



## Appendix H: FHWA Support Documentation



## TABLE OF CONTENTS

**FHWA Concurrence I-526 LCC EAST PEL Initiation Letter**

**FHWA Concurrence I-526 LCC EAST PEL Coordination Point 2 Letter**

**FHWA Concurrence I-526 LCC EAST PEL Coordination Point 3 Letter**

**FHWA Concurrence I-526 LCC EAST PEL Coordination Point 4 Letter**

March 23, 2020

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

Subject: Proposed Planning and Environmental Linkages Study: I-526 Lowcountry Corridor EAST  
Project, Berkeley and Charleston Counties

Dear Ms. Lawton:

The South Carolina Department of Transportation (SCDOT) in cooperation with the Federal Highway Administration (FHWA), is evaluating existing and future transportation demands for the entire I-526 corridor from just south of Paul Cantrell Boulevard in West Ashley to just south of US 17 in Mount Pleasant. Named the I-526 Lowcountry Corridor (I-526 LCC), this effort is intended to improve the operational characteristics within the corridor for both local and through traffic. SCDOT has separated the I-526 LCC into two separate projects: the I-526 LCC EAST project and the I-526 LCC WEST project. This letter serves to confirm coordination with FHWA on the I-526 LCC EAST project which will evaluate approximately ten miles of I-526 from Virginia Avenue in North Charleston to US 17 in Mount Pleasant.

In coordination with FHWA staff, SCDOT has determined that a Planning Environmental Linkages (PEL) Study will be prepared for the I-526 LCC EAST project. A PEL study is a collaborative approach to decision-making used to identify transportation issues and environmental concerns. This integrated approach considers environmental, community, and economic goals early in the planning process and uses this information to streamline the transportation project development and environmental review process. The resulting information of a PEL study can be carried forward into the next phase of the project development process, the National Environmental Policy Act (NEPA) process.

Four formal Coordination Points are proposed for the I-526 LCC East PEL study:

- Coordination Point 1 - Determining the reason for the PEL study
- Coordination Point 2 - Purpose and Need
- Coordination Point 3 - Alternatives to be evaluated during the PEL study
- Coordination Point 4 - PEL Document (draft and final review)



March 23, 2020

The Coordination Points are check-in points that confirm the progress to date, review any issues or concerns, and lay out next steps to achieve the next coordination point. The coordination points coincide with project milestones summarized below:

**Coordination Point 1** was discussed on March 22, 2019 during the I-526 Status Update Meeting held at SCDOT. Due to the major river crossings along the I-526 LCC EAST corridor, identifying feasible project alternatives and cost estimates are challenging without extensive planning efforts. Additionally, this corridor serves as a major economic connector in the lowcountry, linking the goods that flow to and from South Carolina's busiest port terminal with Interstate 26 and other integral components of the state's freight network. For these reasons, both SCDOT and FHWA determined that the I-526 LCC EAST project will move forward as a PEL Study. This will allow the project team to extensively study the challenges and opportunities present in the area and will allow public engagement regarding possible solutions.

**Coordination Point 2** on the purpose and need statement will occur in Summer 2020. The draft purpose and need statement was presented at the Agency Coordination Effort Meeting on January 9, 2020. The draft purpose and need statement will be further refined with public comment following Public Information Meetings in the Summer of 2020. FHWA will be asked to provide formal input on the purpose and need statement.

**Coordination Point 3** on alternatives screening is scheduled to occur in Spring 2021. FHWA will have an opportunity to provide input on alternatives development, refinement, evaluation, and recommendation of alternatives to be evaluated in future NEPA studies. The output of this Coordination Point will be concurrence on:

- Alternatives evaluated in the PEL study
- Documentation of alternatives development, refinement, and evaluation
- Appropriate methodologies to be used and the level of detail required in the analysis of each alternative

**Coordination Point 4** is scheduled to occur in Summer 2021. Based on the inputs of Coordination Points 1, 2, and 3, the PEL document will be prepared. The output of Coordination Point 4 is concurrence on:

- Adequacy of the document for incorporation into future NEPA processes
- Specification for changes or additional information needed for the final document
- Recommendations for future projects and/or NEPA processes that may arise from the PEL study





March 23, 2020

At the conclusion of Coordination Point 4, SCDOT will request a final project acceptance letter from FHWA to document FHWA's involvement with the study. The FHWA acceptance letter will document the accomplishments of the PEL study, next steps necessary for the project to move forward into NEPA, and acknowledgement of the decisions made in the PEL study.

