



Appendix O

Section 4(f) Coordination

June 2021



US 278 Corridor Improvements

Beaufort County, South Carolina

**Net Benefit Programmatic
Section 4(f) Evaluation**

Project ID: P030450
November 2020

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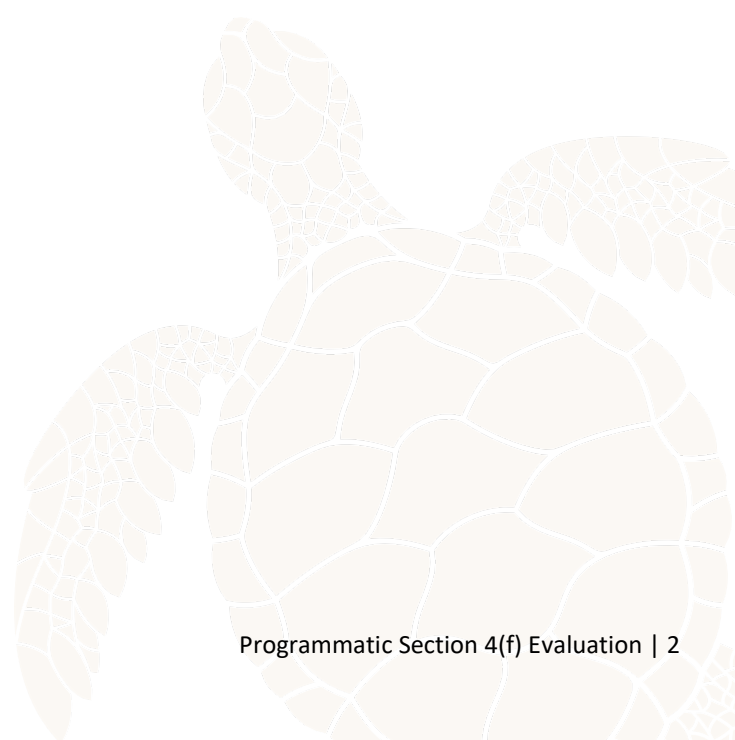
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1. Project Description

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. The project includes replacement of the eastbound Mackay Creek bridge and replacement of the three other bridges located within the PSA. The three additional bridges to be replaced 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 Lamp is also proposed as part of this project. The requirements of Section 4(f) apply to the proposed project because the proposed build alternatives require the use of land from PINWR and associated recreational facilities. Based on coordination between FHWA, SCDOT and United States Fish & Wildlife Service (USFWS), this project meets the applicability requirements for a Net Benefit Programmatic Section 4(f) Evaluation and Approval, established by the FHWA.

2. Purpose & Need

The purpose of this project is to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the PSA. While the original purpose of this project was to replace the structurally deficient eastbound Mackay Creek Bridge, the project has grown to include improvements throughout the corridor between Moss Creek Drive and Wild Horse/Spanish Wells Road. The eastbound Mackay Creek Bridge (traveling onto Hilton Head Island) was to be replaced as a part of SCDOT's bridge replacement program. The remaining three bridges in the PSA—one westbound bridge over Mackay Creek and the eastbound and westbound bridges over Skull Creek, which cross the Intracoastal Waterway-- are also being evaluated for potential improvements. In addition, access improvements to PINWR and the C.C. Haigh, Jr. boat ramp are also proposed as part of this project.

3. Identification of Section 4(f) Property

3.1 Pinckney Island Wildlife Refuge

FHWA has determined that Section 4(f) applies to PINWR. The existing US 278 crosses over PINWR which is approximately 0.5 miles west of Hilton Head Island (Figure 1). The island is bound by Skull Creek (the Intracoastal Waterway) on the east, Mackay Creek on the west, and its northern tip faces Port Royal Sound.

