeting

Adobe Connect

April 8, 2020 10:00AM

### Attendees

<b>FHWA</b>	Shane Belcher Jim Martin	<b>NOAA-NMFS</b>	Cynthia Cooksey
<b>NPS</b>	Alexis John	<b>USACE</b>	Christopher Mims
<b>USCG</b>	Randall Overton	<b>USEPA</b>	Alya Singh-White
<b>USFWS</b>	Mark Caldwell	<b>SCDAH</b>	Elizabeth Johnson
<b>SCDHEC</b>		<b>SCDHEC-OCRM</b>	Josh Hoke Chris Stout Blair Williams
<b>SCDNR</b>	Susan Davis Stacie Crowe	<b>SCDOT</b>	David Kelly Will McGoldrick Joy Riley
<b>SCPRT</b>	Justin Hancock	<b>HDR</b>	Blair Wade
<b>Three Oaks Engineering</b>	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot		

### Introductions

The purpose of this meeting is to provide agencies with an update on the DEIS and preliminary evaluation of floodplain mitigation.

### DEIS Update

- Need Recommended Preferred Alternative to finish Alternatives Development Tech Memo.
- Draft DEIS to SCDOT in August.

### Concurrence

- Agency review time extended due to current circumstances.
- Agencies that have not submitted concurrence as of April 8, 2020
  - SCDHEC
  - SCDHEC-OCRM
  - SCPRT

### Floodplain Mitigation

- SCDOT is in preliminary stages of evaluating areas for floodplain mitigation.
  - Evaluating land surrounding Filbin Creek from Railroad Avenue to Attaway Street and portion of land west of Attaway Street.
- Rivers Avenue bridge crossing Filbin Creek needs to be replaced.
  - Goal is to replace bridge and reduce flooding upstream and downstream.
- Area is located within a FEMA designated special flood hazard area.
- Area being evaluated extends the study area.
- Field work is being conducted to quantify potential impacts.
- Asking for input from agencies.



April 8, 2020  
I-526 LCC WEST Agency Coordination Meeting  
Page 2 of 2

- Agency Comments:
  - Significant concerns with excavating wetlands for stormwater retention.
  - Would like to see more innovative solutions other than solving drainage issues by excavating wetlands.
  - area is EFH adjacent and there is concern that excavation could impact EFH downstream.
  - Concern with natural attributes of area.
  - Concern with surrounding EJ neighborhoods and impacts.
  - Water of the U.S. and cannot be used for water quality treatment.
- SCDOT intent is not to create a pond but flood control storage.
  - Need to grade down 3-4 feet and could let area revegetate – not yet to that part of analysis.
  - Still trying to find the balance to reduce flooding and minimize impacts while replacing the bridge.
- Alterations to bridge at Rivers Avenue would allow for more water downstream and area surrounding Attaway Street would have the most impacts.
  - Bridge will not meet current hydraulic standards without creating some sort of flood control.
- City of North Charleston desires to improve aesthetics and public access in areas around Filbin Creek.
  - SCDOT desires to maintain natural storage for large storm events and reduce flooding downstream
- The Rivers Avenue bridge replacement does not have to happen with the I-526 LCC WEST project but will have to be replaced before BRT and could become emergency project.
  - Very complicated with flooding and utilities.
  - Considered retention area at mobile home park but this would not address flooding between the railroad and Attaway Street.





## Meeting Summary

### I-526 LCC WEST Agency Coordination Meeting

Adobe Connect

May 13, 2020 9:00AM

#### Attendees

<b>FHWA</b>	Shane Belcher Jim Martin	<b>NOAA-NMFS</b>	Cynthia Cooksey Andrew Herndon
<b>NPS</b>	Alexis John	<b>USACE</b>	Christopher Mims
<b>USCG</b>	Randall Overton	<b>USEPA</b>	Kelly Laycock Alya Singh-White
<b>USFWS</b>		<b>SCDAH</b>	
<b>SCDHEC</b>	Chuck Hightower	<b>SCDHEC-OCRM</b>	Josh Hoke Chris Stout Blair Williams
<b>SCDNR</b>	Susan Davis	<b>SCDOT</b>	Sean Connolly David Kelly Chad Long Will McGoldrick Joy Riley
<b>SCPRT</b>	Justin Hancock	<b>HDR</b>	Blair Wade
<b>Three Oaks Engineering</b>	Amanda Chandler Heather Robbins Geni Theriot	<b>Stantec</b>	Rick Day Jason Hambley Josh Mitchell
<b>Wildlands</b>	Daniel Johnson		

#### Introductions

The purpose of this meeting is to provide agencies with an opportunity to view and comment on the Recommended Preferred Alternative.

#### Concurrence

- Recommended Preferred Alternative
  - FHWA will send concurrence request the first week of June with a mid-June response time

#### Alternatives PowerPoint

- Presentation given by SCDOT; pdf version attached for reference. Recommended Preferred Alternative includes the following components:
  - Paul Cantrell Blvd to International Boulevard and includes intersection at Magwood Drive
  - International Boulevard to Rivers Avenue, includes I-526 at I-26 system-to-system interchange – Alternative 2 was selected because it eliminates weaving movements and performs better
  - Rivers Avenue to N Rhett/Virginia Ave – Alternative 2A is a combination of Alternative 2 and 6, maintains access to/from Virginia Ave to I-526

#### Discussion/Questions

- Are impacts just fill or everything?
  - Impacts in matrix include all potential impacts, not just fill

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May 13, 2020  
I-526 LCC WEST Agency Coordination Meeting  
Page 2 of 2

- Does not seem like LOS is greatly improved
  - Some LOS F are very bad, it is a huge improvement from LOS F to D
  - Widening also allows for ability to integrate new technology and congestion management practices in the future
- Presenting Recommended Preferred Alternative to agencies to allow time for review
  - Want to address "red flags" now to avoid issues being brought up at the concurrence request
- USACE cannot concur on a Recommended Preferred Alternative until after the Public Notice
  - Can send a letter of no objection
- OCRM has definition of feasibility that needs to be met, need adequate documentation
- Congestion Management Plan
  - Draft is currently being reviewed by CHATS
  - Available for public review Summer 2020
  - Plan communicates vision and how current projects facilitate plans and management

**Next Meeting June 10, 2020 at 10:00 AM via TEAMS, Outlook invite sent**



**WEST** **526**  
**LOWCOUNTRY**  
**CORRIDOR**

*I-526 Lowcountry Corridor  
Project Update*

**May 13, 2020**



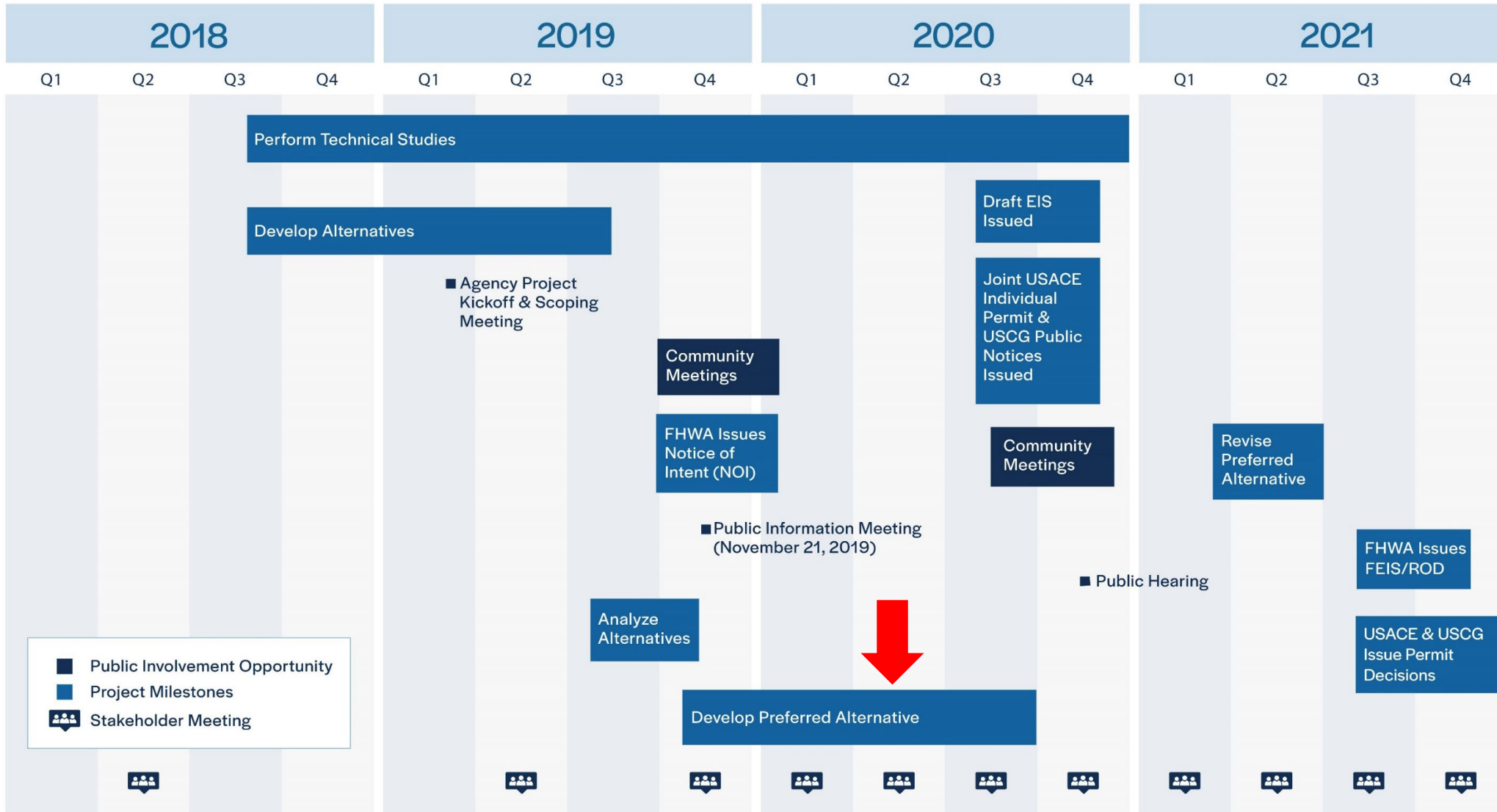
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U.S. Department of Transportation  
Federal Highway Administration