With this letter, SCDOT is formally requesting concurrence from FHWA on Coordination Point 1 –Determining the reason for the PEL study. Please see attached outline

Should you have any questions, please contact me at (803) 737-1396.

Sincerely,

  
Chad C. Long  
Director of Environmental Services

SC FHWA Division Office concurs with the above referenced coordination point. Based on the information provided to date, the planning products (decisions and/or analysis) associated with this concurrence point meets the intent of 23 U.S.C. 168 and pending any substantive changes, would be available for inclusion in future NEPA documents. Planning products must be included by adoption or reference in a final NEPA decision within 5 years of completing the PEL effort.

J. Shane Belcher Digitally signed by J. Shane Belcher  
Date: 2020.03.23 13:16:21 -04'00'

FHWA Signature

ec: Joy Riley, P.E., SCDOT Program Manager



## PLANNING AND ENVIRONMENTAL LINKAGE (PEL)

Linking Planning and NEPA is an integral part of the PEL Process that would be followed to minimize duplication of effort, promote environmental stewardship, encourage meaningful and productive public engagement, and reduce delays in project implementation.

The PEL Process framework includes:

- System planning
- Identifying the transportation need
- Identifying and engaging stakeholders throughout the community
- Defining stakeholder roles and responsibilities
- Defining and refining the travel corridor (including logical termini)
- Developing need, purpose, goals and objectives
- Developing performance measures
- Developing alternatives and defining modes of travel
- Evaluating and screening alternatives
- Identifying planning-level environmental impacts and potential mitigation options
- Documenting the evaluation process
- Developing reports to document and finalize the PEL Study, including an implementation plan and potential funding strategies

To ensure that planning products prepared as part of the PEL study are compliant and able to be adopted for future use in NEPA, the PEL study will follow the legal requirements in MAP-21 and 23 USC 168. The PEL study will be prepared to meet the thresholds identified in FHWA *Planning/Environmental Linkages Questionnaire* to 23 CFR 450, specifically 23 CFR § 450.212(b), 450.318(b), and 450 Appendix A, so that it can be used to inform the NEPA process.

In order to meet these requirements, the PEL study shall be NEPA-like and will include the following elements:

- Coordination with local, state, tribal, and federal agencies
- Public input and review of the PEL study, including opportunity for public/agency involvement in decision-making
- Document decisions in technical memorandum format including specific information such as dates, interested parties, decisions made, distribution list, etc., and
- Adherence to and completion of the FHWA *Planning/Environmental Linkages Questionnaire* that shall be included in the PEL study.

## PEL OUTLINE

Outline Section	Scope
<p>1. Introduction</p> <ul style="list-style-type: none"> <li>a. Study Area</li> <li>b. Logical Termini</li> <li>c. Planning Context</li> <li>d. FHWA Questionnaire</li> </ul>	<p>Efforts for the collection of information to include the Introduction of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II.</p> <p>FHWA's PEL Questionnaire will be included in the scope.</p> <p>The PEL process represents an approach to transportation decision making that considers environmental, community, and economic goals early in the planning stage and carries them through project development, design, and construction. A PEL study can lead to a seamless decision-making process that accomplishes the following:</p> <ul style="list-style-type: none"> <li>• Minimizes duplication of effort</li> <li>• Promotes efficient and cost-effective solutions and environmental stewardship</li> <li>• Reduces delays in project implementation</li> </ul> <p>It is not intended as a substitute for the NEPA process but as a way to streamline the NEPA process and focus project development.</p>
<p>2. Purpose and Need</p> <ul style="list-style-type: none"> <li>a. Purpose of the Project</li> <li>b. Need for Improvements</li> </ul>	<p>Efforts to complete the Purpose and Need of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 4.</p>
<p>3. Transportation Analysis</p> <ul style="list-style-type: none"> <li>a. Tools and Methodologies</li> <li>b. CHATS Travel Demand Model</li> <li>c. Bridge Studies</li> <li>d. Traffic and Safety Studies</li> </ul>	<p>Efforts to complete the Transportation Analysis section of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 3, Task 5 and Task 6.</p>
<p>4. Alternatives Evaluation Summary</p> <ul style="list-style-type: none"> <li>a. No-Action Alternative.</li> <li>b. Transportation System Management</li> <li>c. Level 1 {Purpose and Need} Alternatives Screening</li> <li>d. Level 2 {TBD} Alternatives Screening</li> <li>e. Level 3 {TBD} - if needed Alternatives Screening</li> </ul>	<p>Efforts to complete the Alternatives Evaluation section of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 3, Task 4, Task 5 and Task 6.</p>