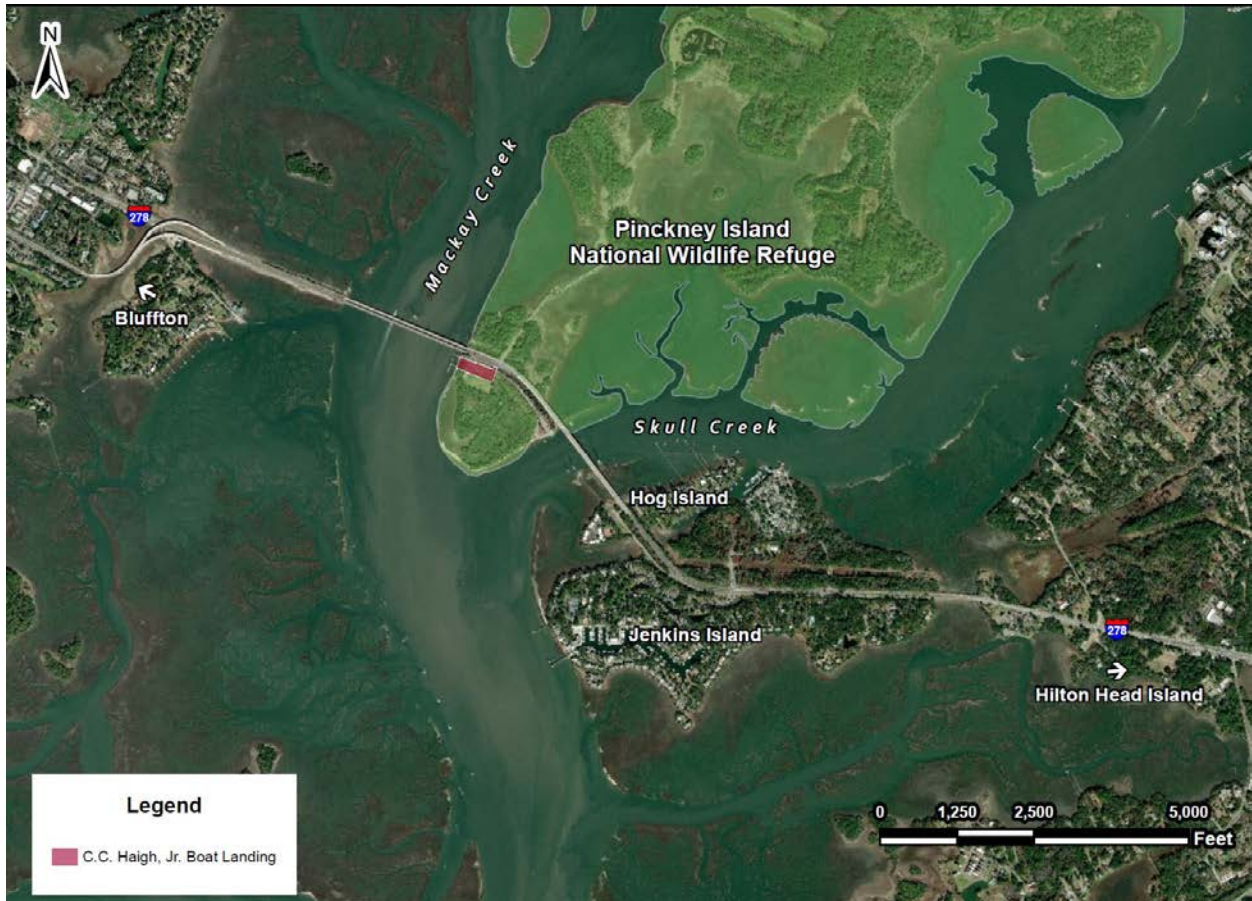


Figure 1: Pinckney Island Wildlife Refuge & C.C. Haigh, Jr. Boat Landing

PINWR is a 4,053-acre refuge established in 1975 when the land was donated to the USFWS. PINWR was created with the purpose to protect, maintain, and where possible, enhance habitat for native wildlife, including migratory and resident birds and threatened and endangered species. PINWR offers a variety of recreation activities including hunting, fishing, wildlife observation, photography, and environmental education and interpretation for the enjoyment of present and future generations. All Reasonable Alternatives would require use of PINWR property.

The C.C. Haigh, Jr. Boat Landing is located on PINWR south of the existing US 278 Mackay Creek Bridge and provides access to Mackay and Skull Creeks. The boat landing is managed by an agreement with Beaufort County and used by USFWS, Beaufort County residents, local emergency services, as well as individuals from outside the general area, for recreational boating and fishing opportunities. This facility provides a two-lane boat ramp, a courtesy dock and paved parking for approximately 90 vehicles/trailers. The current access to and from the existing C.C. Haigh, Jr. Boat Landing facility needs improvements due to the location and configuration of the existing access roads.

The 2011 Savannah Coastal National Wildlife Refuges Complex Comprehensive Conservation Plan also references the high volume of use of the boat landing by saltwater fisherman, law enforcement, and the public. The proposed improved access road system will benefit all users.

4. Existing Management Plan

- 2011 Savannah Coastal National Wildlife Refuges Complex Comprehensive Conservation Plan.¹
- 2009 Savannah & Pinkney Island National Wildlife Refuge Transportation Study Report²
- 2008 Savannah (SC 170, US 17) and Pinkney Island National Wildlife Refuges Road Safety Audit³

As outlined in the above documents, plans included improved access/safety for PINWR. These studies recommended an underpass be constructed for PINWR to improve access. As outline below, SCDOT and USFWS have requirements for existing transportation systems and operations.

SCDOT requirements:

- The Mackay Creek bridge is nearing the end of its structural life and needs to be replaced.
- The existing intersection on PINWR is geometrically deficient creating safety issues which warrant improvement. The proposed improvements require right-of-way acquisition from PINWR.

PINWR requirements:

- Improve visitor experience by providing improved access from US 278.
- Improve bike and pedestrian trail continuity across PINWR.

Following extensive coordination between SCDOT and USFWS, a mutually beneficial plan was developed.