# Project Schedule *One Federal Decision*



- Public Involvement Opportunity
- Project Milestones
- Stakeholder Meeting

# Preliminary Screening of the Range of Alternatives

Identify Preliminary Alternatives

Screening of Preliminary Alternatives

Identify Proposed  
Reasonable Alternatives

Detailed Impact Evaluation of  
Proposed Reasonable Alternatives

Recommended  
Preferred Alternative







# Proposed Reasonable Alternatives



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# Proposed Reasonable Alternatives

- No-Build
- Existing Corridor Improvements Mainline Interstate Alternatives 8-lane widening
- Interchange Alternatives
  - 1 at I-526/Paul Cantrell Boulevard
  - 4 at I-526/I-26 and Rivers Avenue
    - Alt 1
    - Alt 1A
    - Alt 2
    - Alt 2A
  - 5 at I-526 N Rhett/Virginia Avenue
    - Alt 1
    - Alt 2
    - Alt 2A (newly developed)
    - Alt 5
    - Alt 6

# Reasonable Alternative Evaluation Criteria

- Purpose & Need
  - Geometric Deficiencies Resolved
  - Provides Direct Access to/from I-526
  - Provides Direct Access to/from I-26
  - Weighted v/c Ratio
  - Intersection LOS Delay
- Wetlands
  - Freshwater Wetland & Stream
  - Critical Area
  - Pond
- Relocations
- Environmental Justice
- Threatened & Endangered Species
- Essential Fish Habitat
- Cultural Resources
- Utilities
- Cost
- Section 4(f) & 6(f)

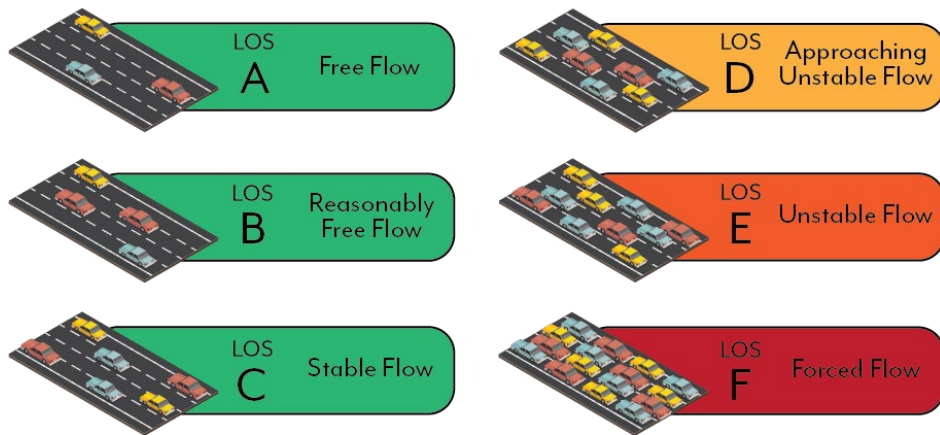
# Reasonable Alternative Evaluation Criteria

- Purpose & Need

- Weighted v/c Ratio

- Weights each individual v/c ratio according to the volume processed in that movement
    - A way to measure the efficiency of the alternatives for moving traffic within the interchange

- Intersection LOS/Delay



Segment Description	2015 AADT	No Build 2050 AADT	LOS	Build 2050 AADT	LOS	
					6-Lane	8-Lane
Sam Rittenberg to Paul Cantrell Blvd	39,400	59,800	C	68,500	B	B
Paul Cantrell Blvd to Leeds Ave	79,200	106,900	F	136,900	F	D
Leeds Ave to Dorchester Rd	78,800	106,400	F	134,000	F	D
Dorchester Rd to Montague Ave	80,700	108,900	F	127,300	E	C
Montague Ave to International Blvd	67,400	91,000	F	109,600	D	C
International Blvd to I-26	89,000	120,200	F	126,700	E	C
I-26 to Rivers Ave	77,200	104,200	F	116,100	D	C
Rivers Ave to N Rhett Ave	75,600	104,400	F	126,700	E	C
N Rhett Ave to Virginia Ave	80,500	122,200	F	148,400	F	D
East of Virginia Ave	68,900	110,100	F	133,800	F	D



-  Paul Cantrell Blvd to International Blvd
-  I-526 at I-26 including Rivers Ave
-  I-526 at N Rhett/Virginia Ave



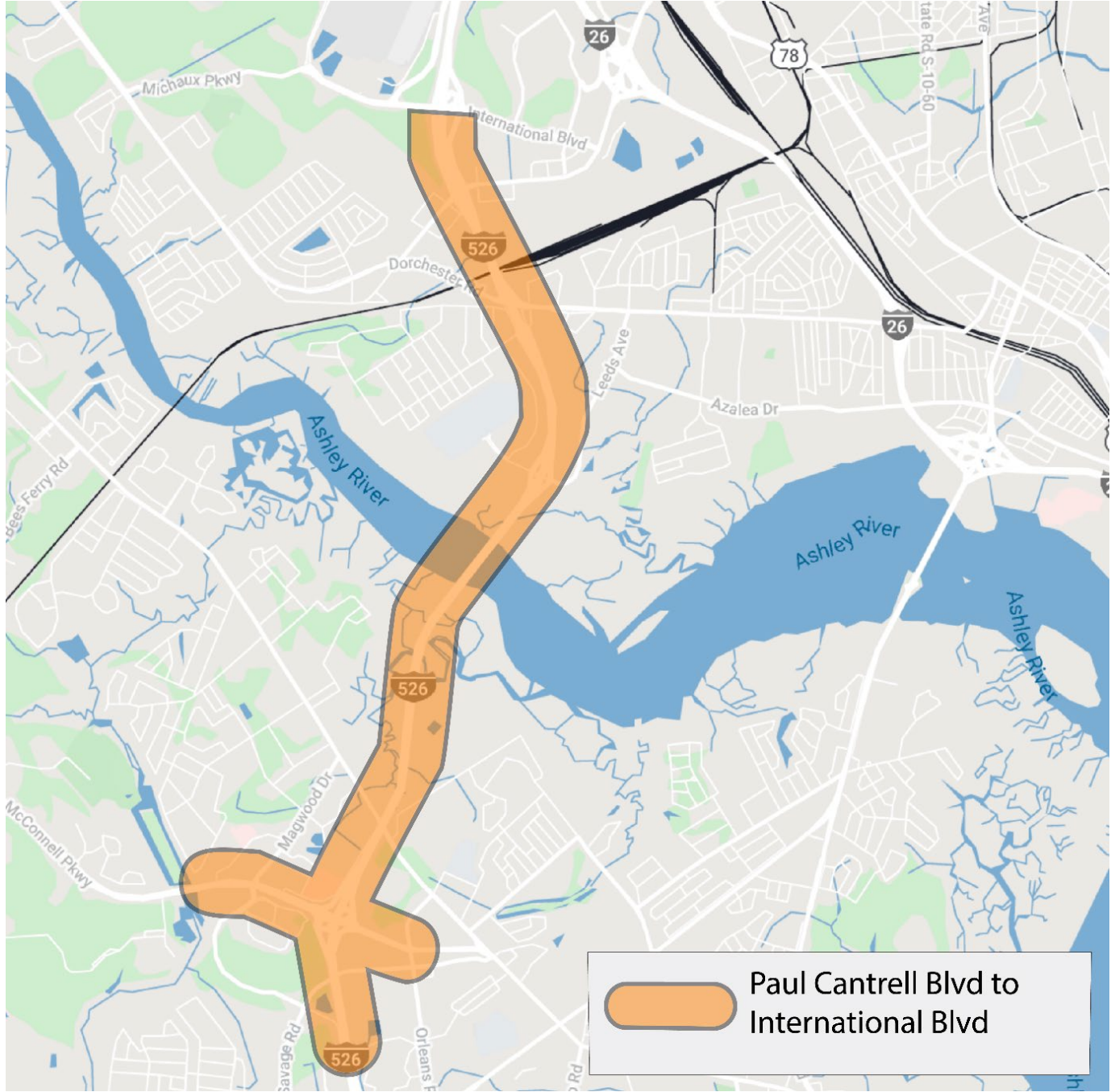


# Paul Cantrell Blvd to International Blvd



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# Paul Cantrell Blvd to International Blvd Alternative Analysis Matrix

