



Appendix A

Agency Coordination Plan

March 2021



AGENCY COORDINATION PLAN



U.S. Department of Transportation
Federal Highway Administration



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1.0 INTRODUCTION

1.1 INTRODUCTION OF THE PROJECT

The South Carolina Department of Transportation (SCDOT), Federal Highway Administration (FHWA), and Beaufort County propose improvements to the US 278 corridor between Bluffton and Hilton Head Island in Beaufort County, South Carolina. The project study area (PSA) extends from Moss Creek Drive to Wild Horse/Spanish Wells Road for approximately 4.11 miles (Figure 1). The project includes replacement of the eastbound Mackay Creek bridge and potential improvements to the three other bridges located within the PSA. The three additional bridges to be improved include the westbound Mackay Creek, the eastbound Skull Creek and the westbound Skull Creek bridge. Improved access to the Pinckney Island National Wildlife Refuge (PINWR) and the C.C. Haigh, Jr. boat ramp is also proposed as part of this project.

The purpose of this project is to address structural deficiencies at existing eastbound MacKay Creek, to reduce congestion along US 278 from Moss Creek Drive to Spanish Wells Road.

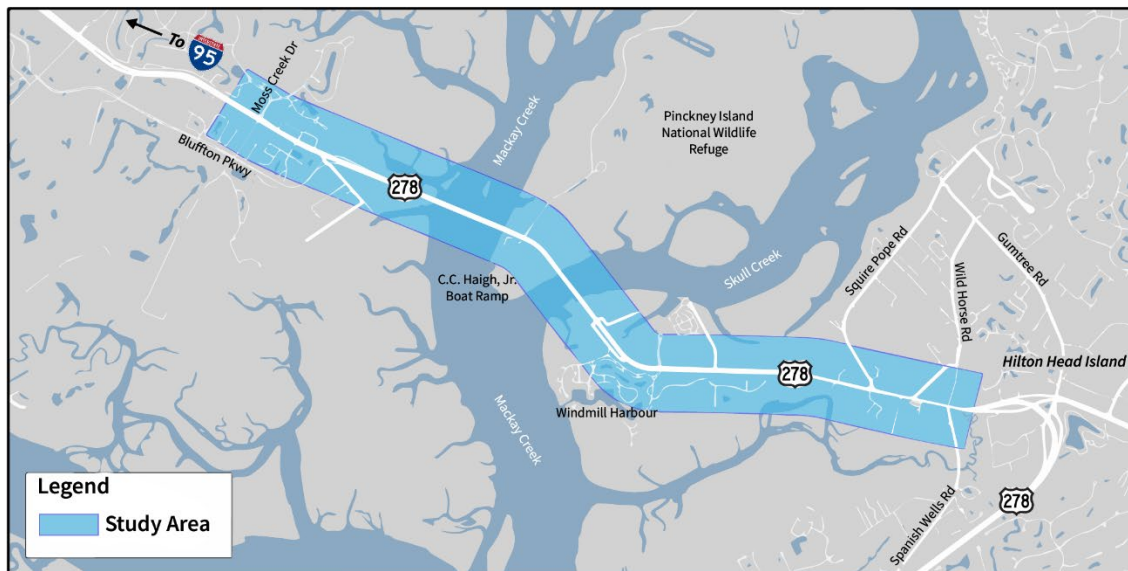


Figure 1: US 278 Corridor Improvements Project Study Area

1.2 PURPOSE OF AGENCY COORDINATION PLAN

In an effort to provide for more efficient environmental reviews for project decision-making, Section 6002 of Public Law 104-59, the Safe, Accountable, Flexible, Efficient Transportation Act: A Legacy for Users (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 coordination of public and agency involvement during the environmental review process.

The purpose of this plan is to define the process by which SCDOT and FHWA will communicate information about the US 278 Corridor Improvement 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 EA in compliance with NEPA. 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.

Major coordination points by the participating and cooperating agencies are:

1. Agency Coordination Plan
2. Purpose & Need Statement
3. Range of Alternatives/Alternatives Carried Forward
4. Recommended Preferred Alternative

Coordination will occur at these major points in which the agencies will be offered the opportunity for comment and input. Each agency will be asked to identify a main point of contact (POC) for this project review for the exchange of information and timely comments 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 Coordination Plan is a living document and can be modified throughout the progression of the environmental review process.

2.0 AGENCY ROLES

2.1 LEAD, COOPERATING, AND PARTICIPATING AGENCIES

2.1.1 Lead Agencies

FHWA will be the Lead Federal Agency and, as such, 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 NEPA documentation, and that Cooperating Agencies be identified.

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 were 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 with reason for doing so. Copies of the confirmation letters are included in Appendix A. 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 30 days) in order to assist the agencies in making informed comments and coordination.

23 USC 139 also requires the Lead Agency to:

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

Table 2-1: Lead Agencies

Agency	Role	Contact Persons	Contact Information
FHWA	Lead Federal Agency	Shane Belcher	jeffrey.belcher@dot.gov 803-253-3187
SCDOT	Joint Lead Agency	Craig Winn David Kelly	WinnCL@scdot.org 803-737-6376 KellyDP@scdot.org 803-737-1645

2.1.2 Cooperating Agencies

In accordance with the Council of Environmental Quality (CEQ) regulations, Cooperating Agencies will be involved in the NEPA process for implementing NEPA's procedural provisions (40 Code of Federal Regulations [CFR] 1501.6). According to CEQ (40 CFR 1508.5), "cooperating agency" means any federal

agency, other than a lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. Cooperating Agencies become involved through the scoping process and in the review of the NEPA document before it is distributed to the public. This allows the NEPA document to be adopted by the Cooperating Agencies, in whole or in part, fulfil the agencies' obligations through NEPA. Cooperating Agencies were to identify information they needed 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. The list of Cooperating Agencies is shown in Table 2-2.

Table 2-2: Cooperating Agencies

Agency	Primary Responsibility	Contact Person	Contact Information	Date Invited	Date Accepted/Declined
U.S. Army Corps of Engineers (USACE)	Jurisdictional Area Determination and Section 404/10 Permitting; Wetlands and Streams expertise	Lt. Col. Jeffrey Plazzini Travis Hughes Amanda Heath	843-329-8000 Travis.G.Hughes@usace.army.mil 843-329-8046 Amanda.L.Heath@usace.army.mil 843-329-8025	March 25, 2019	Accepted April 11, 2019
U.S. Fish and Wildlife Service (USFWS)	Potential Federal Lands Access Program (FLAP) funding; Impacts to Pinckney Island National Wildlife Refuge Access; T & E Species Expertise under Section 7 of ESA.	Refuge: Russell Webb, Refuge Manager Holly Gaboriault Region Office: Tom McCoy Mark Caldwell	Russell.webb@fws.gov 843-784-9911 Holly_T_Gaboriault@fws.gov Thomas_Mccoy@fws.gov 843-727-4707 x227 Mark.Caldwell@fws.gov 843-727-4707 x215	March 25, 2019	Accepted April 22, 2019
U.S. Coast Guard (USCG)	Navigational Permitting for Bridges	Barry Dragon Randall Overton	Barry.Dragon@uscg.mil 305-415-6743 Randall.D.Overton@uscg.mil 305-415-6736	March 25, 2019	Accepted April 10, 2019

2.1.3 Participating Agencies

Participating Agencies, identified in accordance with 23 U.S.C. 139, are to provide information and identify and resolve issues. Participating Agencies are identified as those federal, state, tribal, regional, and local agencies with an interest in the project and they have specific responsibilities in the process. Participating Agencies allow FHWA and SCDOT to ensure that agencies with special expertise provide input and guidance throughout the NEPA process and the development of the EA. Some of the agencies will also be asked to provide reviews and comments on the Environmental Assessment and provide coordination on the four major coordination points described in Section 1.2. Their roles and responsibilities include, but are not limited to:

- Participating in the NEPA process starting at the earliest possible time, especially regarding the development of the purpose and need statement, range of alternatives, methodologies, and the level of detail for the analysis of alternatives.
- Identifying, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts. Participating agencies also may participate in the issue resolution process described late in this guidance.

- Providing meaningful and timely input on unresolved issues.
- Participating in the scoping process. The scoping process should be designed so that agencies whose interest in the project comes to light as a result of initial scoping activities are invited to participate and still have an opportunity for involvement.

Table 2-3 lists the agencies that were invited to become Participating Agencies.

Table 2-3: Participating Agencies

Agency	Primary Responsibility	Contact Person	Contact Information	Date Invited	Date Accepted/Declined
Federal Agencies					
Environmental Protection Agency (USEPA)	NEPA/Environmental Justice	Chris Militscher	Militscher.Chris@epa.gov 404-562-9512	March 25, 2019	Accepted May 6, 2019
	Section 404, Section 401, Water Quality	Alya Singh-White	Singh-white.alya@epa.gov 404-562-9339		
		Kelly Laycock	Laycock.Kelly@eps.gov 404-562-9132		
NOAA National Marine Fisheries Service (NMFS)	Essential Fish Habitat	Charleston: Pace Wilber	Pace.Wilber@noaa.gov 843-762-8601	March 25, 2019	Accepted April 24, 2019
	Endangered Species Act/Marine Mammal Protection Act Coordination	Cynthia Cooksey	Cynthia.Cooksey@noaa.gov 843-460-9922		
		St. Petersburg: Dr. Roy Crabtree	Roy.Crabtree@noaa.gov Kelly.Shotts@noaa.gov 727-824-5312		
		Kelly Shotts			
Sovereign Nations					
Catawba Indian Nation (CIN)	Historic/cultural resources review	Wenonah Haire, THPO Caitlin Totherow	Wenonahh@ccppcrafts.com 803-328-2427 x224 Caitlinh@ccppcrafts.com 803-328-2427 x226	March 25, 2019	Accepted May 3, 2019
Eastern Shawnee Tribe	Historic/cultural resources review	Brett Barnes, THPO	Bbarnes@estoo.net 918-666-5151 x1845	March 25, 2019	
Muscogee (Creek) Nation	Historic/cultural resources review	Corain Lowe-Zepeda, THPO LeeAnne Wendt (Section 106 Contact)	Clowe@mcn-nsn.gov 918-732-7835 Lwendt@mcn-nsn.gov 918-732-7852	March 25, 2019	
State Agencies					
South Carolina Department of Archives and History (SCDAH)	Archaeological and Historical Resources consultation, Section 106 review	Elizabeth Johnson Joe Wilkinson	EJohnson@scdah.sc.gov 803-896-6168 JWilkinson@scdah.sc.gov 803-896-6184	March 25, 2019	Accepted April 3, 2019
South Carolina Department of Health & Environmental Control (SCDHEC)	Jurisdiction of Critical Areas, Critical Area Permitting, Air, and Section 401 Water Quality & CZM consistency determinations; wetlands and stream expertise	Chuck Hightower	HighttoCW@dhec.sc.gov 803-898-0369	March 25, 2019	Accepted June 5, 2019

South Carolina Department of Health & Environmental Control; Ocean & Coastal Resource Management (SCDHEC-OCRM)	Jurisdiction of Critical Areas, Critical Area Permitting, Air, and Section 401 Water Quality & CZM consistency determinations; wetlands and stream expertise	Blair Williams Chris Stout	Williabn@dhec.sc.gov 843-953-0232 Stoutcm@dhec.sc.gov 843-953-0691	March 25, 2019	Accepted June 5, 2019
South Carolina Department of Natural Resources (SCDNR)	State Protected Species; wetlands & streams expertise	Robert H. Boyles, Jr. Lorianne Riggan Susan Davis	BoylesR@dnr.sc.gov 803-734-4007 RigganL@dnr.sc.gov 803-734-4199 DavisS@dnr.sc.gov 843-953-9003	March 25, 2019	Accepted April 10, 2019
Local Agencies					
Beaufort County	Funding	Rob McFee	RMcfee@bcgov.net	March 25, 2019	Accepted April 4, 2019

2.2 AGENCY COORDINATION MEETINGS

The project was presented at the Agency Coordination Effort (ACE) meetings hosted by SCDOT. The following meetings were attended, and meeting summaries are included in Appendix B. Table 2-4 summarizes the coordination points and dates for the project.

- Agency project kickoff, scoping, and purpose statement – held February 14, 2019
- A meeting to discuss the alternative evaluation criteria, alternatives analysis process, and preliminary range of alternatives - June 13, 2019 & August 8, 2019
- A meeting to discuss the Reasonable Alternatives and the Preferred Alternative – March 12, 2020 & May 14, 2020.

2.2.1 Agency Project Kickoff and Scoping Meeting

The initial Agency Coordination Meeting was held on February 14, 2019 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.

2.2.2 Alternative Evaluation Criteria, Alternative Analysis Process, and Preliminary Range of Alternatives

A meeting was held on June 13, 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 are 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. On August 8, 2019, a third meeting was attended to present and discuss the full range of preliminary alternatives, the evaluation criteria, and the proposed reasonable alternatives. Following this meeting, FHWA and SCDOT requested coordination.

Table 2-4: Coordination Tracking

Agency	Coordination Point	Coordination Date
Federal Agencies		
U.S. Army Corps of Engineers (USACE)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
U.S. Fish and Wildlife Service (USFWS) Savannah Coastal Refuges Complex	Agency Coordination Plan	March 28, 2019
	Purpose & Need Statement	March 28, 2019
U.S. Coast Guard (USCG)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
Environmental Protection Agency (USEPA)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
NOAA National Marine Fisheries Service (NMFS)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
NOAA National Marine Fisheries Service (NMFS)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
Native American Tribes		
Catawba Indian Nation (CIN)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
Eastern Shawnee Tribe	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
Muscogee (Creek) Nation	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
State Agencies		
South Carolina Department of Archives and History (SCDAH)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
South Carolina Department of Health & Environmental Control (SCDHEC)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
South Carolina Department of Health & Environmental Control; Ocean & Coastal Resource Management (SCDHEC-OCRM)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
South Carolina Department of Natural Resources (SCDNR)	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019
Local Agencies		
Beaufort County	Agency Coordination Plan	March 25, 2019
	Purpose & Need Statement	March 25, 2019

2.2.3 Reasonable Alternatives and Recommended Preferred Alternative

The March 12, 2020 ACE meeting was attended to present the impacts and benefits of the Proposed Reasonable Alternatives and the Recommended Preferred Alternative. Preliminary Essential Fish Habitat (EFH) assessment and future mitigation planning was also discussed. A follow-up ACE meeting, on May 14, 2020, was attended to further discuss impacts associated with each of the Proposed Reasonable Alternatives and to present the Recommended Preferred Alternative. Following this meeting, FHWA and SCDOT requested coordination.

2.2.4 Pinckney Island National Wildlife Refuge

SCDOT and FHWA coordinated with the USFWS PINWR staff to discuss the potential impacts to the property and the C.C. Haigh, Jr. boat ramp. Coordination meetings with PINWR were completed at the scoping, Preliminary Range of Alternatives, Proposed Reasonable Alternatives, and Recommended Preferred Alternative. USFWS meeting summaries are in Appendix C.

- The first USFWS meeting on March 4, 2019 served as the preliminary scoping meeting and initiated coordination with USFWS and the PINWR.
- On June 25, 2019, a second meeting with USFWS was held to discuss the Preliminary Range of Alternatives and the criteria used to evaluate these alternatives.
- A third USFWS meeting was held on July 23, 2019 to discuss the draft results of the preliminary alternative analysis and the Proposed Reasonable Alternatives.
- A USFWS meeting was also held on October 9, 2019 to discuss the public input received at the September 19, 2019 PIM and to follow up on the Proposed Reasonable Alternatives.
- A USFWS meeting was held on January 30, 2020 to explain revisions made to the Proposed Reasonable Alternatives based on public and agency input and solicit comments from USFWS on the least impactful alternatives.
- On May 7, 2020, a meeting was held to discuss the Recommended Preferred Alternative and Section 4(f). USFWS agreed the net result of the proposed improvements is an overall enhancement of the Section 4(f) property when compared to the future do-nothing alternative and the present condition of the Section 4(f) property.

2.2.5 Jurisdictional Determination Coordination

SCDOT and FHWA will request an onsite meeting with USACE prior to submitting the jurisdictional determination. This field visit will be utilized to review the proposed wetland and waters of the U.S. delineation. After the site visit, the jurisdictional determination drawings will be updated and submitted to USACE for approval.

2.2.6 Endangered Species Act, Marine Mammal Protection Act, and Magnuson-Stevens Fishery Conservation and Management Act

SCDOT and FHWA coordinated with USFWS and NOAA-NMFS at the March 12, 2020 ACE meeting to discuss potential impacts to threatened and endangered species, marine mammals, and essential fish habitat.