- SCDOT will replace and widen the Mackay Creek and Skull Creek bridges and construct an interchange on PINWR, enhancing capacity, improving traffic flow and providing safer access.
- Reconfiguration of the US 278 intersection will provide a safer and more efficient separation of US 278 traffic from visitors accessing their existing facilities. The interchange would replace the at-grade intersection and allow vehicles to pass underneath the existing bridges to access either side of the island and provide full access to US 278. The interchange and multiuse pathway would improve safety and accessibility to PINWR and the CC Haigh Jr. Boat Landing.
- A new ten-foot paved multiuse path and a five-foot sidewalk would be constructed as a part of the US 278 Corridor Improvements Project. The multiuse path would extend along US 278 from Moss Creek Drive to Blue Heron Point Road and continue all the way to Squire Pope Road, where it then will connect into integrated large-scale bike/ped facilities throughout Hilton Head Island. The US 278 Corridor Improvements Project will create a separate, dedicated facility that will safely accommodate bike-ped traffic and allow access to PINWR from anywhere within Hilton Head Island as well as the mainland.

5. Official with Jurisdiction over Section 4(f) Property

The official with jurisdiction is the USFWS and its representative was determined to be the Pinckney Island National Wildlife Refuge Manager.

6. Applicability Determination

As discussed in Sections 3.1 and 3.2 above, the proposed US 278 Corridor Improvements project will use portions of both the USFWS' PINWR as well as the publicly operated C.C. Haigh, Jr. Boat Landing.

Measures to minimize harm have been incorporated into the project's design.

Potential mitigation that preserves and enhances those activities, features, and attributes of the Section 4(f) property have been proposed. A list of the mitigation/minimization measures incorporated into the project's design for the Section 4(f) resources are provided below. For more details and a description of these measures refer to Section 9.

Pinckney Island Wildlife Refuge

- Safety improvements including a new right-in/right-out interchange
- Adjusting the new US 278 interchange to minimize (or eliminate) impacts to saltmarsh
- Recommended Preferred Alternative will remain on bridge structure crossing the refuge to minimize impacts

C.C. Haigh, Jr. Boat Landing

- Provide an improved access road system
- Accessibility to existing landing during construction

7. Alternatives

7.1 Do-Nothing Alternative

The Do-Nothing Alternative was considered for the US 278 Corridor Improvement project. This alternative does not meet the purpose and need to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the PSA. If the Do-Nothing Alternative were selected, the existing bridge would continue to age and deteriorate as repair options would be limited to only routinely scheduled maintenance operations. The Do Nothing Alternative would likely result in posted weight restrictions on the bridge which would reduce the ability of US 278 to handle the transportation needs it currently serves. Continued deterioration could result in a future closure of the bridge to all vehicular traffic. The Do-Nothing Alternative would not provide for the proposed access improvements to PINWR; without these improvements USFWS would be unable to address the current access and safety issues outlined in their management plans until funding was available.

7.2 Rehabilitation Alternative

The Rehabilitation Alternative was also considered in place of the proposed US 278 Corridor Improvement project. The Rehabilitation Alternative does not meet the purpose and need to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion. Rehabilitation measures include painting of all existing structural steel, joint replacements, bearing and anchor bolt replacements, spall and crack repair on multiple substructure units. Additionally, this work would include retrofits to improve the performance of the structures during a seismic event. This work would include significant modifications to the bridge columns and pilings as well as additional seismic restraints to prevent the beams from falling off the caps during a seismic event. It should be noted that these retrofits will not improve the structure enough to survive a significant earthquake. Additionally, rehabilitation would only marginally extend the service life of the structures. Retaining the existing structures will require increased maintenance in the immediate future and they would still require replacement within the service life of the proposed single new structure over Mackay Creek. The Rehabilitation Alternative would not provide for the proposed access improvements to PINWR; without these improvements USFWS

would be unable to address the current access and safety issues outlined in their management plans until funding was available.

7.3 Avoidance on New Alignment Alternative

A wide range of alternatives were developed and analyzed to determine compatibility with the project's purpose and need to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the PSA. Additionally, the new alignment alternatives would not provide for the proposed access improvements to PINWR; without these improvements USFWS would be unable to address the current access and safety issues outlined in their management plans until funding was available. Nineteen preliminary alternatives assuming three lanes in each direction have been developed, including developing a corridor on new alignment. Of the 19 preliminary alternatives, seven were new alignment alternatives which included:

- Four new alignment alternatives to the south of existing US 278 which avoided PINWR and C.C. Haigh, Jr. Boat Landing completely
- One new alignment alternative to the south of existing US 278 which impacts PINWR and included improvements PINWR interchange and C.C. Haigh, Jr. boat landing
- Two new alignment alternatives to the north of existing US 278 which avoided C.C. Haigh, Jr. boat landing but still crossed PINWR on the north end of the island

As shown in Figure 1, the majority of the property associated with PINWR is to the north of US 278. Early coordination between FHWA, SCDOT, and USFWS identified the area north of US 278 to be a high priority for protection. As such, USFWS indicated that they would not like this property on the north side of US 278 to be impacted by a new alignment roadway. A future visitor center is a long-term goal on the southern side of US 278 and access to that proposed center would be beneficial. USFWS supported the proposed alignment being close to the existing US 278 corridor.