	No-Build	Paul Cantrell Blvd to International Blvd
Weighted v/c Ratio	1.74   2.50   2.90   3.11	0.72   0.75   0.72   0.67
Mainline LOS	F	D/D/C/C
Wetland Impacts (acres)	0	19.3
Stream Impacts (feet)	0	327.0
Critical Area (acres)	0	15.5
Relocations	0	18
EJ Impacts	0	0
Cultural Resources	No	No
Section 4f/6f impacts	No	No
Utility Costs	\$0	\$12.9 M
Construction Costs	\$0	\$108 M



# I-526 at I-26 Including Rivers Avenue

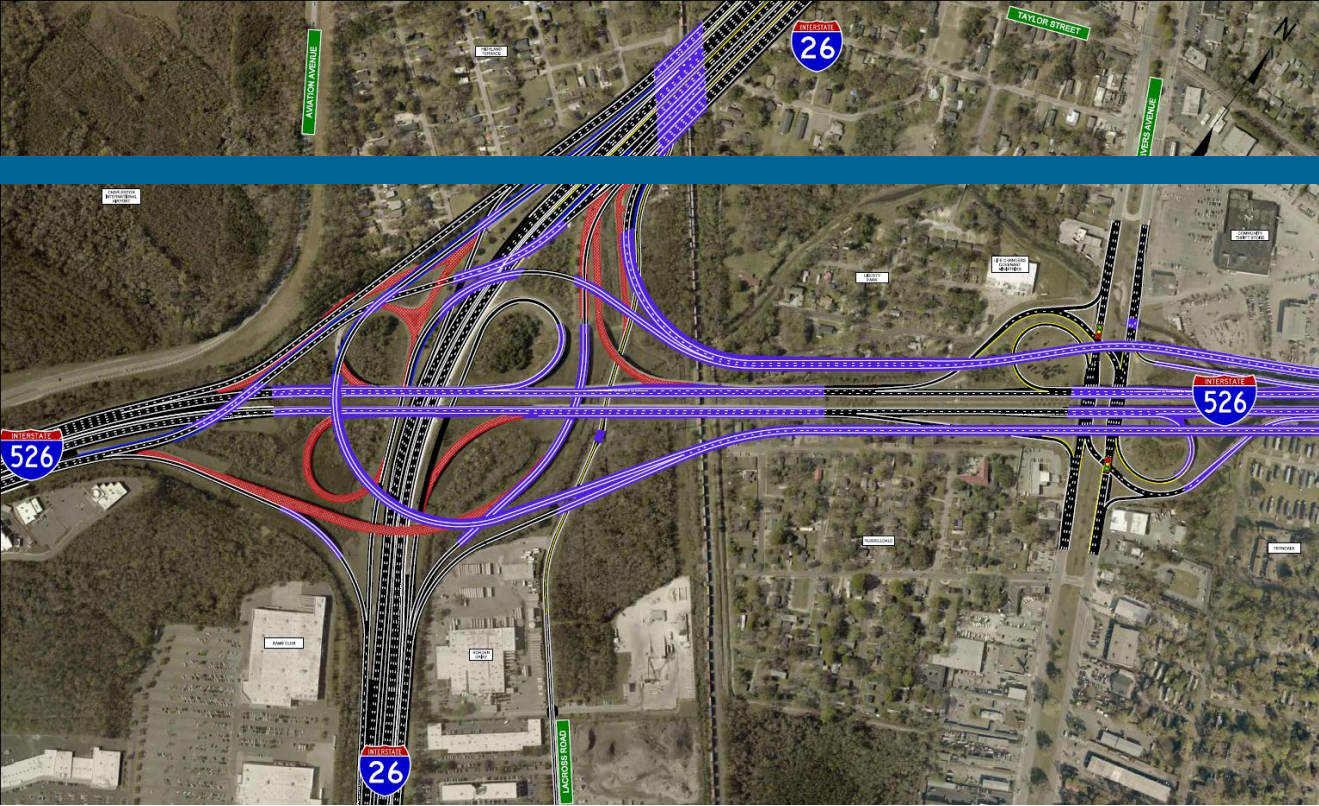


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# I-526 / I-26 Interchange



## Alternative 1

### Semi-Directional Interchange with Advance EB I-526 to WB I-26 Flyover Ramp

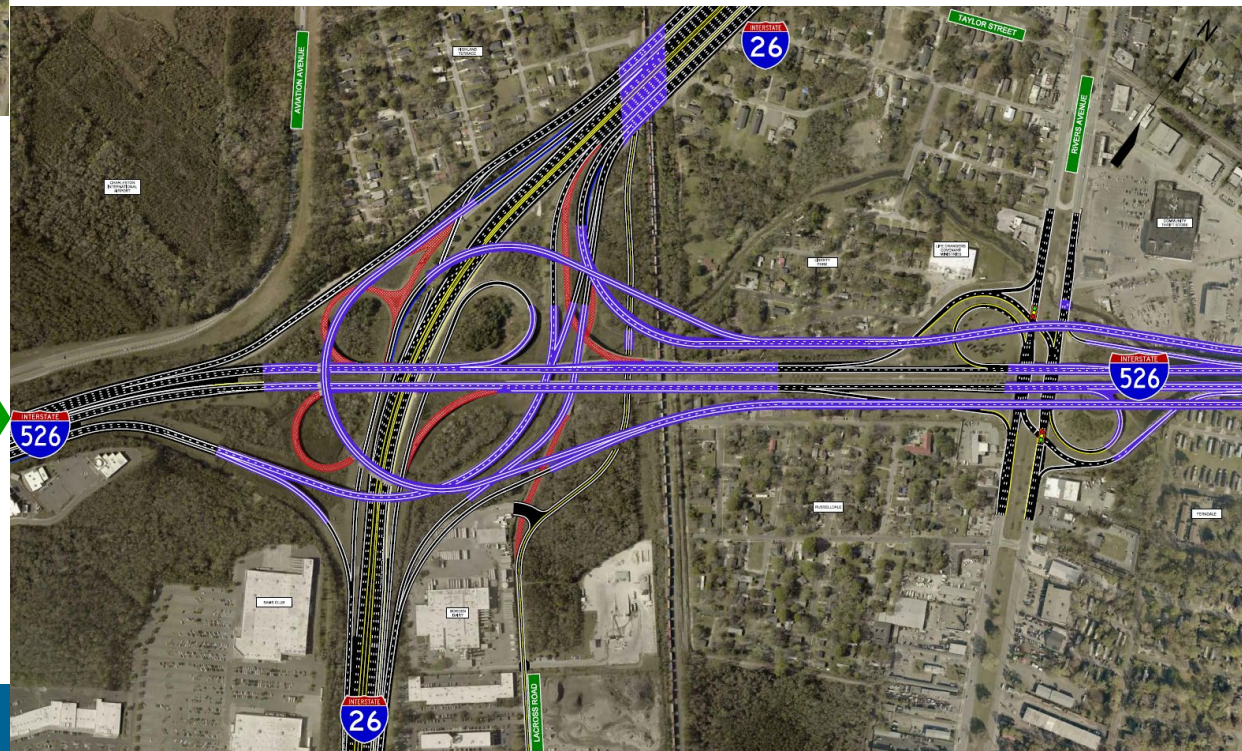
- New CD system over Rivers Avenue
- Access maintained to existing lanes I-526
- Access between Rivers and I-26 via I-526 removed