On July 22, 2020, SCDOT and FHWA submitted the Biological Evaluation requesting consultation with USFWS for species under their jurisdiction in compliance with Section 7 of the Endangered Species Act (ESA). On July 28, 2020, USFWS concurred with SCDOT's determination of "may effect, not likely to adversely affect" for the 11 species that may occur in the project area. A revised Biological Evaluation based on the refinements to the Recommended Preferred Alternative 4A was submitted to USFWS and NOAA on February 19, 2021.

On July 28, 2020, SCDOT and FHWA submitted an EFH Assessment and requested consultation with NOAA-NMFS as prescribed by the Magnuson-Stevens Act for the Proposed US 278 Corridor Improvement Project in Beaufort County, SC. A revised EFH Assessment based on the refinements to the Recommended Preferred Alternative 4A was submitted to NOAA.

2.2.7 Section 106 Requirements

Fulfillment of Section 106 requirements under the National Historic Preservation Act will be completed. SCDOT and FHWA provided the South Carolina State Historic Preservation Office with the Draft Cultural Resources Report on May 1, 2020. Based on archaeological sites being present on the PINWR, the USFWS

was provided the Draft Cultural Resources Report for review on April 27, 2020. Comments from USFWS were received on May 20, 2020.

2.2.8 Tribal Coordination

Coordination to solicit input from Federally recognized Native American Tribes was conducted for this project. Draft and Final versions of the cultural resources report will be provided for comment.

2.2.9 Title VI

SCDOT complies with all requirements set forth by federal regulations issued by the U.S. Department of Transportation under the Title VI of the Civil Rights Act of 1964, as amended. Any persons who believe that he or she has been discriminated against because of race, color, religion, sex, age, handicap or disability, or national origin under a program receiving federal aid has the right to file a complaint with SCDOT. The complaint shall be filed with the Title VI Program Compliance Coordinator, at the Office of Business Development & Special programs, 955 Park Street, Suite 117, Columbia, SC 29202 or at 803.737.5095. The complaint should be submitted no later than 180 days after the date of the alleged act of discrimination. It should outline as completely as possible the facts and circumstances of the incident and should be signed by the person making the complaint.

Specific efforts will be made to increase participation by traditionally under-represented populations and groups, as required under Title VI of the Civil Rights Act of 1964 and to track participation by these groups.

2.3 COORDINATION POINTS

The FHWA and SCDOT will seek written coordination on the following points:

1. Agency Coordination Plan
2. Purpose & Need Statement
3. Range of Alternatives/Alternatives Carried Forward
4. Preferred Alternative

2.4 DOCUMENT REVIEW

Those agencies with authority or particular expertise will also be asked to review technical documentation, such as the Jurisdictional Determination request (USACE & SCDHEC-OCRM), the Cultural Resources Report (Tribal Nations and SHPO), and the Natural Resources Technical Report (USFWS, NMFS, SCDNR, and SCDHEC).

2.5 PERMITTING

Based on early coordination with the USCG, a determination of the need for a USCG permit has been made. 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 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

3.0 SCHEDULE

Table 3-1 Draft NEPA/Permitting Schedule

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>February 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 25, 2019
Agencies review draft Purpose and Need Statement & Agency Coordination Plan	April-May 2019
Coordination Point for Agency Coordination Plan and Purpose and Need Statement	May 2019
<i>Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives</i>	<i>June 13, 2019</i>
Agencies Review the Preliminary Range of Alternatives for Coordination	June/July 2019
ACE Meeting to present potential impacts of the Range of Alternatives and Alternatives to be carried forward	August 8, 2019
Coordination Point for Range of Alternatives/Alternatives Carried Forward by Agencies	August 2019
Public Information Meeting	September 19, 2019
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall-Winter 2019
2020	
<i>Agency Meeting to discuss potential impacts of the Reasonable Alternatives and recommendation of a Preferred Alternative</i>	March 12, 2020 & May 14, 2020
Agency Meeting and Coordination Point for Preferred Alternative by Agencies	May 2020
Submit Preliminary Jurisdictional Determination to USACE & Critical Area to SCDHEC-OCRM	Summer 2020
Pre-Application Meeting with USACE and SCDHEC	Summer/Fall 2020
Draft EA issued; Joint USACE Individual Permit and USCG Public Notices	Fall 2020
Public Hearing	Fall/Winter 2020
2021	
Prepare Final NEPA Decision	Early 2021
FHWA Issues Final NEPA Decision	Early 2021
USACE and USCG Issue Permit Decisions	Early 2021

4.0 REVISIONS

Version	Date	Person Making Revision	Description of Changes
2	April 2019	Heather Robbins (3Oaks)	Added dates to Table 2-2 and Table 2-3. Coordination dates added to Table 2-4. Updated dates in Table 3-1
3	June 2019	Heather Robbins (3Oaks)	Updated Table 2-3 & Table 3-1 Coordination dates added to Table 2-4
4	May 2020	Heather Robbins (3Oaks)	Coordination dates added to Table 2-4
5	June 2020	Heather Robbins (3Oaks)	Coordination dates added to Table 2-4
6	July 2020	Geni Theriot (3Oaks)	Coordination dates added to Section 2.2.6
7	February 2021	Heather Robbins (KCI)	Coordination dates added to Section 2.2.6



Appendix A

Cooperating and Participating Agency Letters



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Lt. Colonel Jeffrey Palazzini
Commander, Charleston District
U.S. Army Corps of Engineers
69A Hagood Avenue
Charleston, SC 29403

Subject: Invitation to Become a Cooperating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Lt. Col. Palazzini:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA, in coordination with your office has determined that a Section 404 Permit will likely be required for the proposed improvements. Since your agency has legal jurisdiction over such permits, we are inviting you to become a Cooperating Agency along with the FHWA in the development of the EA. Cooperating agencies are by definition participating agencies but they have a higher degree of authority, responsibility and involvement in the environmental process. Areas of concern to be emphasized in the EA will include potential environmental impacts upon

existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your agency's participation as a Cooperating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).**

Your agency's involvement in the proposed project would entail those areas under its jurisdiction. No direct writing or analysis by your agency will be necessary for this document unless you request to do so. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Participate in coordination meetings as appropriate.
2. Consultation on any relevant technical studies that may be required for the project.
3. Timely review and comment on the environment document to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

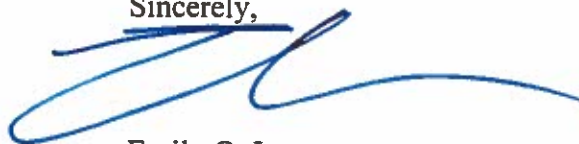
You have the right to expect that the EA will enable your agency to fulfill its jurisdictional responsibilities. Likewise, your agency has the obligation to tell us if, at any point in the process, your agency's needs are not being met. We expect that at the end of the process the EA will satisfy your agency's NEPA requirements including those related to project alternatives, environmental consequences, navigational clearances, and mitigation. Further, we intend to utilize the EA as our decision-making document for the Section 404 permit application.

To become a Cooperating Agency with the FHWA, please respond to this office in writing with an acceptance or denial of the invitation within 30 days. If you accept, please identify the appropriate contact person within your organization for coordination. If your agency declines, please provide a written response that states your reason for declining the invitation, such as:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Travis Hughes, USACE Regulatory Division Chief
Ms. Amanda Heath, USACE Chief, Special Projects Branch
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Commander, U.S. Coast Guard Seventh District
Attn: Bridge Administration (dpb)
909 SE 1st Ave Suite 432
Miami, FL 33131

Subject: Invitation to Become a Cooperating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Commander:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA, in coordination with your office has determined that a U.S. Coast Guard Bridge Permit will be required for the proposed improvements of the Mackay and Skull Creek Bridges. Since your agency has legal jurisdiction over such permits, we are inviting you to become a Cooperating Agency along with the FHWA in the development of the EA. Cooperating agencies are by definition participating agencies but they have a higher degree of authority, responsibility and involvement in the environmental process. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water

resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your agency's participation as a Cooperating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).**

Your agency's involvement in the proposed project would entail those areas under its jurisdiction. No direct writing or analysis by your agency will be necessary for this document unless you request to do so. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Participate in coordination meetings as appropriate.
2. Consultation on any relevant technical studies that may be required for the project.
3. Timely review and comment on the environment document to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

You have the right to expect that the EA will enable your agency to fulfill its jurisdictional responsibilities. Likewise, your agency has the obligation to tell us if, at any point in the process, your agency's needs are not being met. We expect that at the end of the process the EA will satisfy your agency's NEPA requirements including those related to project alternatives, environmental consequences, navigational clearances, and mitigation. Further, we intend to utilize the EA as our decision-making document for the U.S. Coast Guard permit application.

To become a Cooperating Agency with the FHWA, please respond to this office in writing with an acceptance or denial of the invitation within 30 days. If you accept, please identify the appropriate contact person within your organization for coordination. If your agency declines, please provide a written response that states your reason for declining the invitation, such as:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

cc: Mr. Barry Dragon, USCG 7th District Director, Bridge Branch
Mr. Randall Overton, USCG 7th District Permitting Agent
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 28, 2019

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

In Reply Refer To:
HDA-SC

Ms. Holly Gaboriault
Project Leader
Savannah Coastal Refuges Complex
694 Beech Lane
Hardeeville, SC 29927

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Ms. Gaboriault:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

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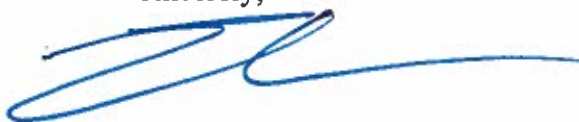
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If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Tom McCoy, USFWS Field Supervisor Charleston
Mr. Russell Webb, Pinckney Island NWR Manager
Mr. Mark Caldwell, USFWS Regulatory Team Leader Charleston
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 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 and Certification Manager
SC Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Hightower:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

Your agency's involvement in the proposed project would entail those areas under its jurisdiction. No direct writing or analysis by your agency will be necessary for this document unless you request to do so. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

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To become a Participating Agency with the FHWA, please respond to this office in writing with an acceptance or denial of the invitation within 30 days. If you accept, please identify the appropriate contact person within your organization for coordination. If your agency declines, please provide a written response that states your reason for declining the invitation, such as:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project;
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

cc: Mr. Blair Williams, SCDHEC-OCRM Critical Area Permitting Section Manager
Mr. Chris Stout, SCDHEC-OCRM Coastal Zone Consistency Section Manager
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Mr. Alvin A. Taylor
Director, SC Department of Natural Resources
Attn: Lorianne Riggins
Rembert C. Dennis Bldg.
1000 Assembly Street
Columbia, SC 29201

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Taylor:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and

indirect impacts, and potential impacts due to project construction. Along with requesting your agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

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- Has no expertise or information relevant to the project;
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If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Ms. Lorianne Riggin, SCDNR Director of Environmental Program
Ms. Susan Davis, SCDNR
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



U.S. Department
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**Federal Highway
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South Carolina

March 25, 2019

1835 Assembly Street, Suite 1270
Columbia, South Carolina 29201
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In Reply Refer To:
HDA-SC

Mr. Rob McFee, P.E.
Director of Construction, Engineering & Facilities
Beaufort County
2266 Boundary Street
Beaufort, SC 29902

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. McFee:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

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If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 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
Attn: Kelly Shotts
263 13th Avenue South
St. Petersburg, FL 33701

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Dr. Crabtree:

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Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Ms. Kelly Shotts, NOAA Fisheries
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

1835 Assembly Street, Suite 1270
Columbia, South Carolina 29201
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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 29405

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Williams:

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Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

cc: Mr. Chris Stout, SCDHEC-OCRM Coastal Zone Consistency Section Manager
Mr. Chuck Hightower, SCDHEC Water Quality Permitting & Certification Manager
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



U.S. Department
of Transportation
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South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Mr. Chris Militscher
Chief, NEPA Program Office
U.S. Environmental Protection Agency
61 Forsyth Street, SW 9T25
Atlanta, GA 30303-8960

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Militscher:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

Your agency's involvement in the proposed project would entail those areas under its jurisdiction. No direct writing or analysis by your agency will be necessary for this document unless you request to do so. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

1. Participate in coordination meetings as appropriate.
2. Consultation on any relevant technical studies that may be required for the project.
3. Timely review and comment on the environment document to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

To become a Participating Agency with the FHWA, please respond to this office in writing with an acceptance or denial of the invitation within 30 days. If you accept, please identify the appropriate contact person within your organization for coordination. If your agency declines, please provide a written response that states your reason for declining the invitation, such as:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project;
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

cc: Ms. Alya Singh-White, U.S. EPA
Mr. Kelly Laycock, U.S. EPA
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Ms. Wenonah Haire
Tribal Historic Preservation Officer
Catawba Indian Nation
1536 Tom Steven Road
Rock Hill, SC 29730

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Ms. Haire:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

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- Has no expertise or information relevant to the project;
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

cc: Ms. Caitlin Totherow, Catawba Indian Nation
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Mr. Pace Wilber
South Atlantic Branch Supervisor
NOAA Fisheries
331 Fort Johnson Road
Charleston, SC 29412

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Wilber:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

Your agency's involvement in the proposed project would entail those areas under its jurisdiction. No direct writing or analysis by your agency will be necessary for this document unless you request to do so. We suggest that your agency's role in the development of the above project should include the following as they relate to your area of expertise:

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To become a Participating Agency with the FHWA, please respond to this office in writing with an acceptance or denial of the invitation within 30 days. If you accept, please identify the appropriate contact person within your organization for coordination. If your agency declines, please provide a written response that states your reason for declining the invitation, such as:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project;
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Ms. Cynthia Cooksey, NOAA Fisheries
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Mr. Brett Barnes
Tribal Historic Preservation Officer
Eastern Shawnee Tribe of OK
70500 E. 128 Road
Wyandotte, OK 74370

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Mr. Barnes:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

Pursuant to Section 6002 of SAFETEA-LU, as amended by Section 1304 of the Fixing America's Surface Transportation (FAST) Act, participating agencies are responsible for identifying, as early as possible, any issues of concern regarding the project's potential environmental, social, or economic impacts. Section 6002 is intended to assure that agencies are fully engaged in the scoping of the project and the decisions regarding alternatives to be evaluated in detail in the NEPA analysis. In accordance with the SAFETEA-LU Section 6002, FHWA is in the process of identifying local, state, and federal agencies that may have an interest in the project.

The FHWA and SCDOT would like to take this opportunity to formally invite your agency to become a participating agency in the development of the EA. Areas of concern to be emphasized in the EA will include potential environmental impacts upon existing ecological resources, wetlands, water resources, historic and archaeological resources, parks and recreation facilities, noise and air, social and community character, hazardous/contaminated materials, cumulative and indirect impacts, and potential impacts due to project construction. **Along with requesting your**

agency's participation as a Participating Agency, FHWA is also asking for any comments you may have on the Draft Purpose and Need statement, which is to "Improve Capacity and Reduce Congestion Along the U.S. 278 Corridor" and Draft Agency Coordination Plan (enclosure).

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- Has no jurisdiction or authority with respect to the project;
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If you have any questions or would like to discuss in more detail the project or each agency's respective roles and responsibilities during the preparation of the EA, please contact Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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

In Reply Refer To:
HDA-SC

Ms. Corain Lowe-Zepeda
Tribal Historic Preservation Officer
Muscogee (Creek) Nation of OK
1008 East Eufaula Street
Okmulgee, OK 74447

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Ms. Lowe-Zepeda:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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Sincerely,



Emily O. Lawton
Division Administrator

Enclosures

ec: Ms. LeeAnne Wendt, Muscogee (Creek) Nation
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



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

South Carolina

March 25, 2019

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 State Historic Preservation Officer
SC Department of Archives and History
8301 Parklane Road
Columbia, SC 29223

Subject: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor
Improvements Project in Beaufort County, South Carolina;
Federal Project Number P030450

Dear Ms. Johnson:

The Federal Highway Administration (FHWA), in cooperation with the South Carolina Department of Transportation (SCDOT), is preparing an Environmental Assessment (EA) for the US 278 Corridor Improvements Project. The proposed project would make improvements to the US 278 corridor between Bluffton and Hilton Head Islands. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is structurally deficient and is scheduled to be replaced. Access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well (see attached study area map). A website for the project has been established and can be viewed at <https://www.scdot278corridor.com>.