As discussed in Chapter 3 of the Environmental Assessment, the preliminary range of alternatives were evaluated using criteria that included the projected number of properties that may be impacted, as well as potential impacts to neighborhoods, protected lands (including PINWR), and wetlands. Potential impacts were quantified using Geographical Information Systems (GIS) and the best available data from federal, state, and local government sources. Based on the comparison of the 19 preliminary alternatives, six Proposed Reasonable Alternatives were carried forward. The four new alignment alternatives which avoided PINWR and C.C. Haigh, Jr. Boat Landing completely would not provide the access and safety improvements to meet the needs of PINWR. By avoiding PINWR, SCDOT is missing the opportunity to provide the benefit of improved access to PINWR. The evaluation of the new alignment alternatives showed substantially higher impacts to the natural and human environment such as the high number of relocations and wetland impacts. The construction costs for the new alignment alternatives were also considerably higher. Due to these factors, none of the new alignment alternatives were carried forward as Reasonable Alternatives.

7.4 Build Alternatives

The 19 Preliminary Range of Alternatives discussed in 7.4, which included the six Proposed Reasonable Alternatives were presented to the public at a Public Information Meeting on September 19, 2019. Based on input received from the public and the USFWS, the six Proposed Reasonable Alternatives were revised to a total of nine reasonable alternatives. Specific to PINWR and C.C. Haigh, Jr. boat landing, coordination

with USFWS resulted in a revision to Alternative 4 that moved the proposed interchange on Pinckney Island closer to the existing US 278 Corridor. This revision resulted in a new alternative, Alternative 4A which was more in line with the purposes of PINWR. In this section, each reasonable alternative is presented and described in detail. For more details on the alternatives and the evaluation process please see Chapter 3 of the Environmental Assessment.

Reasonable Alternative 1

Reasonable Alternative 1 (see Figure 2), establishes a new right-in/right-out interchange to PINWR and C.C. Haigh Jr. Boat Landing, allowing vehicles to pass underneath the existing bridges to access either side of the island and provides full access to US 278. At PINWR, the roadway shifts from the newly constructed Mackay Creek bridge to use the existing US 278 alignment as much as possible as it crosses Skull Creek. This alignment will require relocation of the existing boat ramp while allowing the existing dock to remain.



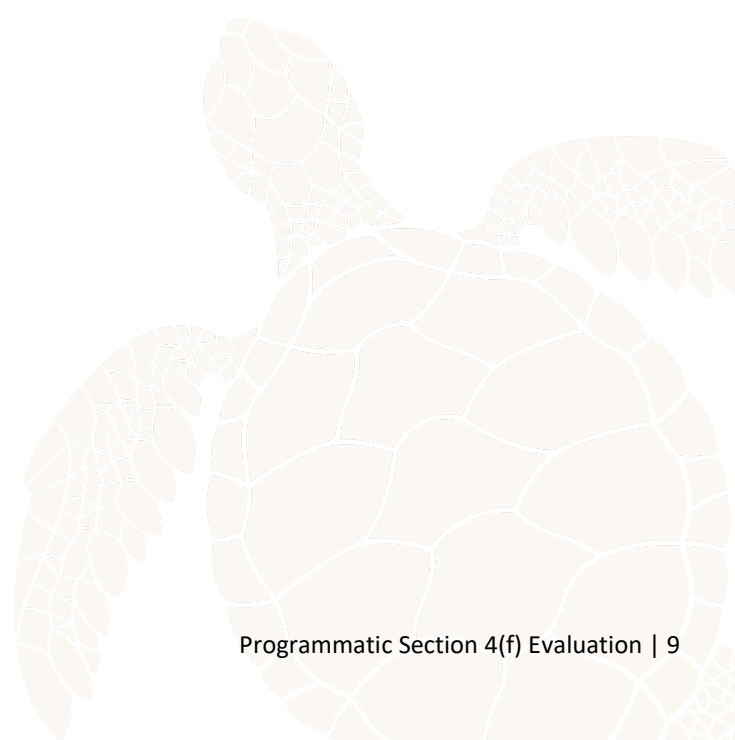
Figure 2: Reasonable Alternative 1

Reasonable Alternative 2

Reasonable Alternative 2 is like Reasonable Alternative 1 at PINWR except no impacts to the boat landing are anticipated. See Figure 3 for more details.