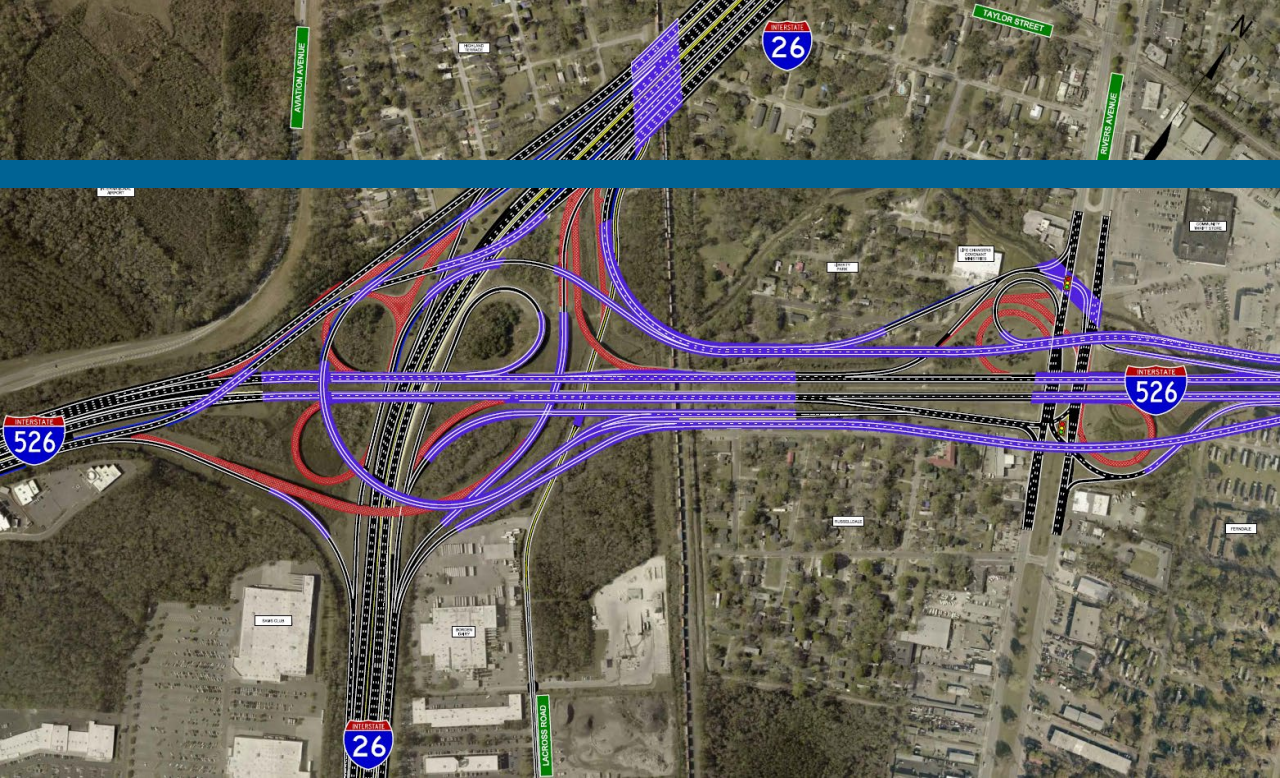
## Alternative 2

### Semi-Directional Interchange

- Similar to Alternative 1
- Utilizes existing directional ramp for EB I-526 to WB I-26

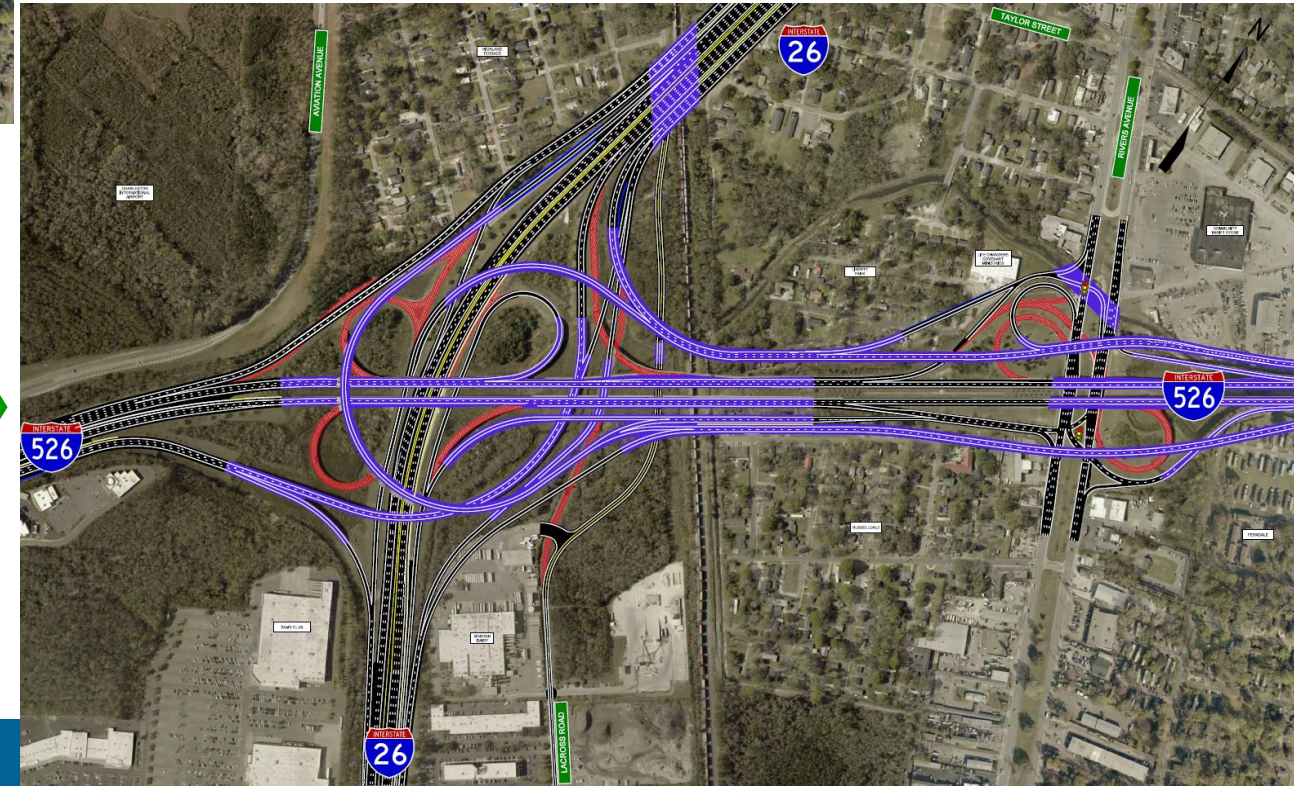






### Alternative 1A Semi-Directional Interchange with Advance EB I-526 to WB I-26 Flyover Ramp

- Similar to Alternative 1 with the same I-26 interchange
- Alterations at River Ave Interchange to add ramps to allow access to I-26 from Rivers Avenue via I-526



### Alternative 2A Semi-Directional Interchange

- Similar to Alternative 2 with the same interchange design at the I-526 and I-26 Interchange
- Alterations at Rivers Avenue interchange to add ramps to allow access to I-26 from Rivers via I-526