<p>5. Agency and Public Coordination</p> <ul style="list-style-type: none"> <li>a. Agency <ul style="list-style-type: none"> <li>i. FHWA Coordination Points</li> </ul> </li> <li>b. Public Participation</li> </ul>	<p>Efforts to complete the Agency and Public Coordination section of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 4.</p> <p>Our team will need to revise the previous Public Involvement Plan and Agency Coordination Plan.</p> <p>Our team proposes four coordination points with FHWA throughout the PEL development process. These four coordination points are:</p> <ol style="list-style-type: none"> <li>1. Determine reason for PEL Study</li> <li>2. Development of Purpose and Need</li> <li>3. Evaluate and screen alternatives and identify environmental impacts and potential mitigation</li> <li>4. Finalize the PEL Document</li> </ol> <p>Our team will need to work with FHWA to confirm these specific touchpoints with FHWA.</p> <p>Our team proposes to coordination with the resource agencies at two coordination points:</p> <ol style="list-style-type: none"> <li>1. Define Travel Corridor (including inventory and evaluation of existing transportation system, land use and environmental resources in the study area</li> <li>2. Finalize the PEL Document</li> </ol> <p>Our team proposes to engage the public at two milestones during project development:</p> <ol style="list-style-type: none"> <li>1. Purpose &amp; Need and Alternatives Development</li> <li>2. Evaluation and screening of alternatives; presentation of potential environmental impacts and potential mitigation</li> </ol>
<p>6. Study Recommendations</p> <ul style="list-style-type: none"> <li>a. Alternatives to be Carried Forward</li> <li>b. Recommended Alternatives</li> <li>c. Early Action Improvements <ul style="list-style-type: none"> <li>i. Identify Phasing Program Options</li> </ul> </li> </ul>	<p>Efforts to complete the Study Recommendations section of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 4 and Task 6.</p>

<p>7. Environmental Review</p> <p>a. Resources</p> <ul style="list-style-type: none"> <li>i. Natural Resources</li> <li>ii. EFH</li> <li>iii. Wetlands</li> <li>iv. Farmlands</li> <li>v. Hazardous Materials</li> <li>vi. Cultural Resources – historic and archaeology</li> <li>vii. Displacements</li> <li>viii. Air Quality</li> <li>ix. Land Use</li> <li>x. Section 4(f)/Section 6(f)</li> <li>xi. Social and Economic</li> <li>xii. Environmental Justice</li> <li>xiii. Noise</li> </ul> <p>b. Potential Impacts</p> <p>c. Indirect and Cumulative Impacts</p>	<p>Efforts to complete the Environmental Review section of the PEL are currently included in the SCOPE OF SERVICES for the I-526 Corridor Improvements Phase II, under Task 4.</p> <p><i>PEL study environmental evaluations do not need to address all regulatory requirements that should be addressed in a NEPA study. Instead, the PEL study should provide context on environmental constraints but rarely will include detailed environmental studies. If detailed environmental studies are available, that level of detailed data will be included in the PEL document.</i></p>
<p>8. Next Steps</p> <p>d. Road Map to Implementation</p> <ul style="list-style-type: none"> <li>i. Outstanding Issues</li> <li>ii. Action Plan</li> </ul> <p>5. Scoping into NEPA</p> <p>e. Potential Funding Strategies</p> <ul style="list-style-type: none"> <li>i. PPP</li> <li>ii. Non-federal Dollars</li> <li>iii. Managed Lanes (Toll Revenue)</li> </ul>	<p>Efforts to complete the Next Steps section of the PEL could be performed under Task 14 although that was not the original intent.</p>