Figure 3: Reasonable Alternative 2

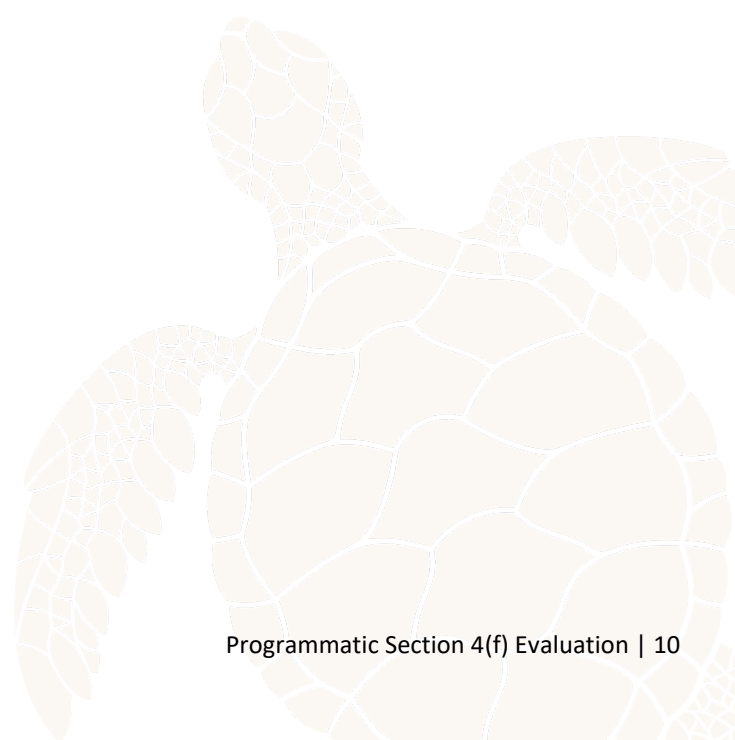


Reasonable Alternative 3

Reasonable Alternative 3 (Figure 4) also incorporates a new right-in/right-out interchange to the PINWR and C.C. Haigh Jr. Boat Landing, allowing vehicles to pass underneath the existing bridges to access either side and provide full access to US 278. This alignment will require relocation of the existing boat ramp while allowing the existing dock to remain.



Figure 4: Reasonable Alternative 3

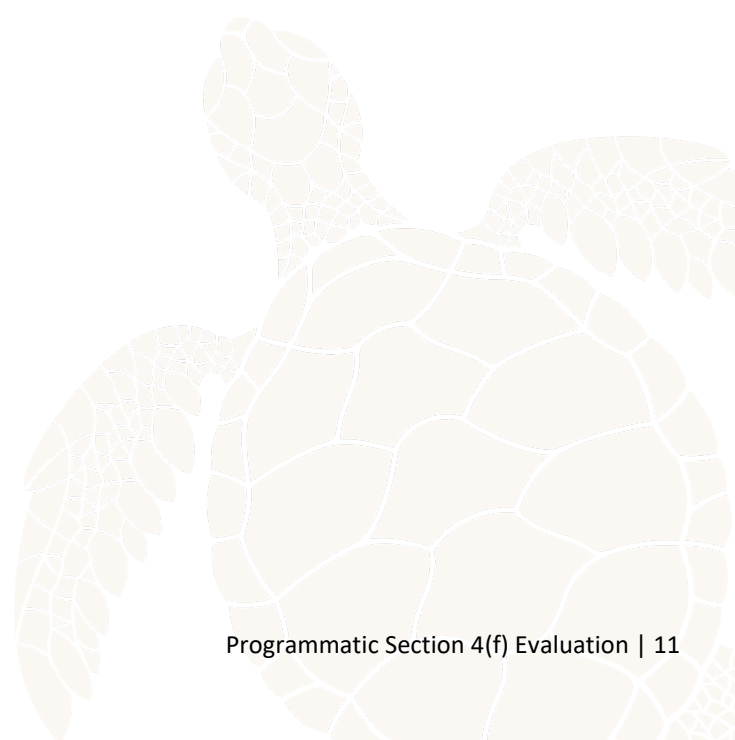


Reasonable Alternative 4

Reasonable Alternative 4 abandons the existing at-grade intersection on PINWR and also includes a new right-in/right-out interchange to the PINWR and C.C. Haigh Jr. Boat Landing, allowing vehicles to pass underneath the newly constructed bridges to access both the PINWR and the boat ramp with full access to US 278 (Figure 5). Impacts to the boat landing are not anticipated for this alternative.