# I-526 at I-26 including Rivers Avenue Alternatives Analysis Matrix

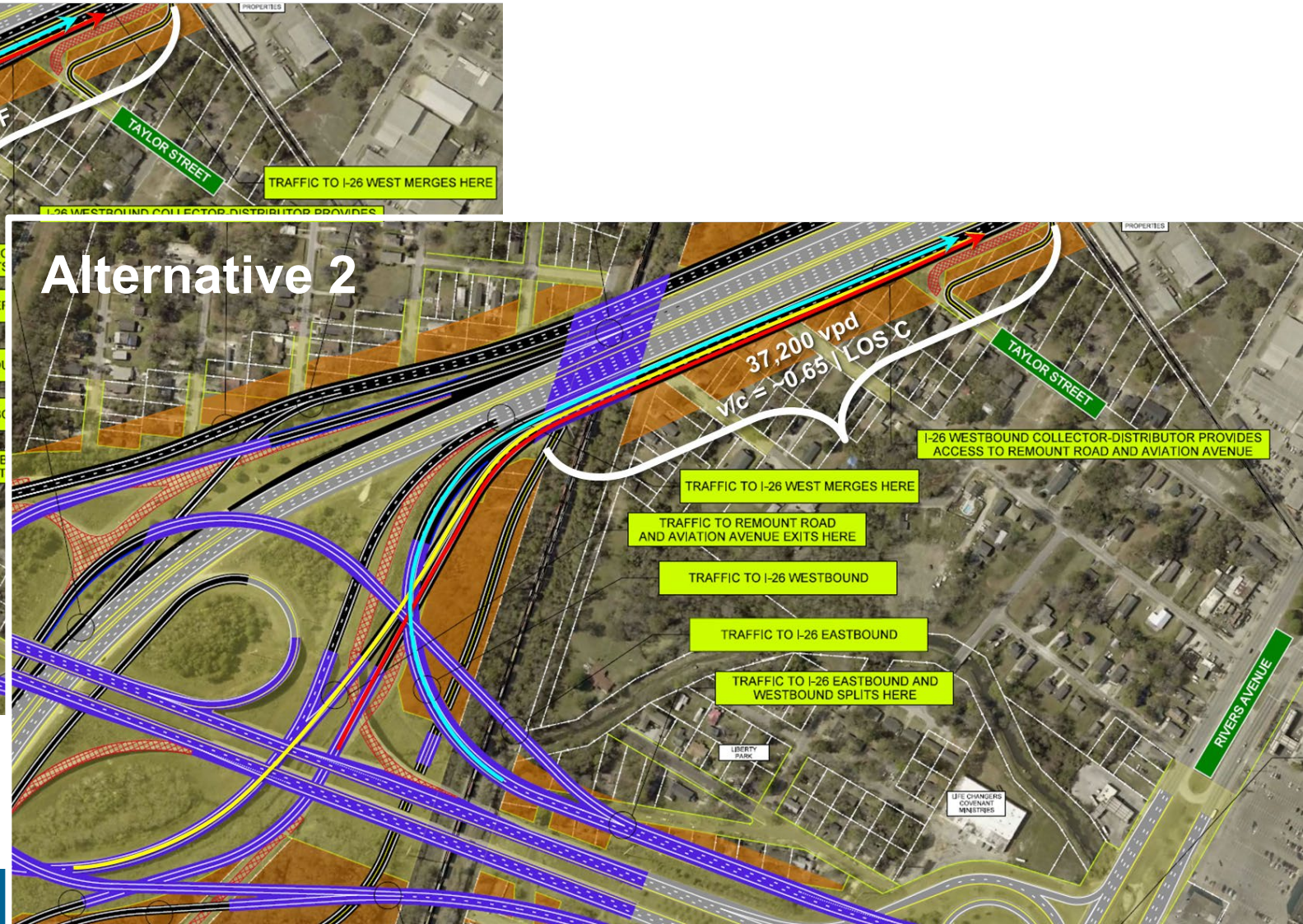
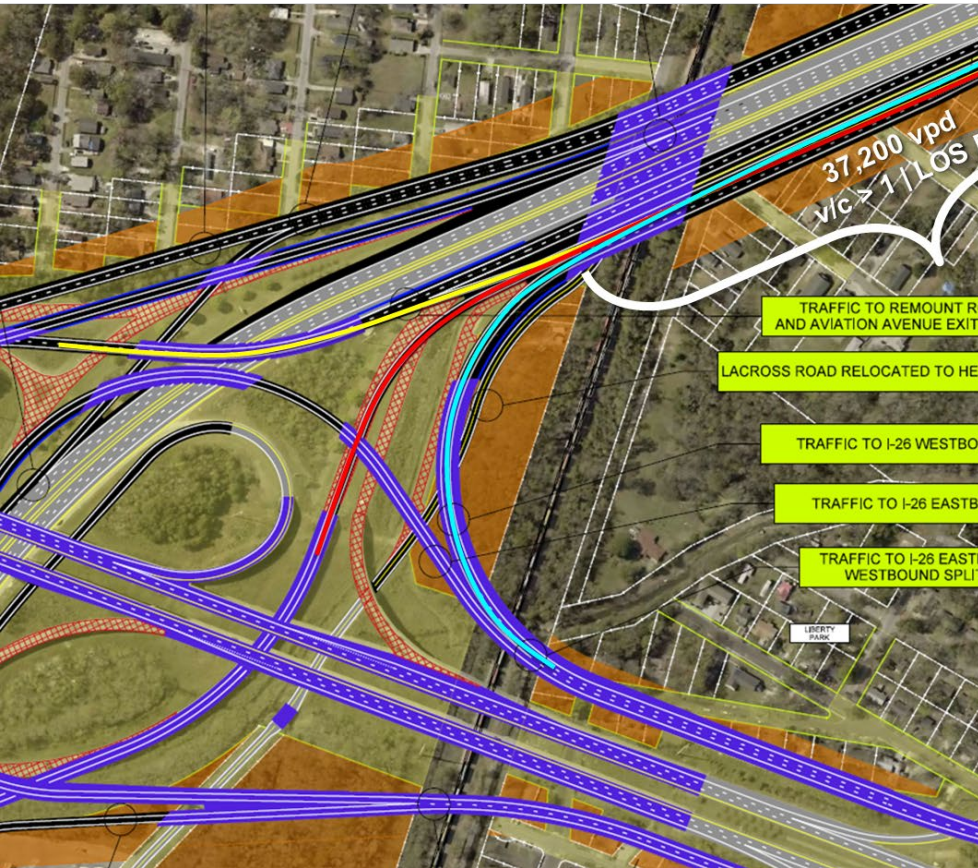
I-526 at I-26 including Rivers Ave:	No-Build	Alternative 1	Alternative 2	Alternative 1A	Alternative 2A
Weighted v/c Ratio	1.09	0.74	0.71	0.77	0.74
Mainline LOS	F	C	C	C	C
Wetland Impacts (acres)	0	28.5	28.5	28.5	28.5
Stream Impacts (feet)	0	13,327.1	13,327.1	13,327.1	13,327.1
Critical Area (acres)	0	0	0	0	0
Relocations	0	106	106	132	132
EJ Impacts	0	94	94	120	120
Cultural Resources	No	No	No	No	No
Section 4f/6f impacts	No	Yes	Yes	Yes	Yes
Utility Costs	\$0	\$31 M	\$31 M	\$31 M	\$31 M
Construction Costs	\$0	\$950 M	\$979 M	\$1068 M	\$1066 M



**yellow** - All traffic from I-526 EB

**red** - traffic from I-26 WB entering this section is destined for either Remount or Aviation and therefore desires the outer-most lane(s)

**teal** - The majority of traffic from I-526 WB desires to continue on the C-D towards I-26 WB past Remount and Aviation and therefore desires the inner-most lane(s)







# I-526 at N Rhett / Virginia Avenue



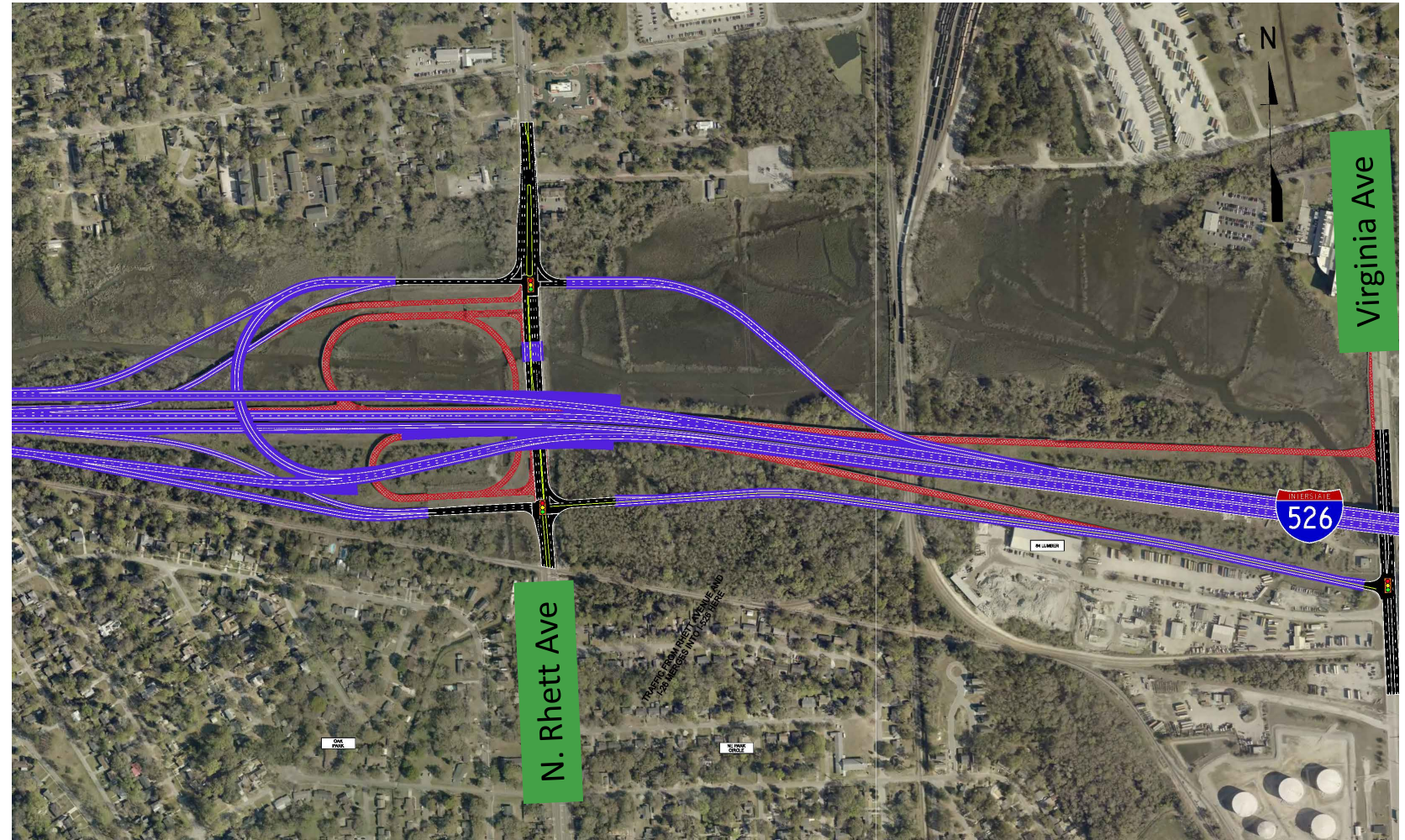
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# N Rhett Avenue Reasonable Alternative 1