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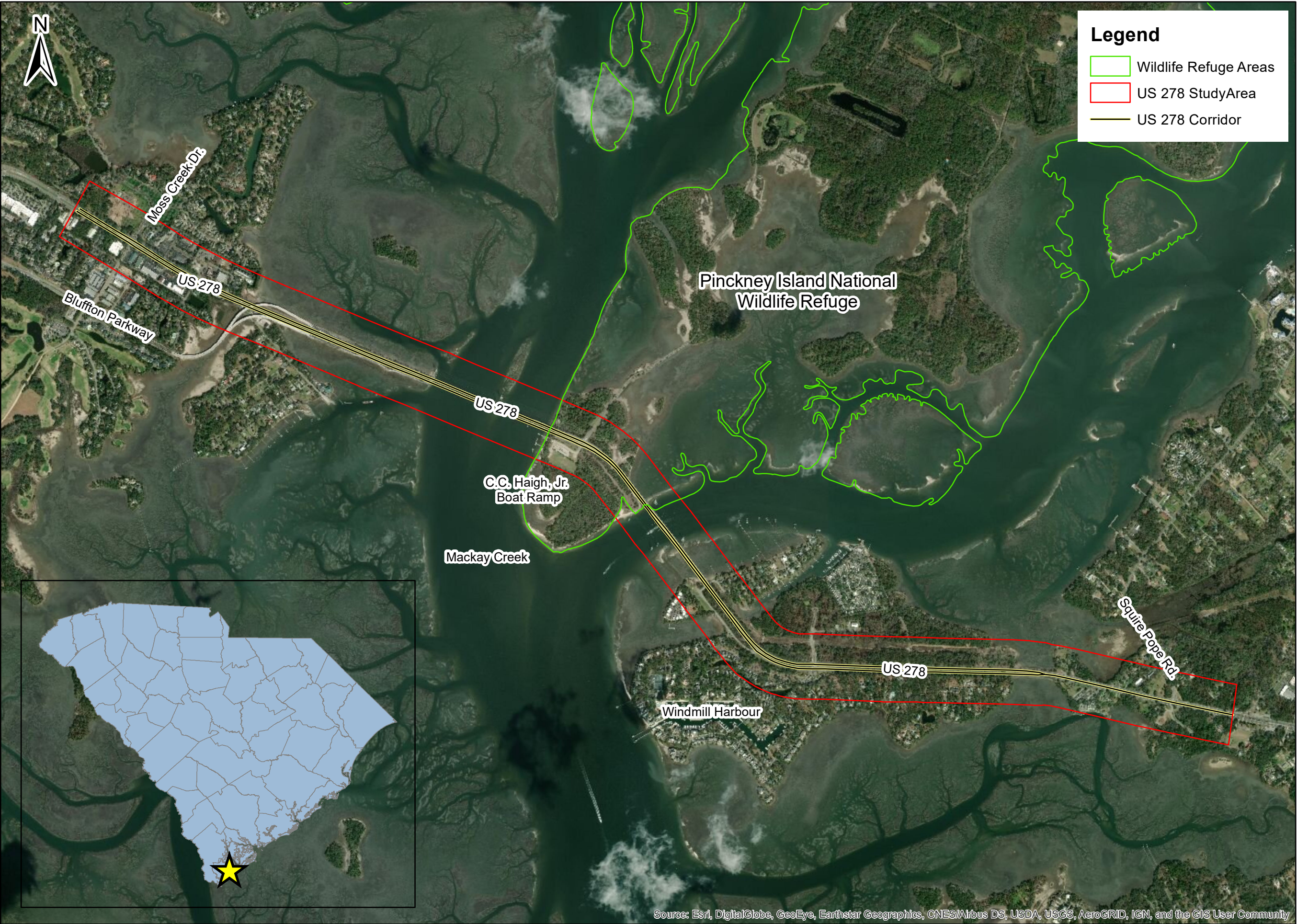
Sincerely,



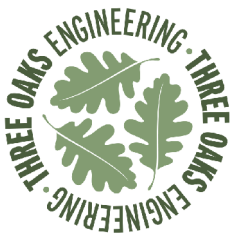
Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Joe Wilkinson, SCDAAH Transportation Liaison
Mr. Chad Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Prepared For:



**US 278
Corridor
Improvements
Project**

Beaufort County, SC

**Project Location
Map**

Date: August 2018

Scale:
1 in = 1,512 feet

Job No.: 18-002

Drawn By:
SMM

Checked By:
HMR

Figure

1



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

11 April 2019

Regulatory Division

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

Re: US 278 Corridor Improvements Project Cooperating Agency Acceptance, Beaufort
County, South Carolina, Federal Project Number P030450

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 Assessment (EA) for the US 278 Corridor Improvements Project between Bluffton and Hilton Head Islands, in Beaufort 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 EA 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 EA 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, Ivan W. Fannin at Ivan.W.Fannin@usace.army.mil or 843-329-8134.

Respectfully,



Digitally signed by
HUGHES, TRAVIS, G.1229867748
Date: 2019.04.18 14:51:03
-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

**U.S. Department of
Homeland Security**

**United States
Coast Guard**



Commander
United States Coast Guard
Seventh District

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

16475/1108/1110
April 10, 2019

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

Dear Division Administrator,

This letter is in response to your letter dated March 25, 2019 requesting the Coast Guard participate as a cooperating agency for the preparation of an Environmental Assessment (EA) for the proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina. I, as the Coast Guard Seventh District Bridge Branch representative, acknowledge receipt of and accept the invitation to be a cooperating agency for this project.

The Coast Guard will be a cooperating agency on the US 278 Corridor Improvements Project in accordance with 40 CFR 1501.6 and as such provide comments concerning construction or modification of bridges over navigable waterways of the United States that fall within the project corridor.

We have also reviewed and concur with the project Purpose and Need statement and the Draft Agency Coordination Plan which were included in your March 25, 2019 letter. We have no additional comments at this time. Thank you for the opportunity to participate as a cooperating agency for this infrastructure improvement project.

If you have any questions or concerns please contact me at (305) 415-6736 or email 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



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Savannah Coastal Refuges Complex
694 Beech Hill Lane
Hardeeville, SC 29927
Phone: 843-784-9911



April 22, 2019

Emily Lawton
Federal Highways Administration
1835 Assembly Street, Suite 1270
Columbia, South Carolina 29201

Re: Formal Request to Participate as a Participating Agency on the Preparation of an Environmental Assessment (EA) for the Proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina; Federal Project Number P030450

Dear Ms. Lawton,

The U.S. Fish and Wildlife Service (Service), after further consideration, formally requests to participate as a Cooperating Agency instead of a Participating Agency in the development of the Environmental Assessment (EA) for the proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina. The proposed project has the potential to affect the Pinckney Island National Wildlife Refuge, and/or Federal trust resources, including migratory birds, threatened and endangered species, cultural resources, interjurisdictional fish, certain marine mammals, and at-risk species. The Service is identified correctly as a Cooperating Agency on page 5 of the Draft Agency Coordination Plan.

Regulations implementing the procedural provisions of the National Environmental Policy Act of 1969 (NEPA), call for agency cooperation in the NEPA process with the ultimate goal of "...decisions that are based on understanding of environmental consequences, and ... actions that protect, restore, and enhance the environment" [40 CFR §1500.1(c)]. The regulations specifically define a cooperating agency as "...any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment" (40 CFR §1508.5).

As a Cooperating Agency, the Service will coordinate with the Federal Highways Administration throughout the EA planning process in order to ensure that pertinent Service mission statements, legislative authorities, policies, and concerns are duly considered during the development and analysis of any alternatives, related management actions, mitigation alternatives or actions, or

any other options that could affect Pinckney Island National Wildlife Refuge. The Service's Cooperating Agency status and level of involvement would not preclude our independent review and comment responsibilities under Section 102(2)(C) of NEPA. Similarly, being a Cooperating Agency would not imply that the Service would necessarily concur with all aspects of the Federal Highway Administrations' findings.

The Service appreciates the opportunity to provide these comments in this phase of the NEPA process. We have no further comments on the draft Agency coordination plan or draft purpose and need statement. If you need further clarification regarding these comments, please contact Mr. Russ Webb at (843) 784-9911 or Mr. Chuck Hayes at (843) 784-6262.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Gaboriault". The signature is fluid and cursive, with the first name "Holly" and last name "Gaboriault" clearly distinguishable.

Holly Gaboriault
Complex Project Leader

From: [Belcher, Jeffrey \(FHWA\)](#)
To: [Kelly, David P. \(KellyDP@scdot.org\)](#)
Cc: [Winn, Craig L.](#); [Heather Robbins](#)
Subject: FW: Participating Agency - US278 Corridor Improvement Project
Date: Monday, May 6, 2019 1:52:53 PM

Participating agency acceptance from EPA. No letter, so please save the e-mail to your official project file.

Thanks,

J. Shane Belcher
Environmental Coordinator
Federal Highway Administration
1835 Assembly Street, Suite 1270
Columbia, SC 29201
Phone: 803-253-3187
Fax: 803-253-3989

From: Herrell, Michelle (FHWA)
Sent: Monday, May 06, 2019 1:46 PM
To: Belcher, Jeffrey (FHWA) <Jeffrey.Belcher@dot.gov>
Subject: FW: Participating Agency - US278 Corridor Improvement Project

From: Singh-White, Alya [<mailto:Singh-White.Alya@epa.gov>]
Sent: Monday, May 06, 2019 1:41 PM
To: Herrell, Michelle (FHWA) <michelle.herrell@dot.gov>
Cc: Militscher, Chris <Militscher.Chris@epa.gov>
Subject: Participating Agency - US278 Corridor Improvement Project

Dear Michelle,

It is understood that SCDOT, in conjunction with FHWA, is in the process of developing an EA for the proposed US278 Corridor Improvement Project in Beaufort County, SC. The EPA is willing to be a participating agency on this project. I look forward to working with you moving forward.

Sincerely,

Alya Singh-White
Life Scientist / Biologist
National Environmental Policy Act (NEPA) Section
Strategic Programs Office
U.S. Environmental Protection Agency | Region 4
61 Forsyth St SW
Atlanta, GA 30303
(404)-562-9339 | singh-white.alya@epa.gov





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>

04/24/2019

F:SER/NS

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

Attention: Shane Belcher

Dear Ms. Lawton:

NOAA's National Marine Fisheries Service (NMFS) has received your letter dated March 25, 2019, requesting our participation as a participating agency on the US 278 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 US 278 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 (843) 460-9922, or by e-mail at 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. 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.

Sincerely,

STRELCHECK.AND
REW.J.1365863152
Digitally signed by
STRELCHECK.ANDREW.J.1365
863152
Date: 2019.04.24 10:44:57 -04'00'

for

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, Engleby

F/SER45, Wilber, Cooksey

OPR PR1, Daly

Files





April 3, 2019

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

Re: **Invitation to Become a Participating Agency for the Preparation of an Environmental Assessment (EA) for the Proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina; Federal Project Number P030450; (SHPO Project No. 18-EJ0110)**

Dear Ms. Lawton:

Thank you for your letter of March 25, which we received on April 2, regarding the invitation to become a participating agency for the preparation of an Environmental Assessment (EA) for the proposed US 278 Corridor Improvements Project. We also received the Draft Agency Coordination Plan, and the illustration of the US 278 corridor improvements study area.

We accept the invitation to become a participating agency during the preparation of the Environmental Assessment for the above referenced project. Our agencies responsibility will be to review compliance with section 106 of the National Historic Preservation Act, as codified at 36 CFR 800.2(c), and provide federal agencies with advise and assistance to ensure historic properties are taken into consideration at all levels of planning and development.

With regard to the request for comments for the Draft Purpose and Need statement, we have no expertise with which to offer comments regarding the purpose and need. Regarding the Draft Agency Coordination Plan, we also have no comments to add at this time.

For future coordination with our office regarding this project, we request that I, Joseph Wilkinson, be considered the primary contact.

If you have any questions about our participation, please contact me at (803) 896-6184, or by email at jwilkinson@scdah.sc.gov.

Sincerely,

Joseph E. Wilkinson
Review Coordinator for Transportation Projects
State Historic Preservation Office

cc. Mr. J. Shane Belcher, FHWA



RECEIVED
Federal Highway Administration

JUN 12 2019

Division Office
Columbia S.C.

June 05, 2019

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

Re: Invitation to Become a Participating Agency for the Preparation of an Environmental Assessment (EA) for the Proposed U.S. 278 Corridor Improvements Project in Beaufort County, South Carolina; Federal Project Number P030450

Dear Ms. Lawton:

The South Carolina Department of Health and Environmental Control (DHEC) is in receipt of your invitation to become a participating agency for the preparation of an Environmental Assessment for the U.S. 278 Corridor Improvements Project. The proposed project would make improvements to the U.S. 278 corridor between Bluffton and Hilton Head Island. The purpose of the proposed project is to increase capacity and reduce congestion along the U.S. 278 corridor from Moss Creek Drive to Squire Pope Road. The eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, is stated to be structurally deficient and is scheduled to be replaced. In addition, access to Pickney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would be improved as well.

DHEC accepts the invitation to become involved in the proposed project as a participating agency and agrees to the suggested roles as related to the agency's area of expertise including:

1. Participating in coordination meetings as appropriate
2. Consulting on any relevant technical studies that may be required for the project
3. Providing timely reviews and comments on the environmental document to reflect the views and concerns of our agency on the adequacy of the document, alternative considered, and the anticipated impacts and mitigation

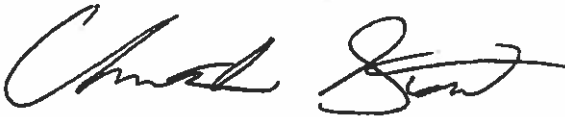
DHEC anticipates involvement of staff from the Water Quality Certification and Wetland Section within the Bureau of Water and staff from DHEC's Office of Ocean and Coastal Resource Management's Coastal Zone Consistency Certification Section and Critical Area Permitting Section. Chuck Hightower will be the point of contact for the Water Quality Certification and Wetland Section (803-898-0369; hightocw@dhec.sc.gov); Chris Stout will be the point of contact for the Coastal Zone Consistency Section (843-953-0691; stoutcm@dhec.sc.gov), and Blair Williams will be the point of contact for the Critical Area Permitting Section (843-953-0232; williabn@dhec.sc.gov).

DHEC looks forward to working with the U.S. Department of Transportation Federal Highway Administration and the other involved participating agencies.

Sincerely,



Chuck Hightower, Manager
Water Quality Certification and Wetland Section
Bureau of Water



Chris Stout, Manager
Coastal Zone Consistency Section
Ocean and Coastal Resource Management



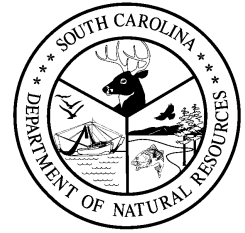
Blair Williams, Manager
Critical Area Permitting Section
Ocean and Coastal Resource Management

Enclosures

cc: Mr. J. Shane Belcher, USFHA Environmental Coordinator
Mr. Chang Long, SCDOT Environmental Division Manager
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Will McGoldrick, SCOT Design-Build NEPA/Permitting Coordinator
Ms. Joy Riley, SCDOT Program Manager

South Carolina Department of Natural Resources

PO Box 12559
Charleston, SC 29422
843.953.9003 Office
843.953.9399 Fax
Daviss@dnr.sc.gov



Alvin A. Taylor
Director
Lorianne Riffin
Director, Office of
Environmental Programs

April 10, 2019

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

RE: Invitation to Become a Participating Agency for the Preparation of an
Environmental Assessment (EA) for the Proposed US 278 Corridor Improvements Project, Beaufort
County, SC; Federal Project Number P030450

Dear Mr. Belcher:

Thank you for your invitation to become a participating agency in the preparation of an EA for the proposed US 278 Corridor Improvements Project by the Federal Highway Administration (FHWA) in cooperation with the South Carolina Department of Transportation (SCDOT). The purpose of this project is to increase capacity and reduce congestion along US 278 from Moss Creek Drive to Squire Pope Road. As a part of the corridor improvements project, the eastbound Mackay Creek Bridge, which crosses the Intracoastal Waterway, would be replaced as a part of SCDOT's bridge replacement program and the remaining three bridges in the study area would also be studied for potential improvements. In addition, the access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would also be studied for possible improvements.

As a participating agency, the South Carolina Department of Natural Resources (SCDNR) will identify, as early as possible, any issues of concern regarding the project's potential environmental impacts. We understand that participating agencies may also be involved in the issue resolution process and provide meaningful and timely input on unresolved issues. In a letter dated September 20, 2018, the DNR has already provided scoping comments on this project, including preliminary comments on potential impacts to natural resources in the study area (see attached).

The FHWA is also requesting comments on the Draft Purpose and Need Statement and the Draft Agency Coordination Plan provided for this project. We understand per the Draft Agency Coordination Plan (DACP) that DNR will be included as a participating agency in the review of this project and that we will be involved in the review and comment of the EA as well as the issue resolution process. As a state, non-regulatory agency, we would ask that the DNR's role in dispute resolution be clarified in the Final ACP. We have no comments or concerns regarding the Draft Purpose and Need Statement.

The SCDNR accepts the invitation to become a participating agency on the US 278 Corridor Improvements Project and looks forward to working with the FHWA and SCDOT in the development of the EA. The project leader for SCDNR on this project will be Susan Davis. Susan can be reached by email at daviss@dnr.sc.gov or via phone at 843-953-9003.