Figure 5: Reasonable Alternative 4

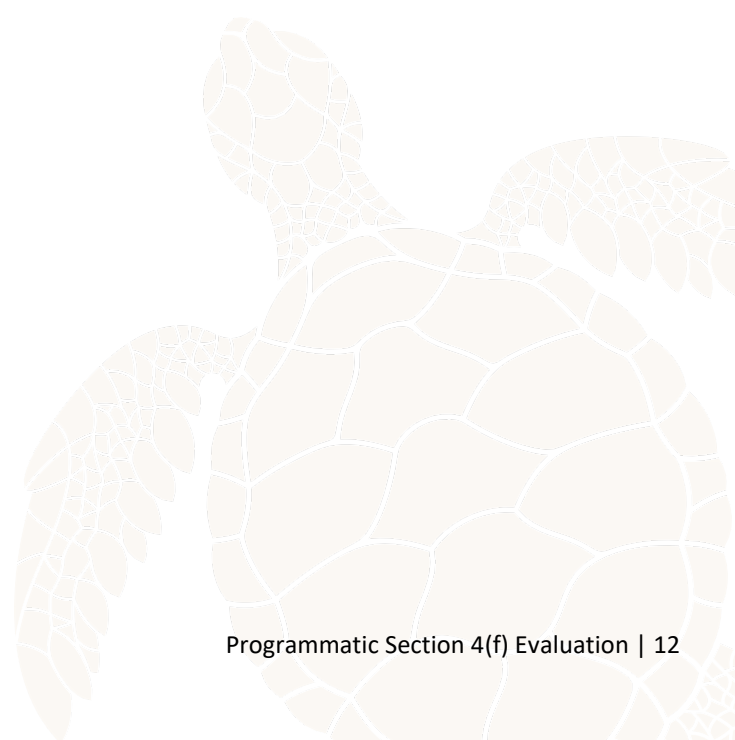


Reasonable Alternative 4A

Reasonable Alternative 4A is a revision of Alternative 4 which based on public input, including coordination with USFWS, moved the proposed interchange on Pinkney Island closer to the existing US 278 Corridor. The interchange is also a right-in/right-out interchange to PINWR and C.C. Haigh Jr. Boat Landing, allowing vehicles to pass underneath the newly constructed bridges to access both the PINWR and the boat ramp with full access to US 278 (Figure 6). This alternative abandons the existing at-grade intersection on PINWR and requires relocation of the existing boat ramp and the dock.



Figure 6: Reasonable Alternative 4A

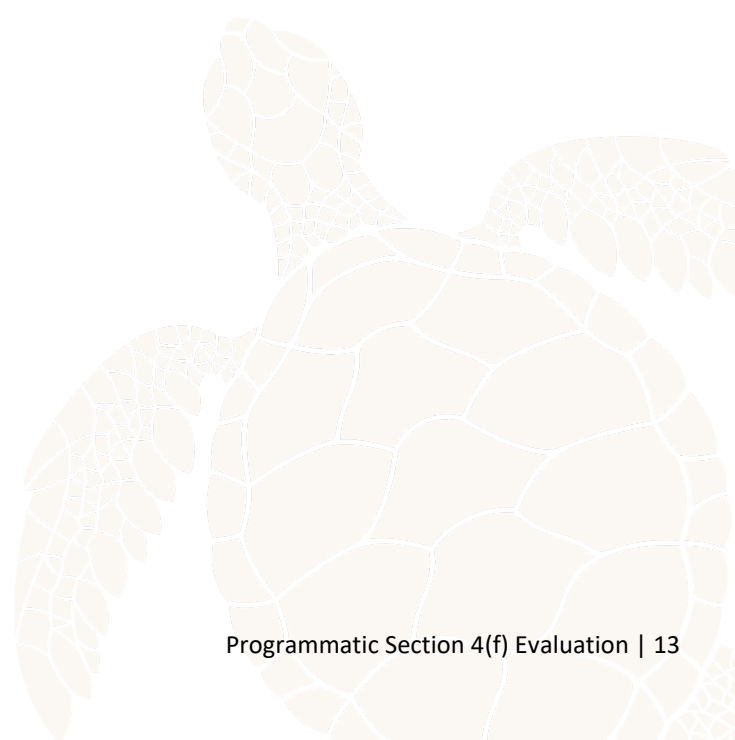


Reasonable Alternative 5

Reasonable Alternative 5 (Figure 7) includes a new right-in/right-out interchange to be introduced at the PINWR and C.C. Haigh Jr. Boat Landing closer to the existing interchange alignment, allowing vehicles to pass underneath the newly constructed bridges to access either side and provide full access to US 278. This alignment will require relocation of the existing boat ramp while allowing the existing dock to remain.