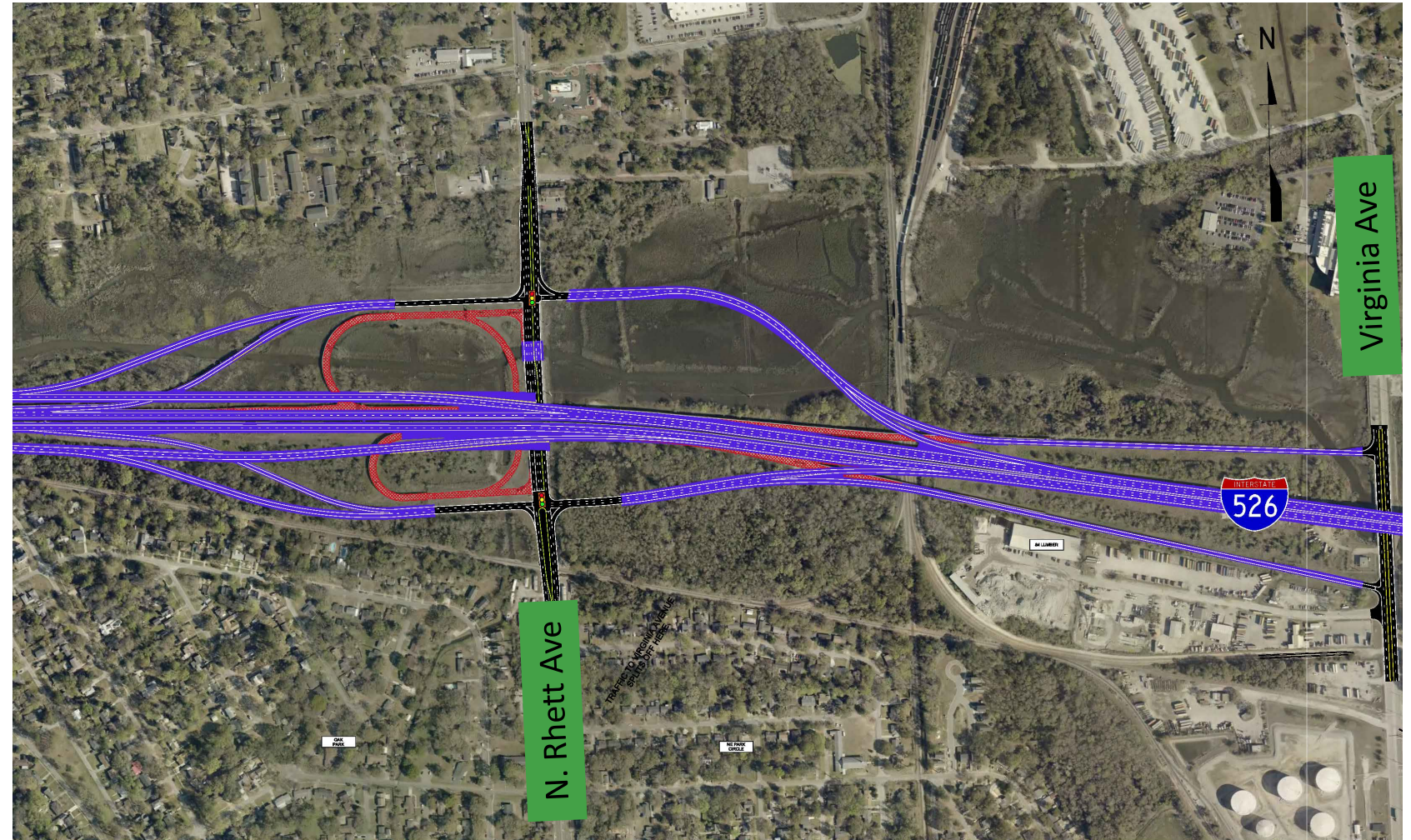
- Provides access from one intersection on N. Rhett Ave to Eastbound & Westbound I-526
- Provides separate, 2-way frontage road between N Rhett & Virginia Avenues
- Exit ramps from Eastbound & Westbound I-526 terminate at intersections on the south & north sides





# N Rhett Avenue Reasonable Alternative 2

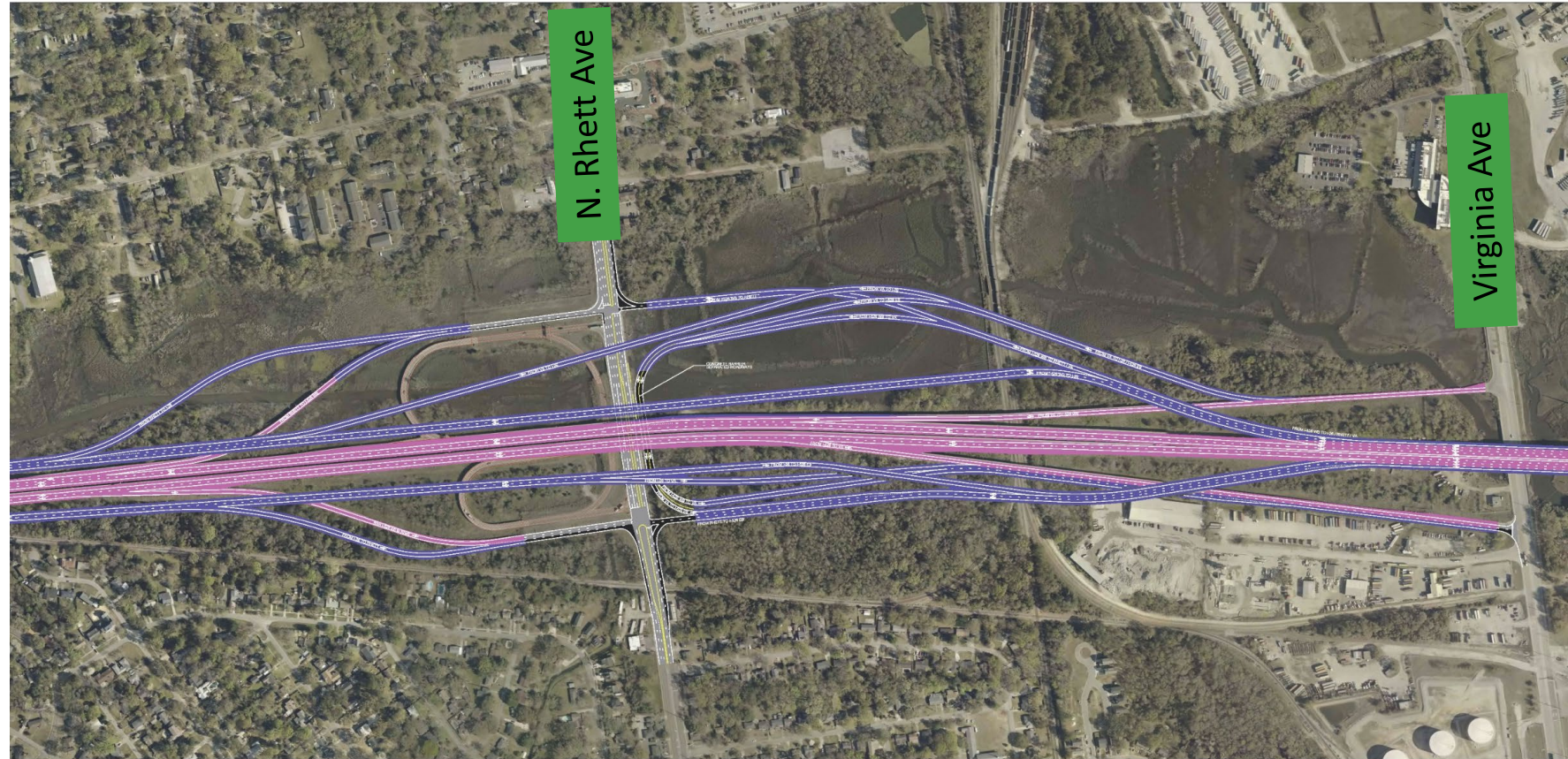
- Entrance ramps begin at **separate intersections** for Eastbound & Westbound I-526
- Provides separate, **1-way** frontage roads on either side of I-526 connecting N Rhett Ave to Virginia Ave
- Exit ramps from Eastbound & Westbound I-526 terminate at intersections on the south and north sides of I-526





# N Rhett Avenue Reasonable Alternative 5

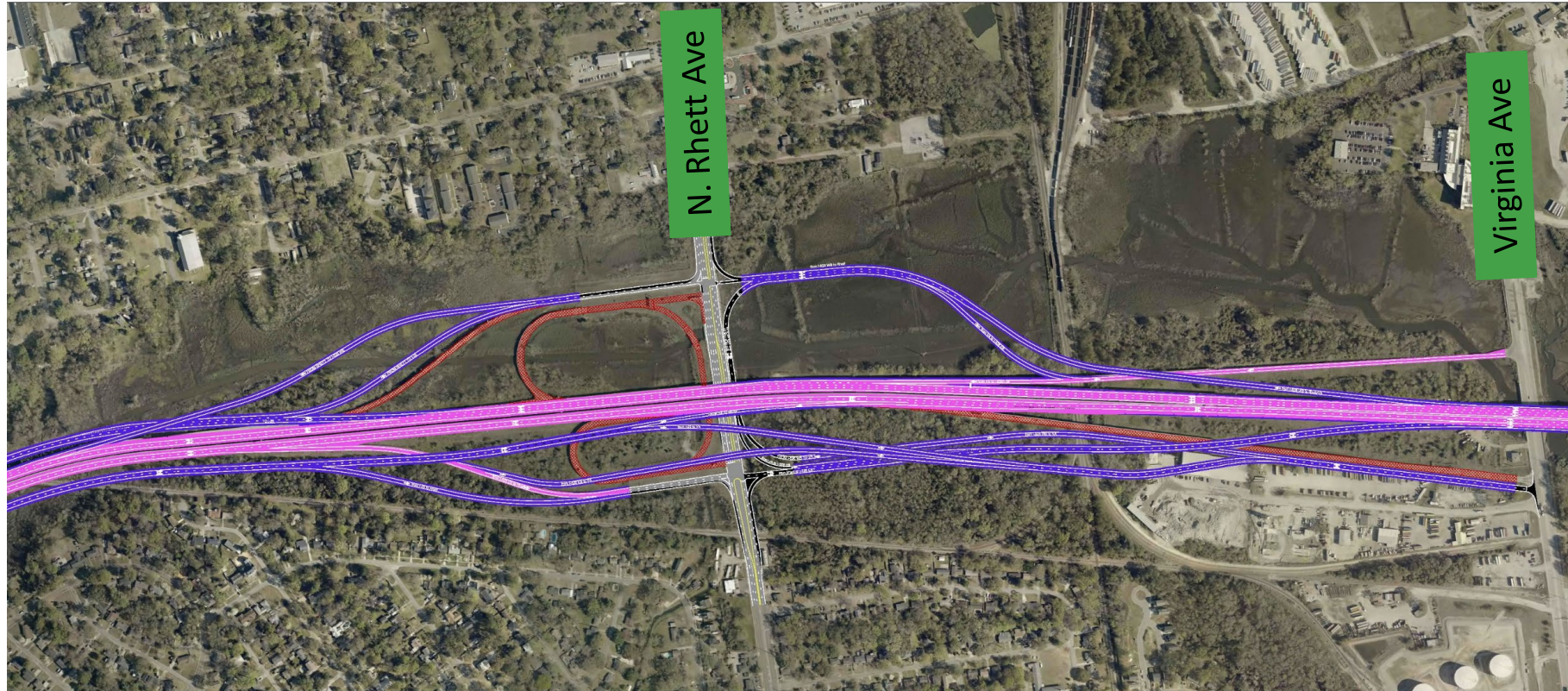
- Direct access ramps provided from/to I-526 and I-26 provided to/from N Rhett Ave and Virginia Ave
- Merge from I-26 EB C-D and diverge to I-26 WB C-D both occur just west of Virginia Ave
- Traffic from Virginia Ave to I-526 EB and from I-526 WB to Virginia Ave do not mix on U-turn under I-526