Thank you for 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 rigginl@dnr.sc.gov or by phone at 803-734-4199.

Sincerely,

A handwritten signature in cursive script that reads "Lorianne Riggin".

Lorianne Riggin

Director, Office of Environmental Programs

cc: SCDOT, Chad Long & David Kelly

From: [Belcher, Jeffrey \(FHWA\)](#)
To: [Kelly, David P. \(KellyDP@scdot.org\)](#); [Herrell, Michelle \(FHWA\)](#)
Cc: [Heather Robbins](#)
Subject: FW: Consulting Party for I-526 West and US 278
Date: Monday, May 6, 2019 7:18:35 AM

For your files. Since the Catawba Indian Nation did not provide a letter please keep this e-mail for your official record for both projects.

Thanks,

J. Shane Belcher

Environmental Coordinator

Federal Highway Administration

1835 Assembly Street, Suite 1270

Columbia, SC 29201

Phone: 803-253-3187

Fax: 803-253-3989

From: Caitlin Rogers [mailto:caitlinh@ccppcrafts.com]

Sent: Friday, May 03, 2019 2:35 PM

To: Belcher, Jeffrey (FHWA) <Jeffrey.Belcher@dot.gov>

Subject: Consulting Party

Mr. Belcher,

The Catawba wish to be a consulting party for the Proposed I-526 West Lowcountry Corridor Improvements and the Proposed US 278 Corridor Improvements. If you need anything else from us let me know. Thanks

Caitlin

--

Caitlin Rogers

Catawba Indian Nation

Tribal Historic Preservation Office

1536 Tom Steven Road

Rock Hill, SC 29730

803-328-2427 ext. 226

Caitlinh@ccppcrafts.com

Please Note: We CANNOT accept Section 106 forms via e-mail, unless requested. Please send us hard copies. Thank you for your understanding

From: [Kelly, David P.](#)
To: [Heather Robbins](#)
Cc: [Belcher, Jeffery - FHWA](#)
Subject: FW: US 278 Agency Coordination Plan Version 3
Date: Monday, June 17, 2019 3:35:04 PM

FYI

From: Section106 [mailto:Section106@mcn-nsn.gov]
Sent: Monday, June 17, 2019 3:20 PM
To: Kelly, David P.
Subject: RE: US 278 Agency Coordination Plan Version 3

*** This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source. ***

Mr. Kelly,

Thank you for sending the US 278 Agency Coordination Plan to the Muscogee (Creek) Nation. We look forward to receiving the CRS reports, once they are completed, for this project. Also, please keep us apprised of any additional updates.

Regards,
LeeAnne Wendt

LeeAnne Wendt, M.A., RPA
Historic and Cultural Preservation Department, Tribal Archaeologist
Muscogee (Creek) Nation
P.O. Box 580 / Okmulgee, OK 74447
T 918.732.7852
F 918.758.0649
lwendt@MCN-nsn.gov
<http://www.muscogeenation-nsn.gov/>

From: Kelly, David P. [mailto:KellyDP@scdot.org]
Sent: Thursday, June 13, 2019 7:55 AM
To: Belcher, Jeffery - FHWA; Boos, Laura M CIV USARMY CESAC (US) (Laura.M.Boos@usace.army.mil); Chuck Hightower (hightocw@dhec.sc.gov); Daniel, Tom (DanielT@dnr.sc.gov); Elizabeth Johnson (ejohnson@scdah.sc.gov); giffinma@dhec.sc.gov; Ivan Fannin; jwilkinson@scdah.sc.gov; Josh Hoke; MixonG@dnr.sc.gov; Singh-White, Alya; stout, christpoher (stoutcm@dhec.sc.gov); Susan Davis; Brumagin, Stephen A (Steve) CIV USARMY CESAC (USA); Mark Caldwell; noaa.nepa@noaa.gov; Williabn@dhec.sc.gov; noah.silverman@noaa.gov; Heath, Amanda L CIV USARMY CESAC (USA); cynthia.cooksey@noaa.gov; Winn, Craig L.; Groves, Megan E.; kelly.shotts@noaa.gov; Belcher, Jeffery - FHWA; Herrell, Michelle; TaylorA@dnr.sc.gov; RigglinL@dnr.sc.gov; RMcftee@bcgov.net; LeeAnne Wendt; Corain Lowe; Caitlinh@ccppcrafts.com; 'wenonahh@ccppcrafts.com'; Pace.Wilber@noaa.gov; Roy.Crabtree@noaa.gov; Cynthia.Cooksey@noaa.gov; Laycock.Kelly@eps.gov; Militscher.Chris@epa.gov; Russell.webb@fws.gov; Holly_T_Gaboriault@fws.gov; Thomas_Mccoy@fws.gov; Barry.Dragon@uscg.mil; Overton, Randall D CIV (Randall.D.Overton@uscg.mil); Bbarnes@estoo.net
Cc: Phil Leazer (phil.leazer@kci.com); Eric Burgess (Eric.Burgess@kci.com); 'livingstonal@cdmsmith.com'; Heather Robbins (heather.robbs@threeoaksengineering.com); Russell

Chandler (russell.chandler@threeoaksengineering.com); Geni Theriot
(geni.theriot@threeoaksengineering.com); Abdelaziz, Hisham K. (abdelazizhk@cdmsmith.com)
(abdelazizhk@cdmsmith.com); Beckham, Chris; humphreysjh@cdmsmith.com
Subject: US 278 Agency Coordination Plan Version 3

All—

The most recent iteration of the US 278 Agency Coordination Plan is attached. Please let me know if you have questions or comments.

David P. Kelly

South Carolina Department of Transportation
RPG 1 NEPA Coordinator/Statewide Architectural Historian
(803) 737-1645
Fax: (803) 737-1394



**COUNTY COUNCIL OF BEAUFORT COUNTY
ENGINEERING DEPARTMENT**

2266 Boundary Street, Beaufort, South Carolina 29902
Post Office Drawer 1228, Beaufort, South Carolina 29901-1228
Telephone: 843-255-2700 Facsimile: 843-255-9420
Website: www.bcgov.net

US Department of Transportation
Federal Highway Administration
1835 Assembly St., Suite 1270
Columbia, SC 29201

Subject: Accepting Participation Invitation for the Preparation of an Environmental Assessment (EA) for the Proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina; Federal Project Number P030450

Dear Ms. Lawton,

Beaufort County Engineering Division would like to accept participation in the Preparation of an Environmental Assessment (EA) for the Proposed US 278 Corridor Improvements Project in Beaufort County, South Carolina; Federal Project Number P030450 in the capacity as it pertains to:

- Participation and coordination of meetings as appropriate
- Consultation on any relevant technical studies that may be required for the project
- Timely review and comment on the environment document, alternatives considered, and the anticipated impacts and mitigation.

Please let us know if we need to provide anything further.

Thank you,

Robert McFee, PE
Division Director Construction, Engineering and Facilities
Beaufort County



Appendix B

ACE Meeting Summaries



ACE Meeting Notes – February 14, 2019

Attendees:

FHWA	Shane Belcher Michelle Herrell
USACE	Laura Boos Steve Brumagin Ivan Fannin Amanda Heath (on phone) Christopher Mims
USEPA	Ailya Singh-White (on phone)
USFWS	Mark Caldwell (on phone) Russ Webb (on phone)
SCDHEC	Chuck Hightower Logan Ress Tyler West
SCDNR	Tom Daniel (on phone) Susan Davis (on phone) Greg Mixon
SCDOT	Chris Beckham Sean Connolly David Kelly Jessica Kennedy Vince McCarron Mickey Queen
SHPO	Joe Wilkerson (on phone)
CDM Smith	Jenny Humphreys
KCI	Eric Burgess
Three Oaks Engineering	Russell Chandler Heather Robbins

Purpose of the Meeting:

Purpose was to initiate project scoping with the resource and regulatory agencies.

Project Summary:

The South Carolina Department of Transportation (SCDOT), in cooperation with the Federal Highway Administration (FHWA) and Beaufort County is proposing to make improvements to the US Highway 278 (US 278) corridor between Bluffton and Hilton Head Island. On November 6, 2018, the residents of



Beaufort County voted to increase their local option sales tax by an additional one-percent to support various proposed infrastructure projects, including the US 278 Corridor Improvements project. These dollars generated locally by this new sales tax will be combined with other state and federal transportation funds to fully fund this project.

The purpose of this project is to increase capacity and reduce congestion along US 278 from Moss Creek Drive to Squire Pope Road.

Additional studies from Squire Pope Road to the Cross Island Parkway will be conducted to identify improvements needed between these two roadways. As a part of the corridor improvements project, the eastbound Mackay Creek Bridge (traveling onto Hilton Head Island), which crosses the Intracoastal Waterway, would be replaced as a part of SCDOT's bridge replacement program. Meanwhile, the remaining three bridges in the study area—one westbound bridge (away from Hilton Head Island) over Mackay Creek and the two bridges over Skull Creek—would also be studied for potential improvements. In addition, the access to Pinckney Island National Wildlife Refuge and the C.C. Haigh, Jr. boat ramp would also be studied for possible improvements.

NEPA Procedures:

SCDOT will move this important project forward through the planning phase with an environmental assessment (EA), with the eventual goal of acquiring right-of-way and construction. The EA will follow FHWA's procedures under SAFETEA-LU 6002, as amended by Section 1304 of the FAST Act. This process is being followed in case the project gets elevated to an Environmental Impact Statement (EIS). 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.

No Alternatives have been established yet. The Project Team is looking for agency input on environmental review factors to be incorporated into alternatives analysis.

Agency Coordination Plan:

Cooperating: USACE, USFWS, USCG

Participating: EPA, NOAA, NMFS, DHEC, DNR, SCPR, Native American Tribes

Draft Plan will be distributed to agencies for review and comment

FHWA will send out Cooperating and Participating Agency Letters

Public Involvement:

<https://www.scdot278corridor.com/>

Stakeholder Identification

2018 tax referendum in Beaufort County

Heavy in-person engagement with stakeholders

Environmental Justice areas identified – Gullah communities, local and cultural community



Draft Schedule:

Ambient Noise measurements have been conducted
 ACE meeting Summer 2019 – Range of Alternatives
 Final NEPA Decision in Winter 2020

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>February 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 2019
Agencies review draft Purpose and Need Statement & Agency Coordination Plan	April-May 2019
Coordination Point for Agency Coordination Plan and Purpose and Need Statement	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
Coordination Point for Preliminary Range of Alternatives/Alternatives Carried Forward by Agencies	Fall 2019
Public Information Meeting	Fall 2019
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall-Winter 2019
2020	
<i>Agency Meeting to discuss Reasonable Alternatives and Preferred Alternative</i>	<i>Spring 2020</i>
Agency Meeting and Coordination Point for Preferred Alternative by Agencies	Spring 2020
Submit Preliminary Jurisdictional Determination to USACE & Critical Area to SCDHEC-OCRM	Summer 2020
Pre-Application Meeting with USACE and SCDHEC	Summer/Fall 2020
Draft EA issued; Joint USACE Individual Permit and USCG Public Notices	Fall 2020
Public Hearing	Fall/Winter 2020
2021	
Prepare Final NEPA Decision	Early 2021
FHWA Issues Final NEPA Decision	Early 2021
USACE and USCG Issue Permit Decisions	Early 2021



Agency Input:

Conceptual Mitigation approach – use of Clydesdale Mitigation Bank or other approved banks

- USFWS and DNR will object if use Clydesdale
- USFWS and DNR requested that we review Onsite options for Restoration/Conversion

C.C. Haigh Jr. Boat ramp is located on the south side of US 278

- Located on USFWS Pinckney Island National Wildlife Refuge
- Owned by USFWS and operated by Beaufort County. This was confirmed after the ACE Meeting by USFWS.

SCDHEC confirmed that the project area is within Approved Shellfish Harvesting Waters

- Shellfish harvesting waters standards for bridge drainage design should be reviewed and incorporated into proposed bridge plans

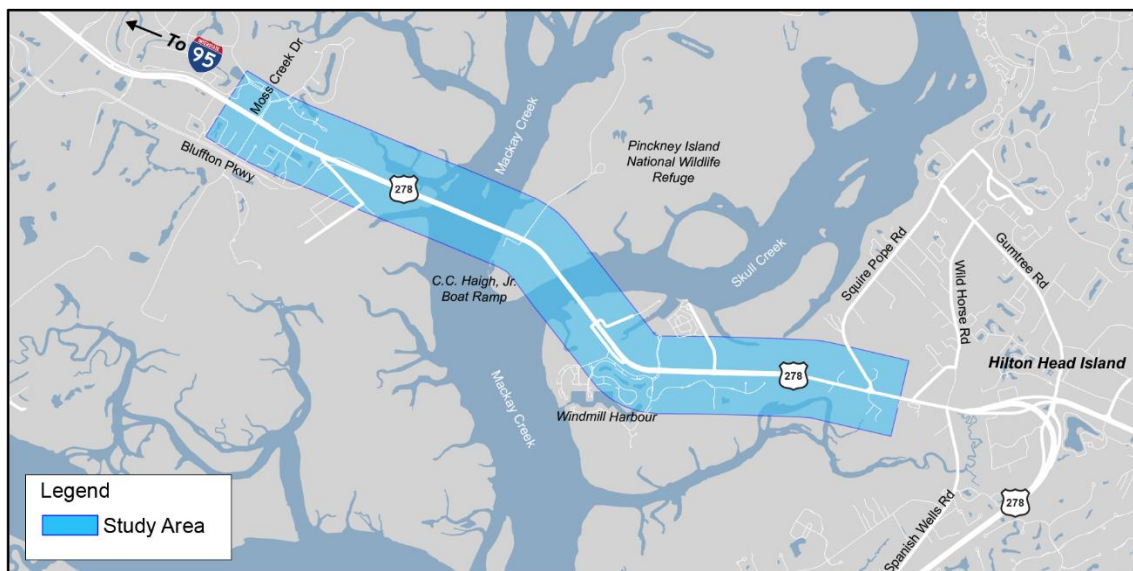
FHWA will request that USEPA Review EJ and Community Impact Assessment

Next Steps:

Draft Agency Coordination Plan will be distributed to agencies for review and comment

FHWA will send out Cooperating and Participating Agency Letters

Preliminary Alternatives Development





ACE Meeting Notes – June 13, 2019

Attendees:

FHWA	Shane Belcher
NOAA	Cindy Cooksey (on phone)
USACE	Laura Boos Steve Brumagin Ivan Fannin
USEPA	
USFWS	Mark Caldwell (on phone) Russ Webb (on phone)
SCDAH	Elizabeth Johnson (on phone)
SCDHEC	Chuck Hightower
SCDHEC-OCRM	Josh Hoke (on phone) Chris Stout (on phone)
SCDNR	Tom Daniel Susan Davis (on phone) Greg Mixon
SCDOT	Chris Beckham Sean Connolly Siobhan Gordon Henry Phillips (on phone) Craig Winn
KCI	Phil Leazer
Three Oaks Engineering	Russell Chandler Heather Robbins Geni Theriot

Purpose of the Meeting:

Purpose was to present and discuss the alternative evaluation criteria, range of alternatives, and provide a coordination point for agencies as required by the 6002 EA process.

Change in project termini, has now extended from Squire Pope Road to Spanish Wells Road.

The intersection at Spanish Wells Road has already been improved which will allow for more logical tie-in to occur without additional intersection improvements. Traffic studies already extended to Spanish Wells Road. The change in termini was determined through coordination with SCDOT and FHWA.



Preliminary Alternative Evaluation Criteria:

The alternative evaluation criteria and the range of Alternatives is a coordination point for agencies. Preliminary range of alternatives was developed based on public comments from the September 2018 Public Meeting and additional stakeholder input. Some of the alternatives do not tie in at Spanish Wells Road but at other termini.

Purpose and Need is to address deficiency at Mackay Creek as well as increase capacity and reduce congestion.

TSM/TDM and Mass Transit will be considered as standalone but can be incorporated into the alternatives if they cannot move forward on their own.

First level of evaluation criteria:

- Wetlands – GIS layer – NWI, soils, topo, DEM, existing JD on Jenkins Island
- Protected lands – USGS PADUS, National Conservation Easement Database
- ROW – number of impacted parcels/properties, total acres outside existing R/W
- Neighborhoods – how the individual parcels are grouped together and “self-identify” as groups

Analyze alternatives based on the above criteria. For August ACE meeting the team will be able to explain which alternatives will be kept and which ones will be eliminated based on the criteria. The team plans to



present Reasonable Alternatives to the public in the Fall of 2019 following agency coordination. Currently there are seventeen (17) preliminary alternatives.