Figure 7: Reasonable Alternative 5

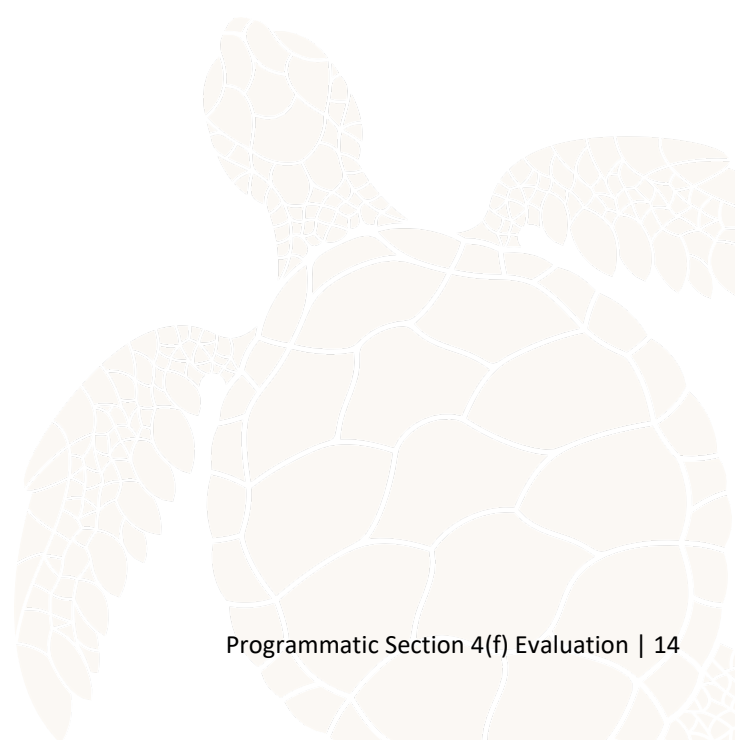


Reasonable Alternative 5A

Reasonable Alternative 5A (Figure 8) is a revision of Alternative 5 which based on public input moved the proposed alignment south of an existing powerline not associated with PINWR to lessen utility impacts. Alternative 5A is identical to Alternative 5 in terms of impacts on PINWR. This alignment will also require relocation of the existing boat ramp while allowing the existing dock to remain.



Figure 8: Reasonable Alternative 5A

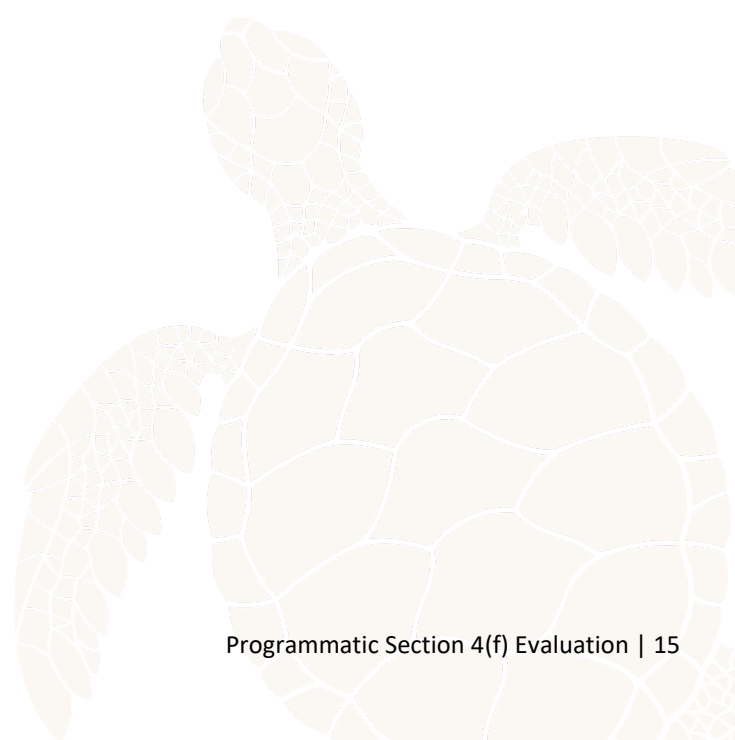


Reasonable Alternative 6

Reasonable Alternative 6 abandons the existing at-grade intersection on PINWR and also includes a new right-in/right-out interchange to the PINWR and C.C. Haigh Jr. Boat Landing, allowing vehicles to pass underneath the newly constructed bridges to access both the PINWR and the boat ramp with full access to US 278 (Figure 9). Impacts to the boat landing are not anticipated for this alternative.



Figure 9: Reasonable Alternative 6



Reasonable Alternative 6A

Reasonable Alternative 6A (Figure 10) is a revision of Alternative 6 which based on public input moved the proposed alignment south of an existing powerline not associated with PINWR to lessen utility impacts. Alternative 6A is identical to Alternative 4A in terms of impacts on PINWR. This alignment will also require relocation of the existing boat ramp while allowing the existing dock to remain.



Figure 10: Reasonable Alternative 6A

8. Findings of the Alternative Analysis

The alternatives were evaluated to determine how they would impact PINWR. Factors to determine if an alternative was “feasible and prudent” are defined in 23 CFR 774.17 and include the following:

- An alternative is feasible if it can be built as a matter of sound engineering judgment.
- An alternative is not prudent if:
 - It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purposes and need;
 - It results in unacceptable safety or operational problems;
 - After reasonable mitigation, it still causes:
 - Severe social, economic, or environmental impacts;
 - Severe disruption to established communities;
 - Severe disproportionate impacts to minority or low income populations; or
 - Severe impacts to environmental resources protected under other Federal statutes;

- It results in additional construction, maintenance, or operational cost of an extraordinary magnitude;
- It causes other unique problems* or unusual factors; or
- It involves multiple factors listed above, that while individually minor, cumulatively cause unique problems* or impacts of extraordinary magnitude.