# N Rhett Avenue Reasonable Alternative 6

- Direct access ramps provided from/to I-526 and I-26 provided to/from N Rhett Avenue and Virginia Avenue
- Merge from I-26 EB C-D and diverge to I-26 WB C-D both occur just west of N Rhett Avenue
- Traffic from Virginia Avenue to I-526 EB and from I-526 WB to Virginia Avenue weave through U-turn under I-526





# N Rhett Avenue Reasonable Alternative 2A

*ADDITIONAL Reasonable Alternative*



- Restores direct access from Virginia to I-526 WB
- Streamlines access from Virginia to I-526 EB by adding Texas U-turn
- Vehicles travelling I-526 EB & WB go through N Rhett Intersection to access Virginia Ave

# N Rhett / Virginia Alternatives Analysis Matrix

N Rhett/Virginia Interchange:	No-Build	Alternative 1	Alternative 2	Alternative 5	Alternative 6	Alternative 2A
Weighted v/c Ratio	1.14	1.00	0.99	0.86	0.91	0.91
Mainline LOS	F	C/D	C/D	C/D	C/D	C/D
Wetland Impacts (ac)	0	54.5	51.3	57.3	50.8	49.9
Stream Impacts (ft)	0	5,159.6	5,169.1	5,197.4	5,205.9	4,977.6
Critical Area Impact (ac)	0	2.3	2.3	2.8	2.7	2.4
Relocations	0	4	4	4	4	1
EJ Impacts	0	1	1	1	1	1
Cultural Resources	No	No	No	No	No	No
Section 4f/6f Impact	No	No	No	No	No	No
Utility Impacts	\$0	\$4.5 M	\$4.5 M	\$5.6 M	\$5.6 M	\$5.6 M
Construction Costs	\$0	\$336 M	\$338 M	\$473 M	\$461 M	\$341 M





# Recommended Preferred Alternative



CONFIDENTIAL DRAFT



	No-Build	Paul Cantrell Blvd to International Blvd	I-526 at I-26 including Rivers Ave : Alt 2	I-526 at N Rhett/Virginia Ave : Alt 2A
Weighted v/c Ratio	> 1.00	0.72   0.75   0.72   0.67	0.71	0.91
Mainline LOS	F	D/D/C/C	C	C/D
Wetland Impacts (ac)	0	19.3	28.5	49.9
Stream Impacts (ft)	0	327.0	13,327.1	4,977.6
Critical Area Impact (ac)	0	15.5	0	2.4
Relocations	0	18	106	1
EJ Impacts	0	0	94	1
Cultural Resources	0	0	0	0
Section 4f/6f Impact	No	No	Yes	No
Utility Impacts	\$0	\$12.9 M	\$31 M	\$5.6 M
Construction Costs	\$0	\$108 M	\$979 M	\$341 M

	No-Build	Preferred Alternative
Weighted v/c Ratio	> 1.00	< 1.00
Mainline LOS	F	D/D/C/C/C/C/D
Wetland Impacts (acres)	0	97.7
Stream Impacts (feet)	0	18,631.7
Critical Area Impact (acres)	0	17.9
Relocations	0	125
EJ Impacts	0	95
Cultural Resources	0	0
Section 4f/6f Impact	No	Yes
Utility Impacts	\$0	\$49.5 M
Construction Costs	\$0	\$1,428 M





# Meeting Summary

## I-526 LCC WEST Agency Coordination Meeting

Microsoft Teams

June 10, 2020 10:00AM

### Attendees

<b>FHWA</b>	Shane Belcher	<b>NOAA-NMFS</b>	Cindy Cooksey Andrew Herndon Brian Rossegger
<b>NPS</b>	Alexis John	<b>USACE</b>	Christopher Mims
<b>USCG</b>		<b>USEPA</b>	Kelly Laycock
<b>USFWS</b>	Mark Caldwell	<b>SCDAH</b>	Elizabeth Johnson
<b>SCDHEC</b>	Chuck Hightower Logan Ress	<b>SCDHEC-OCRM</b>	Josh Hoke Chris Stout
<b>SCDNR</b>	Susan Davis	<b>SCDOT</b>	Chris Beckham Sean Connolly David Kelly Chad Long Will McGoldrick
<b>SCPRT</b>	Debbie Jordan	<b>HDR</b>	Blair Wade
<b>Three Oaks Engineering</b>	Amanda Chandler Russell Chandler Heather Robbins	<b>Stantec</b>	Rick Day
<b>Wildlands</b>	Daniel Johnson		

### Introductions

The purpose of this meeting is to provide agencies with an update on the project mitigation strategy

### Concurrence

- Recommended Preferred Alternative
  - Letters have been sent by FHWA and have received some agency responses
  - Would like to have all responses by June 18, 2020

### Mitigation Update

- Change in approach
  - No longer seeking landscape approach
    - Tidal creek/marsh mitigation sites did not provide efficient use of resources
    - Aggressive schedule to purchase site was not feasible
    - Legal concerns with Jehossee site
  - Will send out solicitation for bank credits
    - Goal is to not deplete credits in watershed
    - More credits becoming available soon
  - Construction schedule shift now allows for more time to secure bank credits in watershed
  - Bid going out in July for freshwater wetland, stream, and tidal credits
    - May be three separate solicitations



June 10, 2020  
I-526 LCC WEST Agency Coordination Meeting  
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### **Discussion/Questions**

- Table shown is worst case scenario, numbers will be updated as move through the permit drawing process
  - USACE suggests filling out mitigation worksheets that can be reviewed by the Corps to ensure calculations and feature types are correct
- Not all tidal areas are critical area but need to be accounted for
  - USACE and OCRM have different criteria when evaluating tidal jurisdiction
  - Suggest sorting by wetland types
    - NOAA - Magnuson-Stevens is in line with this approach
  - DNR recommends brackish areas be mitigated as tidal
    - Bridged areas would require less credits versus fill
      - Height to width ratio needs to be confirmed for shading impacts
- Temporary impacts from construction will need to be considered and mitigated

**Next Meeting July 8, 2020 at 10:00 AM via TEAMS, Outlook invite sent.**

**Pre-app meeting with USACE, USCG, DHEC 401, and OCRM CZC in July**

**Agencies will have chance to review the draft DEIS in August**



# Meeting Summary

## I-526 LCC WEST Agency Coordination Meeting

Microsoft Teams

August 12, 2020 10:00AM

### Attendees

<b>FHWA</b>	Shane Belcher Jim Martin Sandra Saint-Surin	<b>NOAA-NMFS</b>	Cindy Cooksey
<b>NPS</b>	Alexis John	<b>USACE</b>	Richard Darden
<b>USCG</b>	Randall Overton	<b>USEPA</b>	Alya Singh-White
<b>USFWS</b>	Mark Caldwell	<b>SCDAH</b>	
<b>SCDHEC</b>	Logan Ress	<b>SCDHEC-OCRM</b>	Josh Hoke Chris Stout
<b>SCDNR</b>	Susan Davis	<b>SCDOT</b>	Sean Connolly David Kelly Chad Long Will McGoldrick
<b>SCPRT</b>			
<b>Three Oaks Engineering</b>	Amanda Chandler Geni Theriot Heather Robbins	<b>Stantec</b>	Amy Sackeroff LaTonya Derrick Hannah Clements

### Introductions

The purpose of this meeting is to provide agencies with an update on the project concurrence points, milestone dates, Draft Environmental Impact Statement (DEIS), and to provide an overview of Section 6(f).