Reasonable Alternative Evaluation Criteria:

NOAA-NMFS requested to add habitat areas of particular concern (oyster and shellfish habitat) to the second level of evaluation criteria. NOAA also asked about utility impacts. Project Team explained that exact impacts are currently unknown. There are overhead power lines on both sides of the existing bridges over Mackay Creek, a large water line that feeds all of Hilton Head Island, and other known utilities. Discussions and coordination with utility companies have been started. Utility impacts will be further evaluated under the reasonable range of alternatives.

USACE recommended including a discussion of the practicability of alternatives. Document all decisions thoroughly. Project is an EA but follows the SAFETEA-LU 6002 Process and could easily be elevated to EIS if required. As portions of the document are available, they will be shared with cooperating and participating agencies. USACE asked if the route was a hurricane evacuation route. Project Team explained that SCDOT will require four lanes of traffic be open at all times during construction.

USFWS requested to include compatibility with the Pinckney Island National Wildlife Refuge (NWR) as an evaluation criterion. Pinckney Island National Wildlife Refuge prefers any new alignments considered stay south of existing roadway. This would be compatible with their future plans for additional access and parking. USFWS stated that there are no records of T&E on Pinckney Island NWR. Compatibility with NWR plans will be added to reasonable criteria or preliminary criteria.

SCDAH had no comments or concerns at this time.

SCDOT asked why the P&N was not in preliminary evaluation criteria. It was assumed that all preliminary alternatives meet P&N. Traffic studies will be completed on reasonable alternatives and is component of P&N. Use driving environmental factors as first level of evaluation criteria such as wetlands, National Wildlife Refuge and Environmental Justice communities. The USFWS' archaeologist has been contacted, but the team has not received a reply. The team is aware that the Pinckney Island NWR archaeologist needs to be involved in discussions. Will bring this up during meeting scheduled with NWR staff on June 25th.

SCDHEC & SCDHEC-OCRM requested the team include restrictive covenants on properties as an evaluation criterion. Inclusion of shellfish harvesting waters. OCRM areas of concern include archaeology, geographic area of particular concern (GAPC), EJ, and critical area. Shellfish harvesting leaseholders need to be informed. OCRM and SCDNR typically handle this as part of the Public Notice process for Critical Area permits.



SCDNR asked about the proposed corridor width. Project Team explained that it is currently four lanes, but the preliminary traffic numbers show that it needs to be six lanes. Different typical sections will be reviewed to avoid and minimize impacts in the reasonable/preferred alternative selections. SCDNR asked if Only the alternatives with new alignments would extend to Cross Island Parkway. Any work on Cross Island Parkway would be limited to tie-ins for those alternatives. Cross Island Parkway does not provide access on or off the island and traffic diverges at the expressway.

Next Steps:

- The following items will be added to the 2nd Evaluation Criteria:
 - Habitat Areas of Particular Concern
 - Compatibility with USFWS Refuge
 - Restrictive Covenants
- Alternative Matrix to explain alternatives eliminated from proposed reasonable alternatives to proposed preferred alternatives. Plan to present at August 2019 ACE meeting.
- Mitigation needs assessment to be conducted once reasonable alternatives identified and agency concurrence point completed.



Draft Schedule:

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>February 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 25, 2019
Agencies review draft Purpose and Need Statement & Agency Coordination Plan	April-May 2019
Coordination Point for Agency Coordination Plan and Purpose and Need Statement	May 2019
<i>Agency Meeting to discuss the alternative evaluation criteria, alternatives analysis process, and Preliminary Range of Alternatives</i>	<i>June 13, 2019</i>
Agencies Review the Preliminary Range of Alternatives for Coordination	June/July 2019
Coordination Point for Preliminary Range of Alternatives/Alternatives Carried Forward by Agencies	Summer 2019
Public Information Meeting	Fall 2019
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall-Winter 2019
2020	
<i>Agency Meeting to discuss Reasonable Alternatives and Preferred Alternative</i>	<i>Spring 2020</i>
Agency Meeting and Coordination Point for Preferred Alternative by Agencies	Spring 2020
Submit Preliminary Jurisdictional Determination to USACE & Critical Area to SCDHEC-OCRM	Summer 2020
Pre-Application Meeting with USACE and SCDHEC	Summer/Fall 2020
Draft EA issued; Joint USACE Individual Permit and USCG Public Notices	Fall 2020
Public Hearing	Fall/Winter 2020
2021	
Prepare Final NEPA Decision	Early 2021
FHWA Issues Final NEPA Decision	Early 2021
USACE and USCG Issue Permit Decisions	Early 2021



ACE Meeting Notes – August 8, 2019

Attendees:

FHWA	Shane Belcher
NOAA	Cindy Cooksey (on phone)
USACE	Christopher Mims Ivan Fannin
USEPA	
USFWS	Megan Cook (on phone)
SCDAH	Joe Wilkinson
SCDHEC	Logan Ress (on phone) Chuck Hightower (on phone)
SCDHEC-OCRM	
SCDNR	Tom Daniels (on phone)
SLCOG	Kyle Kelly (on phone) Jake Whitmire
SCDOT	Sean Connolly Siobhan Gordon Micky Queen Vince McCarron Megan Groves David Kelly
KCI	Phil Leazer Eric Burgess
Three Oaks Engineering	Russell Chandler Heather Robbins Geni Theriot

Purpose of the Meeting:

Purpose was to present and discuss the full range of preliminary alternatives, the evaluation criteria and present the proposed reasonable alternatives. The evaluation criteria used to get from preliminary to reasonable alternatives was reviewed. These criteria include:

- Purpose & Need
 - Structural Deficiency



- GIS Wetlands
- Right-of-Way
- Neighborhoods
- Protected Lands
- Consistent with Pinckney Island National Wildlife Refuge (PINWR) purposes

The meeting continued with a brief explanation of the materials sent to the agencies and printed for those in attendance which included the alternatives matrix, the alternatives development flowchart, the project handout as well as a alternatives matrix summary developed and provided to those in the room. The matrix summary will be provided to those on the call with the meeting summary. Please note on the matrix summary document, the alternatives that are proposed to be eliminated are in grey.

Preliminary Range of Alternatives to Proposed Reasonable Alternatives

The Preliminary Range of Alternatives were discussed by using a KML (Google Earth) file for a visual representation of each alternative. Each alternative was outlined by the Preliminary Range of Alternatives Summary Sheet (attached) and any additional notes are recorded below.

Alternative 1:

- Reminder that the original purpose of the project was to replace the structurally deficient eastbound Mackay Creek bridge. The project has grown to include the full corridor between Moss Creek and Spanish Wells.
- If funding falls through, the eastbound Mackay Creek bridge will still be replaced.
- FHWA (Shane) noted one of the reasons access improvements at Pinckney Island are because SCDOT is trying to incorporate improvements for the access/egress issues on Pinckney Island. The County has a plan to apply for a grant to improve access to Pinckney Island and this is an opportunity to tie the two projects together and incorporate the long-range plans of the refuge.
- Beaufort County plans to submit for a FLAP grant to improve access to Pinckney Island.
- SCDOT (Sean) asked if the justification provided was enough to eliminate according to USACE and the other agencies in attendance.
- USACE (Chris) did indicate the provided justification was adequate.

Alternative 2:

- A reminder that USFWS has indicated they prefer the alternatives that remain close to existing alignment.
- No comments received during the discussion of this alternative.

Alternative 3a: No comments received during the discussion of this alternative.



Alternative 3b:

- This alternative was eliminated because it had a bigger footprint and the potential impacts were greater than 3a.
- SCDOT (Sean) states he thinks the elimination justification is pretty self-explanatory and asked if it was enough for eliminating for permit application?
- USACE (Chris) responded that it was hard to get too specific on each alternative right now because the level of review is still so broad.
- FHWA (Shane) Some of the bigger issues on the Spanish Wells end is the Environmental Justice impacts are bigger.
- SCDOT (Sean) asked if at this time if anyone saw any red flags in terms of process.
- USACE (Chris) agrees that based on what he sees now he does not see any red flags.
- SCDOT (Sean) stated he just wants to make sure everyone is comfortable with the justification for removing the ones we think are not practical.
- Three Oaks (Heather) reviewed the evaluation criteria again and pointed out the additional criteria that was added after the June ACE Meeting.
 - Consistency with PINWR Purposes was added to the Preliminary Alternatives Evaluation Criteria.
 - Shellfish Harvesting Waters and Essential Fish Habitat have been added to the Evaluation Criteria for the Reasonable Alternatives.
- SCDOT (Sean) asks that if there are things you were good with in June but you aren't anymore let us know.
- Three Oaks (Russell) asks USACE if they would like to see the Alternatives Matrix as a separate appendix to the permit document. The NEPA document is a standard appendix but the matrix could be a standalone appendix for ease of reference.
- USACE (Chris) responded that the NEPA document will discuss the elimination in detail and if they had questions, they could reference the matrix.
- SCDOT (Sean) asked USACE to make sure the chart had everything they need in it if they plan to use it for reference.

Three Oaks (Heather) specified we want everyone to agree on what is being carried forward, so we do want feedback.

Alternative 4a:

- Pinckney Island access is a little different in this alternative.
- It was also noted that there is a slightly different configuration by Windmill Harbor.
- No comments received during the discussion of this alternative.

Alternative 4b:

- This alternative tried to keep the existing boat ramp on Pinckney Island



- It was noted that USFWS expressed concern with getting farther away from existing alignment.
- No comments received during the discussion of this alternative.

Alternative 4c:

- USFWS concerns regarding future infrastructure maintenance and safety with this alternative being too far south.
- No comments received during the discussion of this alternative.

Alternative 4d:

- SCDOT (Sean) asks for clarification on the USFWS concerns in regards to infrastructure and financial responsibility.
- Three Oaks (Heather) explains that everything at grade will be the responsibility of USFWS to maintain in the future.
- SCDOT (Sean) asked if we had documentation of USFWS concerns for justification of elimination of these alternatives.
- Three Oaks (Heather) stated we had the concerns documented in the summaries from these meetings. The federal land transfer process was briefly discussed. USFWS also advised it would be easier to get a compatibility determination for the NEPA document the closer to existing alignment the project stays.

Alternative 4e: No comments received during the discussion of this alternative.

Alternative 4f:

- This alternative avoids Pinckney Island but eliminated because 4d improves Pinckney Island access.
- No comments received during the discussion of this alternative.

Alternative 5a:

- This alignment goes the farthest north of all alternatives.
- USFWS does not want Pinckney Island bisected to the north
- This alternative also has impacts to SCDNR's Victoria Bluff Heritage Preserve
- No comments received during the discussion of this alternative.

Alternative 5b:

- FHWA (Shane) pointed out that the reason we are looking at these off the wall alternatives is because SCDOT and the consultants were charged with looking at alternatives to address the county/town concerns.

Alternative 6a: No comments received during the discussion of this alternative.



Alternative 6b:

- The public wanted tie into the Bluffton Parkway
- No comments received during the discussion of this alternative.

Alternative 6c:

- The only change between 6b and 6c is that the curves were buttoned up a little more with this alternative.
- No comments received during the discussion of this alternative.

Alternative 6d: No comments received during the discussion of this alternative.

Alternative 6e: No comments received during the discussion of this alternative.

Alternative 7:

- This alternative is similar to Alternative 4a until it reaches Jenkins Island. The town wanted us to look at using the existing transmission line easement at the Jenkins Island tie in.
- Three Oaks (Heather) points out that if we move it there it avoids some of the Environmental Justice impacts and could tie into the proposed Jenkins Island improvements.
- NOAA (Cindy) asks where the transmission lines would go?
- Three Oaks (Heather) explains we need farther evaluation to determine if it will be eliminated or carried forward. Utilities are included in the next level of evaluation criteria and a detailed utilities and cost analysis will occur.

Alternative 8:

- This alternative still uses the transmission line but connects to the alignment of Alternative 4d.
- SCDOT (Sean) points out that 7 & 8 take from 4a & 4d until transmission lines. He asks if there is any way to tie back down before the hump?
- KCI (Eric) and Three Oaks (Heather) respond that this would cause greater impacts to the EJ communities.
- USACE (Ivan) asked if the owners of the marsh land have commented on this yet?
- Three Oaks (Heather) answered that they will see it at the PIM. Ivan explained that there was history here where these property owners have been told they couldn't touch this land because it is marsh and points out they may have an issue with being told a highway is now going to be built there.

General Discussion

- Three Oaks (Heather):
 - If we have agreement on reasonables we propose to rename them for the PIM so they are sequential (RA1-RA6).



- We will use the new names moving forward in all discussions.
- At the PIM we will show the spaghetti map and the 6 reasonable alternatives.
- We will plan to return in the spring of 2020 to walk through the detailed analysis and propose a preferred alternative.
- In the Spring of 2020, we will have more details on when PJD will be submitted to USACE.
- Draft EA is anticipated to be submitted in Fall of 2020.
- SCDOT (Sean) asks if USFWS expressed anything about purchasing additional land?
- Three Oaks (Heather) responded that this had not been mentioned in our discussions with them. They had mentioned future improvements such as a visitor's center and additional parking.
- FHWA (Shane) also confirmed no discussion of expansion had occurred.
- Sean asked USFWS (Megan) to confirm and she did through email.
- FHWA (Shane) states that USFWS is a cooperating agency. The compatibility determination for the NEPA document is needed for the Federal Land access program. The goal is to write the NEPA document to meet the needs of USFWS, USACE and USCG.
- USFWS (Megan) expressed some confusion on the final determination on if they were a participating or cooperating agency.
- FHWA (Shane) stated USFWS was confirmed as a cooperating agency by Holly. Megan will let Shane know if she needs any additional documentation.
- SCDOT (Sean) asked USACE if the update for the SOP for mitigation was complete?
- USACE (Chris) stated it was still going through QA/QC.
- SCDOT (Sean) asked if we anticipated impacts to be fill, shading or clearing?
- Three Oaks (Russell) answered that the impacts have not been quantified to that level at this time.
- SCDOT (Sean) asked USACE if they still had to wait on OCRM to bless the PJD before they could approve it?
- USACE (Chris) stated the process has been modified to allow the PJD to move forward without OCRM approval.
- Three Oaks (Russell) noted the plan was to submit the PJD with maps, then to a site visit followed by the generation of the plat.
- SCDNR will consider any impacts to SCDNR properties.
- SCDNR is checking to see if they have any properties they are interested in acquiring within the area
- SHPO will wait to see the report to determine what is present.



ACE Meeting Notes – March 12, 2020

Attendees:

FHWA	Shane Belcher
NOAA	Cindy Cooksey (on phone)
USACE	Christopher Mims (on phone) Steve Brumagin (on phone)
USEPA	Alya Singh-White (on phone)
USFWS	Mark Caldwell (on phone)
SCDAH	Joe Wilkinson
SCDHEC	
SCDHEC-OCRM (CZC)	Chris Stout (on phone)
SCDNR	Susan Davis
SCDOT	Craig Winn Chris Beckham David Ed Frierson Jackie Galloway Kelly
KCI	Phil Leazer
Three Oaks Engineering	Russell Chandler Heather Robbins Geni Theriot

Purpose of the Meeting:

Purpose was to present a project update, discuss the reasonable alternatives and revisions since the last agency meeting, discuss preliminary EFH assessment and future mitigation planning.

Old Business

Agencies were asked if they had any questions/concerns with Carolina Crossroad 404 (b) 1 responses progressing

USACE stated once final mitigation plan is received a 15-day review will occur.

No other questions/concerns were voiced.



US 278 Corridor Improvements

Alternatives Analysis

- Project recap/update was provided
- Agencies were provided the presentation seen today prior to the meeting
- In August we showed the reasonable alternatives, the project team is currently evaluating these alternatives and plan to have analysis complete by summer.
- 17 preliminary alternatives were developed originally and were narrowed down to 6 reasonable alternatives
- Public input led to revisions to the alternatives resulting in 9 reasonable alternatives
 - RA 4 modified to 4a with closer interchange to existing Pickney based on previous coordination with USFWS and coordination call with Waccamaw
 - RA 5 & 6 modified to pull off utility easement to minimize potential high costs of impacting utilities resulting in 5a and 6a
 - Hog Island Connector was added to all alternatives to facilitate more efficient ingress/egress during construction
- Preliminary impact calculations show RA 2, RA 3 and RA 4a are rising to the top. Impacts are still being evaluated so all 9 reasonable alternatives are still under analysis.
- NOAA-NMFS and USFWS expressed concern with the impacts expected from adding the Hog Island connector and expansion of project outside of existing right-of-way in this area.
- USFWS and NOAA-NMFS expressed concern with portions of the loop on Pinckney Island with proposed impacts to saltmarsh. NOAA needs justification for any proposed new causeway.
- Agencies asked if this loop over the saltmarsh could be a flyover but it was explained that due to elevations this was not constructible
- USFWS asked if existing US 278 could be used instead of the proposed loop concept was not constructible due to elevation constraints.