February 18, 2021

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

**Subject:** Request for Concurrence on Coordination Point 2 – Purpose and Need on the I-526 Lowcountry Corridor EAST Planning and Environmental Linkages Project, Berkeley and Charleston Counties

Dear Ms. Lawton:

The South Carolina Department of Transportation (SCDOT) in cooperation with the Federal Highway Administration (FHWA), is conducting a Planning and Environmental Linkages (PEL) Study for the I-526 Lowcountry Corridor EAST, an approximately ten mile corridor on I-526 from Virginia Avenue in North Charleston to US 17 in Mount Pleasant.

There are four formal Coordination Points between SCDOT and FHWA that have been detailed in previous communications including:

- Coordination Point 1 — Determining the reason for the PEL Study, Coordination Point 1 was confirmed by FHWA on March 23, 2020.
- Coordination Point 2 — Purpose and Need
- Coordination Point 3 — Alternatives to be evaluated during the PEL study
- Coordination Point 4 — PEL Document (draft and final review)

This letter serves to formally request FHWA concurrence on Coordination Point 2 – Purpose and Need. SCDOT and FHWA have been working with the study team to develop and refine the Purpose and Need for the PEL. The Draft Purpose and Need was made available for stakeholder and public input and comment from July 15 to August 15, 2020. The Purpose and Need Statement is enclosed under separate cover.



The SCDOT is formally requesting concurrence from the FHWA on Coordination Point 2 – Purpose and Need. Should you have any questions, please contact me at (803) 737-1396.

Sincerely,  
  
Chad C. Long  
Director of Environmental Services

SC FHWA Division Office concurs with the above referenced coordination point. Based on the information provided to date, the planning products (decisions and/or analysis) associated with this concurrence point meets the intent of 23 U.S.C. 168 and pending any substantive changes, would be available for inclusion in future NEPA documents. Planning products must be included by adoption or reference in a final NEPA decision within 5 years of completing the PEL effort.

J. Shane Belcher Digitally signed by J. Shane Belcher  
Date: 2021.02.18 13:04:11 -05'00'

FHWA Signature

ENC: I-526 LCC EAST Draft Purpose and Need Statement, December 2020

CC: Joy Riley, PE SCDOT Program Manager





August 24, 2021

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

**Subject:** Request for Concurrence on Coordination Point 3 – Alternatives to be evaluated during the I-526 Lowcountry Corridor EAST Planning and Environmental Linkages Project, Berkeley and Charleston Counties

Dear Ms. Lawton:

The South Carolina Department of Transportation (SCDOT) in cooperation with the Federal Highway Administration (FHWA), is conducting a Planning and Environmental Linkages (PEL) Study for the I-526 Lowcountry Corridor EAST, an approximately ten mile corridor on I-526 from Virginia Avenue in North Charleston to US 17 in Mount Pleasant.

There are four formal Coordination Points between SCDOT and FHWA that have been detailed in previous communications including:

- Coordination Point 1 — Determining the reason for the PEL Study, Coordination Point 1 was confirmed by FHWA on March 23, 2020.
- Coordination Point 2 — Purpose and Need, Coordination Point 2 was confirmed by FHWA on February 18, 2021.
- Coordination Point 3 — Alternatives to be evaluated during the PEL study
- Coordination Point 4 — PEL Document (draft and final review)

This letter serves to formally request FHWA concurrence on Coordination Point 3 – Alternatives to be evaluated during the PEL study. SCDOT and FHWA have been working with the study team to develop and refine the conceptual alternatives and screening methodology as part of the PEL study. The full alternatives development and analysis is documented in the Alternatives Analysis Technical Memorandum dated August 2021 and is enclosed under separate cover.