### Concurrence Points and Milestone Dates

- FHWA summarized the concurrence points and upcoming milestone dates as shown on the Agency Milestone Table and the Permitting Timetable.

### DEIS Update

- FHWA/SCDOT have reviewed the DEIS and provided comments. A revised DEIS is due to FHWA/SCDOT on August 18<sup>th</sup>. At this time, the DEIS will go to FHWA-HQ and FHWA-Atlanta for review.
- The DEIS will then be made available to the agencies via Stantec's FTP site.
- Agency comments are requested to be made in the PDF document and sent back to Will McGoldrick.
- SCDOT will send an email to the agencies with instructions and the link to the FTP site.

### Section 6(f) Overview

- Stantec gave a presentation (copy sent to agencies) to provide an update on the Section 6(f).
- National Park Service (NPS) and SC Parks Recreation & Tourism (SCPRT) will receive all the materials and the Draft Environmental Assessment.



August 12, 2020  
I-526 LCC WEST Agency Coordination Meeting  
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- It was noted that the Final EIS & Record of Decision cannot be approved without the Section 6(f)

**Discussion/Questions**

- The Public Hearing Advertisement will include a statement about the Section 6(f) Environmental Assessment
- A Draft of the Public Hearing Advertisement will be provided to NPS/SCPRT for review.

**Next Meeting September 9, 2020 at 10:00 AM via TEAMS, Outlook invite sent.**



# DRAFT Meeting Summary

## I-526 LCC WEST Agency Coordination Meeting

Microsoft Teams

October 14, 2020 10:00AM

### Attendees

<b>FHWA</b>	Shane Belcher Sandra Saint-Surin	<b>NOAA-NMFS</b>	Cindy Cooksey Brian Rossegger
<b>NPS</b>	Alexis John	<b>USACE</b>	Richard Darden
<b>USCG</b>	Randall Overton	<b>USEPA</b>	
<b>USFWS</b>	Lindsey Troutman	<b>SCDAH</b>	Elizabeth Johnson
<b>SCDHEC</b>	Logan Ress Chuck Hightower	<b>SCDHEC-OCRM</b>	Josh Hoke Chris Stout
<b>SCDNR</b>		<b>SCDOT</b>	Joy Riley Chad Long Will McGoldrick
<b>SCPRT</b>	Justin Hancock		
<b>Three Oaks Engineering</b>	Mark Mohr Karen Taylor	<b>Stantec</b>	
<b>HDR</b>	Blair Wade		

### Introductions

The purpose of this meeting is to provide agencies with an update on the agency milestone dates, shared use path (SUP), Draft Environmental Impact Statement (DEIS), and the upcoming public hearing and community meetings.

### Update on Eastern Black Rail Listing

- U.S. Fish and Wildlife Service (USFWS) gave an update on the October 7, 2020 final 4(d) rule on the eastern black rail with more information to be found at the following link <https://fws.gov/southeast/faq/eastern-black-rail-final-4d-rule/>. This species is listed at Threatened. Final rule is effective November 9, 2020.
- SCDOT noted that the Biological Assessment (BA) has the eastern black rail as a proposed species to be listed and will make sure documentation submitted to USFWS is still valid.
- FHWA noted the DEIS currently shows a No Effect for this species and that Section 7 consultation is complete. SCDOT will need to follow up with USFWS to confirm consultation is still considered complete.

### Agency Milestone Dates

- SCDOT gave a quick review of the Agency Milestone Table and noted that Section 7 review with the National Marine Fisheries Service (NMFS) is due back in about 30 days (the date of Conclusion of Informal Consultation/Issuance of BO is November 13, 2020)
- SCDOT noted a discrepancy that was revealed during ongoing coordination with the U.S. Coast Guard (USCG) that the date shown in the Agency Milestone Table for the USCG permit application deemed complete is supposed to be November 2021, not March 2021.
- The National Oceanic and Atmospheric Administration (NOAA) provided an update at that their part of the Section 7 consultation is in review and they are on track to make the 30 day review milestone.





## SUP

- SCDOT gave an update on the inclusion of a SUP at the Ashley River crossing as part of this project.
- As part of the public input process and in coordination with local municipalities, the need to accommodate bicycles and pedestrians along the project corridor became apparent. The area has a very prominent cyclist presence, and the I-526 crossing of the Ashley River is one of the main crossings from a connectivity and mobility standpoint. In addition, the Berkeley-Charleston-Dorchester Council of Governments (BCDCOG) recently developed a very comprehensive, regional Bike & Ped plan, and SCDOT was asked to investigate if/how some aspects of this plan could be incorporated into the I-526 LCC WEST project.
- The Project Team looked at potential options that could fit within the project and an analysis showed that it may be feasible to accommodate a SUP over the Ashley River, but the Team still needed more information to determine how this would be done.
- The I-526 Ashley River crossing currently consists of two separate structures. Constructability constraints, impacts, connection points, as well as how to perform required maintenance, required inspections, and maintain navigability all had to be considered and evaluated. It was determined that from a constructability, cost, safety, and maintenance ability that attaching the SUP to the widened upstream structure (I-526 westbound bridge) would best meet all necessary requirements, avoid, minimize, and provide a balance of impacts.
- The SUP design has not yet been finalized, but the existing structure would be widened to accommodate not only the additional lanes on the I-526 Westbound bridge but also the SUP. Additional coordination with NOAA and USFWS for impacts associated with the SUP is ongoing. Information and impacts associated with the SUP are included in the DEIS, but continued coordination is needed since it is anticipated that there will be some additional comments related to the SUP that will need to be addressed.
- All permit applications are being revised to include the SUP and are on track to be submitted to the permitting agencies by 10/15/2020.
  - The Ocean and Coastal Resource Management (OCRM) Critical Area Permit is ready to be posted tomorrow with hard copies to follow.
  - October 30, 2020 is the joint Public Notice (PN) date for the permits
  - Mailing list for PN includes parcels/property owners ½ mile up and downstream of the Ashley River to meet USCG PN requirements
  - EFH assessment will include additional pile drivings/drilled shafts associated with SUP. It is not anticipated that any new species will be impacted.
- NOAA asked if the SUP would increase wetland impacts
  - There are additional impacts anticipated at the fill slopes for the bridge approaches where the SUP ties in to slopes. There are safety constraints on the eastern end of the bridges (toward N. Charleston). The downstream side has a marina within 40-50 feet of the existing roadway. On the west side is an underwater archaeology anomaly that has not yet been surveyed, and a private boat landing associated with the Ashley Harbor Community.
- NOAA asked how SUP will be accessed.
  - A proposed/future recreational path is included in the BCDCOG Bike & Ped plan, but no details were given on how it will tie in on the West Ashley or the N. Charleston side. There are two different jurisdictions on either side of the Ashley River crossing and SCDOT still needs to work out these details with the municipalities since they will need to construct and maintain it. The future path may be a boardwalk with an access point further on down away from the bridge but most likely not within wetland area.



Construction on this section of the I-526LCC WEST project is at least 10 years out, so there is time to work out the details.

- NOAA stated there are impacts associated with boardwalks.
  - SCDOT has not committed to construct anything other than the SUP on the bridge. It will be up to municipalities to construct the future path and tie it into the SUP on the bridge. The future path will need to be behind the control-of-access (COA) fence once they add the connections to the bridge crossing of the SUP.
  - NOAA noted that the W. Ashley side has an extensive causeway leading up to the existing bridge and stated their concern that the causeway may need to be widened to accommodate the future path.
- NOAA noted that there is a potential for a lot more impacts as a result of this SUP, and not sure what these impacts will be since details of the future path and the connection the SUP on the bridge are not known at this time. Will need to do some additional research to determine how to handle this.
  - SCDOT acknowledged that additional coordination is needed with NOAA and will also include the S.C. Department of Natural Resources (SCDNR) to be part of the discussions.

#### **DEIS Update**

- DEIS is in final stages of review with FHWA. Any revisions will be addressed before document is signed late next week (10/22/2020).
- Signed DEIS will be uploaded to EPA's website on 10/23/2020 and be published in the Federal Register on 10/30/20. All the permitting notices are intended to go out on the same day.
- Anticipated to be a 60-day comment period.
- SCDOT gave a brief update on the upcoming virtual public hearing:
  - DEIS will be available to public on Nov. 4<sup>th</sup>.
  - Limited in-person public hearings (4) will be held between November and December.
  - A Draft Community Mitigation Plan has been released and a survey is currently out to obtain input on the Plan.
  - Series of small group meetings will be held November 6, 7, and 14 to get communities' feedback on mitigation plan. Meetings will be held outdoors in tents with drive-thru options as well.
  - A virtual comment session will also be held.
  - Series of zoom meetings will be held to dive into certain topics.
  - Project website will have a virtual 3-D public hearing room that will include the SCDOT project manager at the center of the room. Notice will be sent out to agencies once it becomes available.

#### **Upcoming Meetings**

- SCDOT requested to postpone the November I-526 LCC WEST agency meeting to December but use the November meeting date/time to discuss the Mark Clark Extension project.
- November meeting falls on Veteran's Day (11/11/2020), so SCDOT will coordinate with agencies to move the meeting to a week before or a week after this date.

**Next Meeting December 9, 2020 at 10:00 AM via TEAMS, Outlook invite sent.**