Essential Fish Habitat

NOAA-NMFS has no comments/questions and offers a site visit

Mitigation Needs Assessment

- Looking at existing landscape
- The range of credit needs was developed based on lowest level of impacts and highest level of impacts for all 9 reasonable alternatives
 - 23-62 freshwater credits
 - 203-396 tidal credits
- The agencies were asked if they knew of any on-site mitigation opportunities.
 - SCDNR does not have any on-site mitigation opportunities
 - SCDNR & USFWS expressed concern with the number of tidal credits



- SCDNR, NMFS, USFWS and USACE like onsite restoration
 - USACE reminds to avoid & minimize and does not consider removal of causeway as mitigation without including a restoration component
- SCDOT is not sure they would propose onsite mitigation for all of mitigation
- The mitigation needs assessment is a snapshot of where we are in the design concept, efforts to avoid an minimize will be incorporated into the preferred alternatives. At this stage, the #'s are representative of all 9 reasonable alternatives and include both permanent and temporary impacts.
 - Credit range is conservative and may get smaller as alternatives are refined.
- USACE states they see a benefit of PRM for this project versus wiping out the available credits
- During the May ACE meeting, we plan to provide the full matrix of impacts for review

Action Items

- Provide justification to NMFS and USFWS for the following
 - Hog Island Connector and why it isn't shifting south of utility easement vs the northern alignment the project team is currently proposing
 - Why the Hog Island Connector is part of the US 278 project
- Continue refining alternatives analysis matrix to define preferred alternative
- Begin investigation of potential mitigation opportunities within the project watershed



ACE Meeting Notes – May 14, 2020

Attendees:

FHWA	Shane Belcher
NOAA	
USACE	Christopher Mims Ivan Fannin Steve Brumagin
USEPA	Alya Singh-White Kelly Laycock
USFWS	Mark Caldwell
SCDAH	Elizabeth Johnson
SCDHEC	Eliza Thorne Rusty Wenerick Chuck Hightower
SCDHEC-OCRM	Josh Hoke
SCDNR	Susan Davis Stacie Crowe Greg Mixon
SCDOT	Craig Winn Chad Long Bill Jurgelski Chris Beckham Siobhan Gordon Mickey Queen David Kelly Sean Connolly Vince McCarron Henry Phillips Koty Brown Jessica Kennedy
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Amanda Chandler Russell Chandler Heather Robbins Geni Theriot



Purpose of the Meeting:

The purpose of the meeting is to provide a project update, discuss the alternatives matrix and the recommended preferred alternative for the US 278 Corridor Improvements Project.

US 278 Corridor Improvements

Russell Chandler with Three Oaks Engineering went through the presentation provided prior to the meeting and provided a summary of items discussed in the March ACE meeting.

As discussed in previous meetings, the team originally assessed 16 build alternatives. These preliminary alternatives were narrowed down to 6 reasonable. Based on public input the team revised the reasonable alternatives to include an interchange on Pinckney Island National Wildlife Refuge (PINWR) closer to the existing US 278, the addition of Hog Island connector, and a shift to avoid utilities. These revisions resulted in the addition of 3 alternatives; therefore, 9 reasonable alternatives were assessed.

Hog Island Connector Addition

- Residents of multiple communities have difficulty getting onto the US 278 corridor
- Also allows for traffic improvements, including improvements that eliminate left turn lanes
- Avoids utility impacts. If connector is shifted closer to US 278 there will be significant utility impacts which increases project costs by \$20-25 million

Reasonable Alternatives

- Used evaluation criteria previous discussed
- Each reasonable alternative meets the purpose and need
- Field verified data – delineated wetlands for all reasonable. Have not been approved by USACE or OCRM but provides more information than GIS data.
- 5, 5a, 6, 6a – wetland impacts increased for critical area impacts. Also noticed more ROW impacts particularly to EJ community.
- Reasonable alternative 4a stood out as better than the others for the following reasons:
 - Lowest total wetland impacts (18 acres)
 - Lowest impacts to tidal salt marsh/critical area wetlands (14 acres)
 - Benefits to PINWR
 - USFWS did not like how 4 tied into facility, so developed 4a which fit PINWR purposes better.
 - More consistent with PINWR purposes than the other alternatives
 - Seismic design standards – existing Mackay Creek and Skull Creek bridges do not meet current standards. Looked at this project to improve all structures and provide a lifeline to HHI. Alt 4a provides one contiguous structure over Mackay Creek and Skull Creek that meets seismic standards.



- Construction timeframe anticipated to be shorter due to being off the existing alignment.
- For these reasons, 4a is the recommended preferred alternative.

Conceptual Mitigation

- Updated the credit needs for the project to reflect Alternative 4a as the preferred alternative.
- Estimates do not include a distinction between temporary or permanent.
- Estimates shown are based on fill impacts and bridging Mackay Creek and Skull Creek.
- Existing Mitigation Bank availability for tidal salt marsh and some freshwater.
- There are still concerns about the credits being available when they are needed and concerns about wiping out banks which does not allow credits for future projects (SCDOT and others)
- Evaluating PRM sites and feasibility, costs
 - Particularity focusing on tidal salt marsh restoration
- Looking at minimization and avoidance opportunities for alternative 4a to reduce mitigation credit needs

Section 4(f)

- Potential 4(f) impacts to one (1) archaeological site
- Section 4(f) impacts to the existing boat landing facility on PINWR
 - Project plans to make improvements to the ramp
 - May require short term closure
 - Concerns with this due to access for emergency services
- Proposing a net-benefit Section 4(f) for impacts to the boat landing and PINWR and USFWS concurs
- USFWS previously requested leaving a portion of the old Mackay Creek bridge in place but no longer want to pursue that request

Pinckney Island Wildlife Refuge Archaeological Sites

- Site 38BU66 (in blue on presentation), to the south of existing US 278, is located on the southeastern side of PINWR.
 - The site follows the curve of the shoreline and recent surveys have expanded the original boundary. The dotted red line more accurately represents the site boundary.
 - Alternative 4a impacts this site.
 - Site not suited for preservation in place. A data recovery effort- is planned to excavate, preserve, and document the presence and characteristics of any buried features on the site. Coordination with USFWS needed to see if they agree with this plan.
 - Section 4(f) may also be required for this site
- Site 38BU67, to the north of existing US 278, is located on PINWR adjacent to Skull Creek. The preferred alternative will avoid this site.



Upcoming

- JD and CAP requests anticipated to be submitted in June/July
- Public Hearing tentative for Winter 2020

General Discussion

USACE (Ivan) – purchasing available mitigation credits is preferred. PRM offsite is least preferred; if PRM is pursued justification would be needed. Avoidance of wiping out a bank is not a significant enough justification.

- Two other PRM options, PRM watershed approach and PRM on-site/in-kind should be reviewed and prioritized before pursuing PRM off-site/out-of-kind
- SCDOT prefers mitigation banks to reduce risk and will evaluate mitigation banking opportunities closely before pursuing PRM
- SCDOT stated they need to include due diligence for other projects in the area that need to use the mitigation banks versus PRM and noted it is possible that the existing credits are purchased for other projects earlier than the needed purchase for this project which is the reason for investigating potential PRM.
- On-site PRM opportunities currently being investigated:
 - Nature Based solutions for Coastal Highway resiliency
 - Restoration of tidal flows through removal and restoration of existing causeways

Action Items

- Continue coordination with USFWS on archaeological sites and next steps
- Continue coordination with SCDOT on wetland mitigation options



Appendix C

USFWS PINWR Meeting Summaries



Early Coordination Meeting – Pinckney National Wildlife Refuge

March 4, 2019 at 11AM

USFWS Field Office

694 Beech Hill Lane, Hardeeville, SC

Attendees:

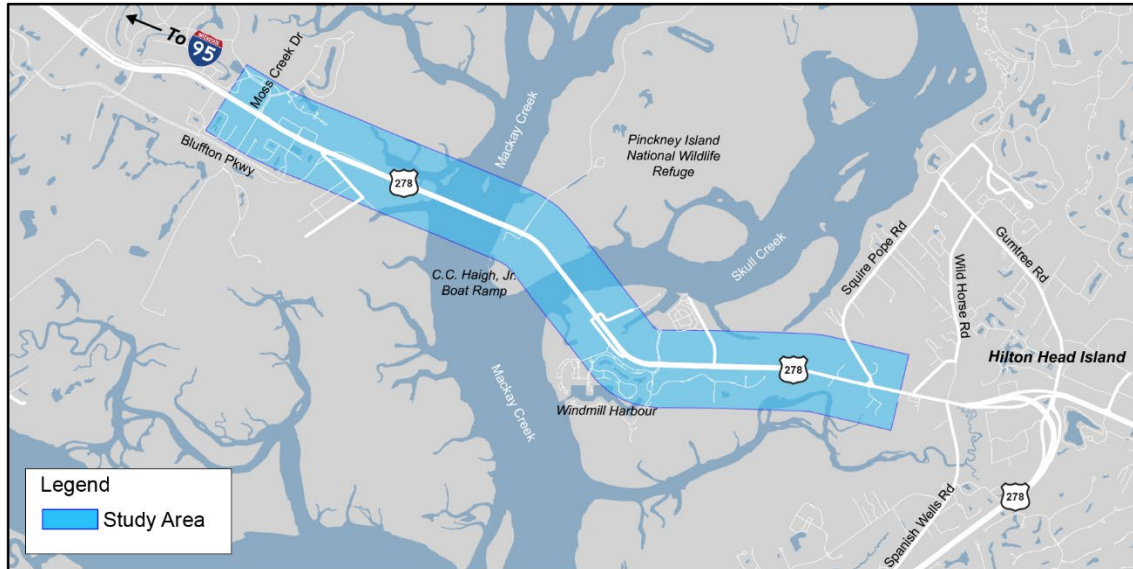
FHWA	Shane Belcher
USFWS	Mark Caldwell JoAnn Clark Christopher Cooley Shaw Davis Holly Gaboriault Russ Webb
SCDOT	David Kelly Megan Groves Craig Winn
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Russell Chandler Heather Robbins

Purpose of the Meeting:

Purpose was to initiate coordination with USFWS and the Pinckney National Wildlife Refuge.

Project Summary:

The South Carolina Department of Transportation (SCDOT), in cooperation with the Federal Highway Administration (FHWA) and Beaufort County is proposing to make improvements to the US Highway 278 (US 278) corridor between Bluffton and Hilton Head Island. On November 6, 2018, the residents of Beaufort County voted to increase their local option sales tax by an additional one-percent to support various proposed infrastructure projects, including the US 278 Corridor Improvements project. These dollars generated locally by this new sales tax will be combined with other state and federal transportation funds to fully fund this project.



The purpose of this project is to increase capacity and reduce congestion along US 278 from Moss Creek Drive to Squire Pope Road.

- Project Team is aware that a Section 4(f) analysis will be needed for potential impacts to the Refuge and Boat Ramp.
- USFWS owns the boat ramp and Beaufort County manages.
- FHWA to research exemption for refuge roads and potential streamline options available if USFWS agrees with proposed plan.
- Project Team has reviewed USFWS studies regarding the entrance to Pinckney Island.
- Project Team is developing and evaluating Refuge entrance alternatives.
- Possibility of relocating the entrance and the boat landing.
- USFWS has a long-term goal to create a Visitor's Center on the south side of the of the bridge, same side as the boat ramp.
- USFWS indicated that there are two archaeological resources located on the Refuge, they are Gullah cemeteries.
- USFWS would need to complete a Compatibility Study for any new roads system on the refuge.
- Project Team explained the funding for the project is contingent on the availability of additional funds by the county. If there is no additional funding, SCDOT will only replace the bridge over Mackay Creek.
- USFWS will develop their own document to approve.
- NEPA document will help Beaufort County and USFWS with their FLAP funding request.
- No Alternatives have been established yet. Currently working on corridor level alternatives.



- Project Team is looking for agency input on environmental review factors to be incorporated into alternatives analysis.
- Alternatives by late spring/early summer.
- Use of traffic light instead of interchange considered for access to boat ramp and refuge.
- Roadway evaluations will likely dictate where underpass would go or if underpass is even possible. An underpass would allow for bike/pedestrian access and create additional parking and access to the refuge.
- USFWS indicated that they preferred a southern shift if an off alignment is pursued because it would have less impact to the Refuge. Discussed Cooperating/Participating agency status with USFWS. Follow-up occurred and USFWS prefers to be a Participating Agency at the moment but could have the option to elevate to Cooperating Agency status once they know more what the project will include.

Public Involvement:

<https://www.scdot278corridor.com/>

Public involved in decision-making process

PIP in development

1st newsletter sent out in February and to be sent out quarterly

Regular social media updates

Stakeholder Meeting – March & June (quarterly meetings)

Draft Schedule:

Ambient Noise measurements have been conducted

ACE meeting Summer 2019 – Range of Alternatives

Final NEPA Decision in Winter 2020

Next Steps:

- Stakeholder involvement
- Environmental studies to begin
- Noise measurements (have started)
- Limited T&E. Any species occurrence data, bird counts, etc. from Refuge that can be shared would be greatly appreciated and can be included in our technical memorandum.
- Will schedule follow-up meeting with USFWS in Summer 2019.



Draft Schedule

Milestones	Date
2019	
<i>Agency Project Kickoff and Scoping Meeting</i>	<i>February 14, 2019</i>
Send Letters Inviting Cooperating and Participating Agencies	March 2019
Agencies review draft Purpose and Need Statement & Agency Coordination Plan	April-May 2019
Coordination Point for Agency Coordination Plan and Purpose and Need Statement	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
Coordination Point for Preliminary Range of Alternatives/Alternatives Carried Forward by Agencies	Fall 2019
Public Information Meeting	Fall 2019
Continued Coordination with Agencies on specific resources (i.e. Permitting, EFH, Section 106, Section 7, etc.)	Fall-Winter 2019
2020	
<i>Agency Meeting to discuss Reasonable Alternatives and Preferred Alternative</i>	<i>Spring 2020</i>
Agency Meeting and Coordination Point for Preferred Alternative by Agencies	Spring 2020
Submit Preliminary Jurisdictional Determination to USACE & Critical Area to SCDHEC-OCRM	Summer 2020
Pre-Application Meeting with USACE and SCDHEC	Summer/Fall 2020
Draft EA issued; Joint USACE Individual Permit and USCG Public Notices	Fall 2020
Public Hearing	Fall/Winter 2020
2021	
Prepare Final NEPA Decision	Early 2021
FHWA Issues Final NEPA Decision	Early 2021
USACE and USCG Issue Permit Decisions	Early 2021

US 278 - Pinckney Wildlife Refuge Coordination Meeting 1-3-4-19

<u>Name</u>	<u>Organization</u>	<u>Email</u>
Phil Leazer	KCI Technologies	phil.leazer@kci.com
ERIC BURGESS	KCI TECHNOLOGIES	ERIC.BURGESS@KCI.com
Craig Winn	SCDOT	winncl@scdot.org
Megan Groves	SCDOT	grovesme@scdot.org
David Kelly	SCDOT	kellydp@scdot.org
JoAnn Clark	USFWS Regional Office	joann_clark@fws.gov
Holly Geburzi	USFWS Savannah Coastal Refuge	holly_t-geburzi@fws.gov
SHANE BELCHER	FWSA	jeffrey.belcher@dot.gov
Mark Caldwell	USFWS	mark-caldwell@fws.gov
W. Shan Davis	USFWS	shan_davis@fws.gov
Russell Chandler	Three Oaks Engineering	russell.chandler@threeoaksengineering.com
Heather Robbins	Three Oaks Engineering	heather.robbins@threeoaksengineering.com
Russ Webb	USFWS	russell_webb@fws.gov
CHRISTOPHER COOLEY	USFWS - SAVANNAH COASTAL REFUGE	CHRISTOPHER.COOLEY@FWS.GOV CHRISTOPHER.COOLEY@FWS.GOV



Preliminary Range of Alternatives Coordination Meeting – Pinckney National Wildlife Refuge

June 25, 2019 at 2PM

USFWS Field Office

694 Beech Hill Lane, Hardeeville, SC

Attendees:

USFWS	Christopher Cooley Holly Gaboriault Mark Caldwell Russell Webb	christopher_cooley@fws.gov holly_t_gaboriault@fws.gov mark_caldwell@fws.gov russell_webb@fws.gov
SCDOT	Craig Winn David Kelly Megan Groves	winncl@scdot.org kellydp@scdot.org grovesme@scdot.org
KCI	Eric Burgess Phil Leazer	eric.burgess@kci.com phil.leazer@kci.com
Three Oaks Engineering	Geni Theriot Heather Robbins Russell Chandler	geni.theriot@threeoaksengineering.com heather.robbsins@threeoaksengineering.com russell.chandler@threeoaksengineering.com

Introductions

- Name and organization for each person around the table

Presentation from Craig

- 17 conceptual alternatives have been developed
- Input from stakeholders helped develop multiple alts in the 17
- Planning to show these concepts and the reasonable alternatives at the Public Info Meeting in Fall 2019

Current tasks completed or in progress:

- T&E surveys in progress
- Wetland surveys in progress
- GIS review near completion
- Geotech surveys near completion (?)