The SCDOT is formally requesting concurrence from the FHWA on Coordination Point 3 – Alternatives to be evaluated during the PEL study. Should you have any questions, please contact me at (803) 737-1396.

Sincerely,

  
Chad C. Long  
SCDOT Director of Environmental

SC FHWA Division Office concurs with the above referenced coordination point. Based on the information provided to date, the planning products (decisions and/or analysis) associated with this concurrence point meets the intent of 23 U.S.C. 168 and pending any substantive changes, would be available for inclusion in future NEPA documents. Planning products must be included by adoption or reference in a final NEPA decision within 5 years of completing the PEL effort.

  
FHWA Signature

ENC: I-526 LCC EAST Alternatives Analysis Technical Memorandum, August 2021

EC: Joy Riley, PE

July 13, 2022

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

**Subject:** Request for Concurrence on Coordination Point 4 – PEL Document, I-526  
Lowcountry Corridor EAST Planning and Environmental Linkages Project,  
Berkeley and Charleston Counties

Dear Ms. Lawton:

The South Carolina Department of Transportation (SCDOT) in cooperation with the Federal Highway Administration (FHWA), has completed a Planning and Environmental Linkages (PEL) Study for the I-526 Lowcountry Corridor EAST, an approximately ten mile corridor on I-526 from Virginia Avenue in North Charleston to US 17 in Mount Pleasant.

There are four formal Coordination Points between SCDOT and FHWA that have been detailed in previous communications including:

- Coordination Point 1 — Determining the reason for the PEL Study, Coordination Point 1 was confirmed by FHWA on March 23, 2020.
- Coordination Point 2 — Purpose and Need, Coordination Point 2 was confirmed by FHWA on February 18, 2021.
- Coordination Point 3 — Alternatives to be evaluated during the PEL study, Coordination Point 3 was confirmed by FHWA on September 13, 2021.
- Coordination Point 4 — PEL Document (draft and final review)

This letter serves to formally request FHWA concurrence on Coordination Point 4 – PEL Document (draft and final review). SCDOT, FHWA, and the Charleston Area Transportation Study (CHATS) have reviewed the draft PEL Report and FHWA PEL Questionnaire and have been working with the study team to review the PEL documentation and refine the reasonable alternatives.

This PEL study was undertaken in a manner consistent with the FHWA PEL guidance which outlines a process similar to that required by the National Environmental Policy Act (NEPA). The completed FHWA PEL Questionnaire (Appendix I of the PEL document) provides



a good summary of the work completed in the PEL study and the information that will be needed once the project is funded and enters into the NEPA process. The I-526 LCC EAST PEL Study Report dated July 2022 and Appendices A through I are enclosed under separate cover.

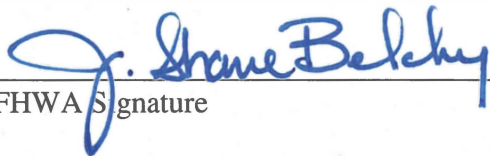
The SCDOT is formally requesting concurrence from the FHWA on Coordination Point 4 – PEL Document (draft and final review). Should you have any questions, please contact me at (803) 737-1346.

Sincerely,



Chad C. Long  
SCDOT Director of Environmental Services

SC FHWA Division Office concurs with the above referenced coordination point. Based on the information provided to date, the planning products (decisions and/or analysis) associated with this concurrence point meets the intent of 23 U.S.C. 168 and pending any substantive changes, would be available for inclusion in future NEPA documents. Planning products must be included by adoption or reference in a final NEPA decision within 5 years of completing the PEL effort.



FHWA Signature

J. Shane Belcher

Digitally signed by J. Shane  
Belcher  
Date: 2022.07.19 10:51:35 -04'00'

ENC: I-526 LCC EAST PEL Study Report, July 2022 and Appendices A through I

EC: Joy Riley, SCDOT