Presentation from Heather



Purpose and Need

- Address structural deficiencies of the EB Mackay Creek bridge, increase capacity, reduce congestion

Project scope has changed since the last meeting.

- New termini. Extended from Squire Pope Rd to Spanish Wells Rd.
- Since traffic studies were required all the way to Spanish Wells Road and there are additional lanes and other improvements beyond Spanish Wells Road, this point became the new logical termini.
- Making the project area any smaller would result in no logical termini for the corridor improvements.

“Spaghetti Map” overview

- Some alts include a brand new 6-lane facility with all new bridges
- Some alts would create a new access on/off Hilton Head Island
- Multiple alts utilizing the existing utility corridor
- Some alternatives involve different access improvements to Pinckney Island NWR

Evaluation Criteria

- GIS wetlands
- Right of Way – number of parcels that may be impacted
- Neighborhoods
- Protected lands – acres currently under protection in the corridor; includes Pinckney NWR
- Establish reasonable range of alternatives
- Will have a matrix of alternatives and identified reasonable alternatives presented to agencies in August 2019

Reasonable alternatives

- Anticipate 7-8 based on our preliminary analysis
- More evaluation criteria will be applied to these alternatives to identify a preferred alternative
- Purpose and need for the project will be applied to reasonable alternatives
 - o A little different than normal
 - o Due to the traffic component of the P&N. Traffic studies will be done on up to 8 alts instead of the 17-preliminary range

How do the preliminary range of alts affect Pinckney NWR?

- Important to note that all depictions for access to Pinckney NWR are concepts at this time. Can still be refined or reconfigured during the reasonable alts phase.
- Conceptual access designs vary between alternatives.



- During the last coordination meeting with USFWS about Pinckney, there was a preference that alternatives go to the south
- Alts 2, 3, 4A, & 7 all use a very similar access design
 - o Right in/out only for WB traffic + new “interchange” access for EB traffic that would go below the existing/proposed structures
 - o All would have similar R/W impacts that would result in slightly more SCDOT R/W than currently exists
 - Slight net loss in acreage for the NWR
- Alt 4D & 8 use similar access design
 - o Alts consist of a new road and new bridges to the south of existing
 - New road/bridges may only be 3 lanes
 - o Access to Pinckney may involve an “exit” and improving the existing access
 - Size of new access footprint will vary based on the 3 lanes vs 6 lanes of new road/bridges
 - Up to 8 ac net loss in NWR for new SCDOT R/W
- Alt 4C has unique access design
 - o This is one of the southernmost alignments that is anticipated to make it into the reasonable range of alts
 - o New 6 lane road/bridge facility
 - May require removal of all existing bridges on 278
 - o Access would involve a new “exit”/interchange for both EB/WB traffic
 - Could result in additional acreage being added to NWR if old R/W was transferred to USFWS after construction

General Discussion

- There is a specific process for R/W acquisition from USFWS
 - o Russ Webb to provide information to Project Team
- R/W acquisition process from USFWS is complicated and will require early coordination
 - o Expanding existing R/W is easier than purchasing new R/W
 - Even if there is a plan to convert existing back to NWR as a “trade/swap”
- Would it be possible to avoid new R/W on Pinckney?
 - o No. All alternatives, including just the replacement of the EB over Mackay Creek would require some additional R/W on Pinckney
- Who would own the new access road to the NWR?
 - o SCDOT would own all bridge structures crossing the NWR and any bridged ramps for the access to the NWR.
 - o USFWS would be responsible for all at-grade roadways used for access
- USFWS is concerned that many of the access concepts are located too far from the existing access and existing roadway
 - o Concerns with safety for visitors. History of break-ins and robbery of visitors.



- Law-enforcement on Pinckney is either the responsibility of USFWS or requires MOA/MOU with local law-enforcement.
 - Current access has been cleared and made to be as open as possible near parking to avoid “hiding places” for criminal activity
- During last meeting the discussion of “stay to the south” was meant in the context of alignments that get really far from existing alignment.
- There is a preference by USFWS that we stay as close to the existing alignment and access to Pinckney as possible.
 - Less R/W
 - Less law-enforcement concerns if we can utilize existing facilities and clear areas.
 - More compatible with NWR plan
 - If the access road goes too far south may be more prone to flooding and storm damage
 - Harder for USFWS to maintain access long-term
 - Difficult to maintain what they have now
- Compatibility with NWR plan and usage will be added as an evaluation criterion for reasonable alternatives
 - USFWS staff believes the existing location is more compatible than a new interchange on a new location.
- Access to Pinckney will be more thoroughly evaluated for reasonable alternatives.

Next Meeting

- July 23rd meeting via Adobe Connect – 10 AM
 - Project team will present the same information to be presented at August 2019 ACE meeting at SCDOT
 - Show which alternatives were determined to be reasonable alternatives
 - Results of alternatives evaluation
 - Draft list of reasonable alternatives evaluation criteria



Preliminary Range of Alternatives Coordination Meeting – Pinckney National Wildlife Refuge

July 23, 2019
10:00-11:00 AM
Adobe Connect

Attendees:

USFWS	Christopher Cooley Shaw Davis Mark Caldwell Russell Webb Eric Seagenske
SCDOT	Craig Winn David Kelly Megan Groves
FHWA	Shane Belcher
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Geni Theriot Heather Robbins Russell Chandler

Introductions

- Name and organization for each person around the table and on the phone

Presentation from Heather

- Confirmed everyone could see materials sent Friday, July 19, 2019 using Adobe Connect
- The materials seen today will be the same as the materials presented at the ACE meeting on August 8, 2019
- 17 conceptual alternatives were developed
- As previously discussed, the project was extended from Squire Pope Rd to Spanish Wells Rd.
- After ACE meeting, we will be requesting a coordination point from all participating and cooperating agencies



Initial Evaluation Criteria

An alternative development flowchart was developed and distributed for review at the June 13, 2019 meeting. These criteria were used to evaluate the preliminary range of alternatives and an alternatives matrix outlines the details of these criteria. Per discussions, from the last meeting, USFWS Compatibility was added to the initial evaluation criteria.

- GIS wetlands
- Right of Way – number of parcels that may be impacted
- Neighborhoods
- Protected lands – acres currently under protection in the corridor; includes Pinckney NWR
- USFWS Compatibility

Please note the asterisk included in the alternatives eliminated section of the flowchart represents alternatives eliminated as standalone alternatives, but these alternatives were not eliminated from being incorporated into a reasonable or preferred alternative.

Reasonable alternatives (RA)

- 6 reasonable alternatives came out of initial screening process
- The reasonable alternatives will be shown at the September 19, 2019 PIM
- More evaluation criteria will be applied to the Reasonable Alternatives to recommend a preferred alternative

Overview of Preliminary Range of Alternatives

- The matrix was used to outline how we got to the reasonable alternatives
- No Build
- Alternative 1:
 - o This alternative was eliminated
 - o Partial alternative
 - o Only includes Moss Creek to Pinckney Island
 - o If funding does not allow for full alignment any alternative can revert to this one
- Alternative 2 (RA1):
 - o First level of evaluation keeps this alternative moving forward
 - o New eastbound Mackay Creek Bridge south of existing, relocation of Pinckney Island boat ramp south of fishing dock, Pinckney Island access improvements, ties into improvements at Jenkins Island
- Alternative 3a (RA2)
 - o Similar alignment to Alternative 2 (RA1) but access to Pinckney is different
 - o The widening takes place to the north instead of the south
- Alternative 3b
 - o Close in design to Alternative 3a (RA2)
 - o Eliminated due to a bigger footprint and higher impacts



- Alternative 4a (RA3)
 - o This alternative is carried forward
 - o Design is close to existing alignment
 - o Differences in interchange as well as a new Skull Creek Bridge
- Alternatives 4b & 4c
 - o Both were eliminated
 - o Alternative 4b eliminated for high wetland impacts
 - o Alternative 4c eliminated for higher neighborhood impacts and less compatible for USFWS
- Alternatives 4d (RA4)
 - o This alternative is carried forward
 - o Design minimizes impacts to compatibility, wetlands and neighborhoods
- Alternatives 4e, 4f, 5a, 5b, 6a, 6b, 6c, 6d, 6e: All eliminated for wetland impacts, significant impacts to neighborhoods and/or protected lands, or USFWS compatibility
- Alternative 7 (RA5) & Alternative 8 (RA6)
 - o No change to how they impact Pinckney Island
 - o Difference is alignment north of Jenkins Island using existing powerline easement
 - o Lower wetland impacts

General Discussion

- USFWS is concerned with the Alternative 4 & Alternative 8 interchange on Pinckney Island
 - o USFWS prefers the interchange to be closer to existing
 - o KCI noted maximum impacts are depicted in the corridor maps.
 - o The reason the interchange was shifted south in these two alternatives was to avoid impacts to the existing boat ramp
 - o USFWS was asked if they would rather avoid the boat landing or impact boat landing and responded they had no preference regarding the boat landing since it will be relocated if impacted
- Handout Review
 - o Bullets to outline differences in alternatives
 - o The alternatives will also be outlined in the Alternatives Tech Memo
 - o Upcoming milestones
 - Coordination points
 - Will present Reasonable Alternatives at PIM
 - Reasonable Alternatives will be evaluated with 2nd level of criteria to recommend a proposed preferred alternative
 - Shellfish Harvesting Waters & EFH were added to 2nd level of criteria since June ACE meeting discussion



- USFWS (Mark Caldwell) asked if a compatibility determination can be given on a range of alternatives or is a single alternative needed to determine compatibility?
 - o Response: A compatibility determination can only be given to one alternative
 - o FHWA (Shane): Official compatibility determination will be on the proposed preferred alternative but right now we are looking for guidance on any red flags for compatibility so those can be removed. We are looking for “buy in” throughout the process.
 - o USFWS concurs with this path to vet out alternatives that won’t be compatibly but suggests changing language from compatibility to Consistent with Pinckney Island National Wildlife Refuge (PINWR) purposes.
 - o The goal of USFWS is what has the least impacts and what preserves the integrity of PINWR the most.
 - o Shane states we are also interested in which alternatives are compatible with long range plans on the refuge (visitors center, additional parking, etc.). We look to reduce impacts but also look for compatibility with future growth. Is there a management plan USFWS can share?
 - o USFWS will send Comprehensive Conservation Plan (CCP) which includes mission statement

Next Meeting

Spring 2020 – upon recommendation of a proposed preferred alternative

Action Items

- Three Oaks to change references to “USFWS Compatibility” to “Consistent with PINWR Purposes” on all ACE meeting materials



Reasonable Alternatives Coordination Meeting – Pinckney National Wildlife Refuge

October 9, 2019

1:00-2:00 PM

Adobe Connect

Attendees:

USFWS	Christopher Cooley Shaw Davis Mark Caldwell Russell Webb
SCDOT	Craig Winn David Kelly Megan Groves
FHWA	Shane Belcher
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Geni Theriot Heather Robbins Russell Chandler

Introductions/Overview

- Name and organization for each person around the table and on the phone
- Public Involvement Meeting #2 has occurred
- Moving towards additional analysis on alternatives presented at PIM #2
- Purpose of call: Follow up on reasonable alternatives and receive input/comments from US Fish and Wildlife Services

Presentation from Heather

- Confirmed everyone could see materials using Adobe Connect
- The materials seen today are the 6 reasonable alternatives presented at the Public Information Meeting on September 19, 2019
- Each alternative was presented individually with the chance to comment on each one.
- More evaluation criteria will be applied to the Reasonable Alternatives to recommend a preferred alternative



- Design will be refined throughout the process even after the preferred alternative is identified

Reasonable Alternative Discussion

- Review of 6 reasonable alternatives
- Interchanges and modifications to Pickney can still be modified.
- Overall there is concern with any new roads/right-of-way on the refuge that USFWS would have to maintain.
- Alternative 1 – 3
 - o Crosses the intertidal area
 - o Under the powerline on the north side of the existing highway are known archeological sites which the refuge would like to avoid impacting
- Alternative 4 & 6
 - o Pros:
 - One access point
 - May work well with plans for visitor centers/parking in the future
 - o Cons:
 - The southern tip of the island has known archeological sites which the refuge would like to avoid impacting
 - o USFWS concerns with the interchange on Pinckney Island
 - USFWS prefers the interchange to be closer to existing if possible
 - Refuge prefers elevated interchanges/ramps for alternatives off existing alignment
 - KCI noted maximum impacts are depicted in the corridor maps and it is possible to shift closer to existing during design.
 - Shane states we are also interested in which alternatives are compatible with long range plans on the refuge (visitors center, additional parking, etc.). We look to reduce impacts but also look for compatibility with future growth.
 - Kimley and Horn traffic studies
 - o Discussion of existing US 278 being restored and deeded back to the island if the southern alternatives move forward
 - o USFWS has not ruled out these alternatives- need more information on how much would be on structure vs. at grade. Need to continue coordination when we have more information on vertical structure heights and requirements.
- KCI requested USFWS to please provide any areas that need to be avoided as these will be pertinent during the design phase to avoid/minimize impacts to known resources
- USFWS asked if design could be a mini clover leaf on alignment above the existing bridge to avoid arch sites but recognized it may not be constructible.



Future Planning

- No “red flags” on any of the proposed alternatives
- Cultural resources subconsultant should be reaching out to USFWS for ARPA permit
- Next meeting at Pickney around Jan/Feb 2020.
- FHWA to share some data from previous work with USFWS at Waccamaw NRW in Horry.
Example 4(f) documentation is attached.

Comments from DNR (Susan Davis)

-Request that additional analysis considers further avoidance and minimization measures be considered in design elements such as shoulder widths, median widths, slope configurations, etc.

Example: would 10’ or 8’ shoulders be practicable instead of 12’; can slopes be reduced and so forth.

--Request that various construction methods be considered and evaluated that may avoid or minimize impacts. 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.



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

South Carolina
October 17, 2012

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

In Reply Refer To:
HDA-SC

Mr. Marshall Craig Sasser
Refuge Manager
Waccamaw National Wildlife Refuge
21424 N. Fraser Street
P.O. Box 1439
Georgetown, SC 29440

Dear Mr. Sasser:

The South Carolina Department of Transportation (SCDOT) in coordination with the Federal Highway Administration South Carolina Division (FHWA-SC) proposes to replace the existing U.S. 701 bridges over the Great Pee Dee River, Great Pee Dee overflow and Yauhannah Lake. The U.S. 701 bridge replacement project consists of the replacement and realignment of an approximately two mile long section of U.S. 701 located in Georgetown and Horry Counties. The purpose of the project is to replace the existing structurally deteriorated and functionally obsolete bridges and maintain the principal direct rural connection between the larger towns of Conway and Georgetown, as well as the smaller communities such as Bucksport and Yauhannah.

The Waccamaw National Wildlife Refuge (WNWR) was established in 1997 and is located adjacent to both sides of the existing U.S. 701 bridges. Through coordination with your office, the newly constructed bridges are proposed to be located north of the existing bridges in order to minimize impacts to the refuge. By locating the new bridges to the north, impacts to the Cowford Swamp area will be minimized. Shifting away from Cowford Swamp and the existing oxbow lake has been the preferred option by your office and others. One other advantage of shifting to the north would be that lower quality wetlands will be impacted. Wetlands are of a lesser quality due to an old road bed running along the upstream side of the existing bridges.

A Programmatic Section 4(f) Evaluation will be prepared in order to evaluate the impacts of the proposed project prior to the approval of any use of refuge land. This evaluation will address any feasible and prudent alternatives and all practicable planning measures to minimize harm to the refuge. In coordination with your office, FHWA-SC feels that the project meets FHWA's Programmatic Section 4(f) criteria for minor involvements with public parks, recreational lands, and wildlife and waterfowl refuges (attached).

Permanent impacts to the WNWR include a loss of approximately 5 acres of land parallel and directly adjacent to the existing bridges. Presently the WNWR encompasses nearly 27,000 acres and the proposed acquisition boundary spans over 55,000 acres. Based on these acreages, the project would impact 0.0185 percent of the existing refuge. The WNWR should see no net loss as a result of SCDOT's plans to replace the property impacted. Table 1 provides a comparison of impacts from the various alternatives. SCDOT plans to work with your office to find suitable replacement property to be turned over to the U.S. Fish and Wildlife Service (USFWS) as part of the mitigation for the project's impacts.

2
Mr. Craig Sasser
October 17, 2012

Table 1

Property Impacts	Alt. 1	Alt. 2 (Preferred)	Alt. 3	Alt. 4	Alt. 5
Residential Relocations	2	1	0	0	0
Acreage	1.62	0.94	0.00	0.00	0.00
Residential Take w/out Relocation	1	0	0	0	0
Acreage	0.73	0.00	0.00	0.00	0.00
Residential Partial Take	4	6	2	1	5
Acreage	0.64	1.04	0.16	0.15	0.34
Refuge Property (acres)	5.94	4.44	6.23	7.43	9.75
Wetland Impacts					
Permanent	10.92	9.50	8.25	10.12	15.69
Temporary	12.31	11.20	11.60	12.57	8.88

We ask for your concurrence that the location of the land to be used as a result of Alternative 2 shall not impair the use of the remaining Section 4(f) property, in whole or in part, for its intended purpose. The total amount to be acquired does not exceed 1 percent of the refuge which is within the criteria set by FHWA to qualify the project to be processed under the Programmatic Section 4(f) Evaluation for minor involvements with wildlife and waterfowl refuges.

If you concur with this assessment please sign below and return a copy to my office. We look forward to a continued coordination with you as this project progresses. Please address any questions you may have to Mr. J. Shane Belcher at 803-253-3187 or by e-mail at jeffrey.belcher@dot.gov.

Sincerely,



(for) Robert L. Lee
Division Administrator

Enclosures

CONCURRENCE:

Signed: 

Date: 10/17/2012

Mr. Marshall Craig Sasser
Refuge Manager – Waccamaw National Wildlife Refuge

cc: Mr. Tyke Redfearn, SCDOT Program Manager
Mr. Henry Phillips, SCDOT NEPA Environmental Coordinator

Final Nationwide Section 4(f) Evaluation and Approval for Federally-Aided Highway Projects with Minor Involvements with Public Parks, Recreation Lands, and Wildlife and Waterfowl Refuges

This programmatic Section 4(f) evaluation has been prepared for projects which improve existing highways and use minor amounts of publicly owned public parks, recreation lands, or wildlife and waterfowl refuges that are adjacent to existing highways. This programmatic Section 4(f) evaluation satisfies the requirements of Section 4(f) for all projects that meet the applicability criteria listed below. No individual Section 4(f) evaluations need be prepared for such projects. (Note: a similar programmatic Section 4(f) evaluation has been prepared for projects which use minor amounts of land from historic sites).

The FHWA Division Administrator is responsible for reviewing each individual project to determine that it meets the criteria and procedures of this programmatic Section 4(f) evaluation. The Division Administrator's determinations will be thorough and will clearly document the items that have been reviewed. The written analysis and determinations will be combined in a single document and placed in the project record and will be made available to the public upon request. This programmatic evaluation will not change the existing procedures for project compliance with the National Environmental Policy Act (NEPA) or with public involvement requirements.

Applicability

This programmatic Section 4(f) evaluation may be applied by FHWA only to projects meeting the following criteria:

1. The proposed project is designed to improve the operational characteristics, safety, and/or physical condition of existing highway facilities on essentially the same alignment. This includes "4R" work (resurfacing, restoration, rehabilitation, and reconstruction), safety improvements, such as shoulder widening and the correction of substandard curves and intersections; traffic operation improvements, such as signalization, channelization, and turning or climbing lanes; bicycle and pedestrian facilities; bridge replacements on essentially the same alignment; and the construction of additional lanes. This programmatic Section 4(f) evaluation does not apply to the construction of a highway on a new location.
2. The Section 4(f) lands are publicly owned public parks, recreation lands, or wildlife and waterfowl refuges located adjacent to the existing highway.
3. The amount and location of the land to be used shall not impair the use of the remaining Section 4(f) land, in whole or in part, for its intended purpose. This determination is to be made by the FHWA in concurrence with the officials having jurisdiction over the Section 4(f) lands, and will be documented in relation to the size, use, and/or other characteristics deemed relevant.

The total amount of land to be acquired from any Section 4(f) site shall not exceed the values in the following Table:

Total Size of Section 4(f) Site Maximum to Be Acquired

< 10 acres	10 percent of site
10 acres - 100 acres	1 acre
> 100 acres	1 percent of site

4. The proximity impacts of the project on the remaining Section 4(f) land shall not impair the use of such land for its intended purpose. This determination is to be made by the FHWA in concurrence with the officials having jurisdiction over the Section 4(f) lands, and will be documented with regard to noise, air and water pollution, wildlife and habitat effects, aesthetic values, and/or other impacts deemed relevant.
5. The officials having jurisdiction over the Section 4(f) lands must agree, in writing, with the assessment of the impacts of the proposed project on, and the proposed mitigation for, the Section 4(f) lands.
6. For projects using land from a site purchased or improved with funds under the Land and Water Conservation Fund Act, the Federal Aid in Fish Restoration Act (Dingell-Johnson Act), the Federal Aid in Wildlife Act (Pittman-Robertson Act), or similar laws, or the lands are otherwise encumbered with a Federal interest (e.g., former Federal surplus property), coordination with the appropriate Federal agency is required to ascertain the agency's position on the land conversion or transfer. The programmatic Section 4(f) evaluation does not apply if the agency objects to the land conversion or transfer.
7. This programmatic evaluation does not apply to projects for which an environmental impact statement (EIS) is prepared, unless the use of Section 4(f) lands is discovered after the approval of the final EIS. Should any of the above criteria not be met, this programmatic Section 4(f) evaluation cannot be used, and an individual Section 4(f) evaluation must be prepared.

Alternatives

The following alternatives avoid any use of the public park land, recreational area, or wildlife and waterfowl refuge:

1. Do nothing.
2. Improve the highway without using the adjacent public park, recreational land, or wildlife and waterfowl refuge.
3. Build an improved facility on new location without using the public park, recreation land, or wildlife or waterfowl refuge.

This list is intended to be all-inclusive. The programmatic Section 4(f) evaluation does not apply if a feasible and prudent alternative is identified that is not discussed in this document. The project record must clearly demonstrate that each of the above alternatives was fully

evaluated before the FHWA Division Administrator concluded that the programmatic Section 4(f) evaluation applied to the project.

Findings

In order for this programmatic Section 4(f) evaluation to be applied to a project, each of the following findings must be supported by the circumstances, studies, and consultations on the project:

1. **Do Nothing Alternative.** The Do Nothing Alternative is not feasible and prudent because: (a) it would not correct existing or projected capacity deficiencies; or (b) it would not correct existing safety hazards; or (c) it would not correct existing deteriorated conditions and maintenance problems; and (d) not providing such correction would constitute a cost or community impact of extraordinary magnitude, or would result in truly unusual or unique problems, when compared with the proposed use of the Section 4(f) lands.
2. **Improvement without Using the Adjacent Section 4(f) Lands.** It is not feasible and prudent to avoid Section 4(f) lands by roadway design or transportation system management techniques (including, but not limited to, minor alignment shifts, changes in geometric design standards, use of retaining walls and/or other structures, and traffic diversions or other traffic management measures) because implementing such measures would result in: (a) substantial adverse community impacts to adjacent homes, businesses or other improved properties; or (b) substantially increased roadway or structure cost; or (c) unique engineering, traffic, maintenance, or safety problems; or (d) substantial adverse social, economic, or environmental impacts; or (e) the project not meeting identified transportation needs; and (f) the impacts, costs, or problems would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of American Association of State Highway and Transportation Officials (AASHTO) geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.
3. **Alternatives on New Location.** It is not feasible and prudent to avoid Section 4(f) lands by constructing on new alignment because (a) the new location would not solve existing transportation, safety, or maintenance problems; or (b) the new location would result in substantial adverse social, economic, or environmental impacts (including such impacts as extensive severing of productive farmlands, displacement of a substantial number of families or businesses, serious disruption of established patterns, substantial damage to wetlands or other sensitive natural areas, or greater impacts to other Section 4(f) lands or (c) the new location would substantially increase costs or engineering difficulties (such as an inability to achieve minimum design standards, or to meet the requirements of various permitting agencies such as those involved with navigation, pollution, and the environment); and (d) such problems, impacts, costs, or difficulties would be truly unusual or unique, or of extraordinary magnitude when compared with the proposed use of Section 4(f) lands. Flexibility in the application of AASHTO geometric standards should be exercised, as permitted in 23 CFR 625, during the analysis of this alternative.

Measures to Minimize Harm

This programmatic Section 4(f) evaluation and approval may be used only for projects where the FHWA Division Administrator, in accordance with this evaluation, ensures that the proposed action includes all possible planning to minimize harm. This has occurred when the officials having jurisdiction over the Section 4(f) property have agreed, in writing, with the assessment of impacts resulting from the use of the Section 4(f) property and with the mitigation measures to be provided. Mitigation measures shall include one or more of the following:

1. Replacement of lands used with lands of reasonably equivalent usefulness and location and of at least comparable value.
2. Replacement of facilities impacted by the project including sidewalks, paths, benches, lights, trees, and other facilities.
3. Restoration and landscaping of disturbed areas.
4. Incorporation of design features (e.g., reduction in right-of-way width, modifications to the roadway section, retaining walls, curb and gutter sections, and minor alignment shifts); and habitat features (e.g., construction of new, or enhancement of existing, wetlands or other special habitat types); where necessary to reduce or minimize impacts to the Section 4(f) property. Such features should be designed in a manner that will not adversely affect the safety of the highway facility. Flexibility in the application of AASHTO geometric standards should be exercised, as permitted in 23 CFR 625, during such design.
5. Payment of the fair market value of the land and improvements taken or improvements to the remaining Section 4(f) site equal to the fair market value of the land and improvements taken.
6. Such additional or alternative mitigation measures as may be determined necessary based on consultation with, the officials having jurisdiction over the parkland, recreation area, or wildlife or waterfowl refuge.

If the project uses Section 4(f) lands that are encumbered with a Federal interest (see **Applicability**), coordination is required with the appropriate agency to ascertain what special measures to minimize harm, or other requirements, may be necessary under that agency's regulations. To the extent possible, commitments to accomplish such special measures and/or requirements shall be included in the project record.

Coordination

Each project will require coordination in the early stages of project development with the Federal, state and/or local agency officials having jurisdiction over the Section 4(f) lands. In the case of non-Federal Section 4(f) lands, the official with jurisdiction will be asked to identify any Federal encumbrances. Where such encumbrances exist coordination will be required with the Federal agency responsible for the encumbrance.

For the interests of the Department of Interior, Federal agency coordination will be initiated with the Regional Directors of the U.S. Fish and Wildlife Service, the National Park Service,

Mr. Craig Sasser
October 17, 2012

and the Bureau of Reclamation; the State Directors of the Bureau of Land Management, and the Area Directors of the Bureau of Indian Affairs. In the case of Indian lands, there will also be coordination with appropriate Indian Tribal officials.

Before applying this programmatic evaluation to projects requiring an individual bridge permit the Division Administrator shall coordinate with the U.S. Coast Guard District Commander.

Copies of the final written analysis and determinations required under this programmatic Section 4(f) evaluation shall be provided to the officials having jurisdiction over the involved Section 4(f) area and to other parties upon request.

Approval Procedure

This programmatic Section 4(f) approval applies only after the FHWA Division Administrator has:

1. Determined that the project meets the applicability criteria set forth above;
2. Determined that all of the alternatives set forth in the Findings section have been fully evaluated;
3. Determined that the findings in this document (which conclude that there are no feasible and prudent alternatives to the use of the publicly owned public park, recreation area, or wildlife or waterfowl refuge) are clearly applicable to the project;
4. Determined that the project complies with the Measures to Minimize Harm section of this document;
5. Determined that the coordination called for in this programmatic evaluation has been successfully completed;
6. Assured that the measures to minimize harm will be incorporated in the project; and
7. Documented the project file clearly identifying the basis for the above determinations and assurances.

Issued on: 12/23/86 Approved: /Original Signed By/ Ali F. Sevin Office of Environmental Policy Federal Highway Administration



Revised Reasonable Alternatives Coordination Meeting – Pinckney National Wildlife Refuge

January 30, 2020
2:00-3:30 PM

Attendees:

USFWS	Christopher Cooley Rick Kanaski Mark Caldwell Russell Webb Joann Clark
SCDOT	Craig Winn David Kelly Megan Groves
FHWA	Shane Belcher
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Geni Theriot Heather Robbins Russell Chandler

Introductions/Overview

- Name and organization for each person around the table and on the phone
- Brief project overview and update
- Purpose: Follow up on reasonable alternatives and the 3 revisions based on public input to get comments from US Fish and Wildlife Services on the least impactful alternatives

Reasonable Alternative Discussion

- Review of 6 reasonable alternatives and the revisions incorporated to develop 4a, 5a and 6a resulting in 9 reasonable alternatives
 - RA 4 modified to 4a with closer interchange to existing Pickney based on previous coordination with USFWS and coordination call with Waccamaw
 - RA 5 & 6 modified to pull off utility easement to minimize potential high costs of impacting utilities resulting in 5a and 6a



- 3 of the reasonable alternatives are rising to the top for further evaluation which include 2, 3 and 4a have the lowest impacts and are logical options for recommended preferred
 - o RA 2 and RA 3
 - Need to consider clearance for boats when designing for elevation
 - Boat ramp would not require relocation
 - Important to note the boat ramp is the only launch point for emergency services
 - Boat ramp is proposed to be used for the Daufuskie Island Ferry
 - USFWS expressed concerns with how far NE the footprint goes – would prefer staying out of the intertidal marsh as they do not want to fill any portion of the intertidal marsh
 - 5-year construction duration
 - o RA 4a
 - USFWS likes the road is elevated through the refuge which results in less impacts
 - Note potential archaeological sites to the south of alignment on Skull Creek side
 - New South should quantify impacts to cultural resources using the maximum APE to include all three reasonable alternatives (2,3 and 4a) as well as the boat ramp
 - USFWS concurs 4a is better for maintenance and regulatory needs
 - USFWS expressed concern with relocation of the boat ramp to the south due to salt marsh. If boat ramp relocation is required it could be moved north to the existing 278 alignment.
 - USFWS concerned with any new causeway and the associated cost of future maintenance
 - 3-year construction duration preferred by USFWS

Next Steps

- Cultural resources subconsultant has submitted ARPA permit application and will coordinate with USFWS
- USFWS will call in for March 12 ACE meeting
- Next USFWS meeting will be to discuss a recommended preferred in May/June



Preferred Alternative Coordination Meeting – Pinckney National Wildlife Refuge

May 7, 2020
10:00-11:30 AM

Attendees:

USFWS	Rick Kanaski Mark Caldwell Russell Webb Shaw Davis
SCDOT	Craig Winn David Kelly
FHWA	Shane Belcher
KCI	Eric Burgess Phil Leazer
Three Oaks Engineering	Geni Theriot Heather Robbins

Introductions/Overview

- Review of project and where we are in the process
- Purpose of the meeting: Review the reasonable alternative matrix and present the recommended preferred alternative as well as discuss Section 4(f) and archaeological sites.

Preferred Alternative Discussion

- Review of the Alternative matrix for the 9 reasonable alternatives
- Alternative 4a is the recommended preferred alternative
 - Alternative 4a has the lowest total wetland impacts
 - Elevated through PINWR and close to existing alignment, as requested by USFWS
 - Meets current seismic design standards with replacement of 4 out of 4 bridge structures
 - Construction Duration is 3 years and allows existing to stay in operation during construction
- Section 4(f)



- Pinckney Wildlife Refuge Impacts & Boat Ramp
 - New improved access to PINWR and boat ramp
 - New bike/ped access
 - Preferred Alternative would not affect PINWR's operation of the National Wildlife Refuge
- USFWS agrees there is a shot the Section 4(f) could be a net benefit
 - Would have to list all uses
 - County has a lease on 6 acres of PINWR which would have to be included
- FHWA suggests boat ramp would be looked at as a separate facility
 - Important to note the boat ramp is the launch point for emergency services
 - Boat ramp is proposed to be used for the Daufuskie Island Ferry
 - Coordination with the County would need to occur regarding future plans for the boat ramp.
- FHWA explains the programmatic evaluation will be an appendix to the EA
 - FHWA will provide specific layout for evaluation
- Two archaeological sites are located on PINWR
 - Need determination of archaeological sites to know if Section 4(f) also applies to those sites. If data recovery will take place, then Section 4(f) will not apply.
 - SCDOT is waiting on USFWS review/concurrence with Draft Cultural Report before sending to SHPO
 - USFWS is reviewing and will provide feedback by the end of next week
 - Site 38BU67 – SCDOT proposes to avoid
 - Site 38BU66 – Previously impacted by the existing US 278. SCDOT is evaluating ways to minimize. Preservation in place not warranted and excavation may be an option.
 - A MOA would be needed between FHWA, SCDOT and USFWS to address archaeological sites

Next Steps

- Agency Coordination Effort Meeting will be held on May 14 to present the preferred alternative.
 - Agencies will see the same presentation
 - FHWA suggests including the subject of the archaeological sites in the agency call as it is good information for SHPO