8.1 Do-Nothing Alternative

As discussed in Section 7.1, the Do-Nothing Alternative does not meet the purpose and need to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the PSA. Due to future maintenance challenges and safety hazards posed by the existing structurally deficient bridge and the potential restrictions placed on travel and the transport of goods if no action is taken, it is determined that this alternative compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need; that the Do-Nothing Alternative fails the Section 4(f) prudent and feasible standard and is not recommended.

8.2 Rehabilitation Alternative

As discussed in Section 7.2, preliminary engineering shows rehabilitation would only marginally extend the service life of the structures. Retaining the existing structures will require increased maintenance in the immediate future and they would still require replacement within the service life of the proposed single new structure over Mackay Creek. Due to the age of, structural condition, and substandard elements of the bridge, the Rehabilitation Alternative is determined to fail the Section 4(f) prudent and feasible standard. The Rehabilitation Alternative would result in unacceptable safety or operational problems and would result in additional construction, maintenance, or operational cost so it is not recommended.

8.3 Avoidance on New Alignment Alternative

As discussed in Section 7.3, the evaluation of the new alignment alternatives showed substantially higher impacts to the natural and human environment as well as construction cost. Also considered was the fact that by avoiding PINWR, SCDOT is missing the opportunity to provide the benefit of improved safer access required by PINWR. The new alignment alternatives would result in unacceptable safety or operational problems and would result in additional construction, maintenance, or operational cost. Due to these factors, the new alignment alternatives were determined to fail the Section 4(f) prudent and feasible standard and are not recommended.

8.4 Build Alternatives

As seen in Table 1, all reasonable alternatives use the Section 4(f) PINWR and six out of the nine reasonable alternatives impact the C.C. Haigh, Jr. Boat Landing facility.

Table 1: Reasonable Alternative Impacts on PINWR and C.C. Haigh, Jr Boat Landing

	RA 1	RA 2	RA 3	RA 4	RA 4A	RA 5	RA 5A	RA 6	RA 6A
PINWR Impacts (acres)	17.6	15.9	18.7	18.1	23.3	18.6	18.7	18.0	22.2
C.C. Haigh, Jr. Boat Landing Impacted	Boat Ramp	None	Boat Ramp	None	Boat Ramp & Dock	Boat Ramp	Boat Ramp	None	Boat Ramp & Dock
Delineated Wetlands (acres)	19.3	18.4	19.3	18.9	18.0	30.5	26.9	29.8	25.3
ROW (acres)	28.1	27.2	31.5	35.2	36.8	63.9	63.3	71.7	72.3
Relocations	10	10	9	11	11	16	19	17	20
Meets Current Seismic Design Standards (# of structures)	1 of 4	1 of 4	2 of 4	4 of 4	4 of 4	2 of 4	2 of 4	4 of 4	4 of 4
Consistent with PINWR Purposes	Consistent	Consistent	Consistent	Less Consistent	More Consistent	Consistent	Consistent	Consistent	Consistent

As discussed in Chapter 3 of the Environmental Assessment, all the proposed Reasonable Alternatives meet the overall Purpose and Need (address structural deficiencies at eastbound Mackay Creek and reduce congestion along US 278). All Reasonable Alternatives also provide a right-in/right-out via a modified interchange to access PINWR which provides a safer and more efficient separation of US 278 traffic from visitors accessing PINWR.

The Recommended Preferred Alternative 4A provides the least amount of total wetland impacts and lowest impacts to tidal salt marsh/critical area wetlands. Alternative 4A would also have minimum ROW and relocation impacts in comparison to the other Proposed Reasonable Alternatives. The existing Mackay Creek and Skull Creek bridges do not meet current seismic design standards. Alternative 4A would result in a new 6-lane facility with four new structures that would meet current seismic design standards. These new structures would add longevity and increased safety to this singular link between Beaufort and Hilton Head.

Coordination with USFWS on January 30th, 2020 to discuss the six reasonable alternatives revealed Alternative 4A was the most consistent with PINWR purposes. USFWS expressed that Alternative 4A was the best alternative for their maintenance and regulatory needs. Alternative 4A would also avoid impacts to the intertidal marsh while both Alternative 2 and 3 would require fill in portions of the marsh.

In balancing the impacts that would be caused by the alternatives, FHWA must consider multiple factors. Although some alternatives show lower impacts, other factors led to the determination of the Recommended Preferred Alternative 4A. Table 1 shows that Reasonable Alternative 2 has less impact to PINWR; however, based on coordination with USFWS this alignment bisected the north portion of PINWR which USFWS wanted to avoid. Similarly, while Reasonable Alternative 4 has fewer acreage impacts to PINWR, USFWS requested the alignment of Alternative 4 be shifted closer to the existing alignment which resulted in the development of the Recommended Preferred Alternative 4A.

Permanent impacts to PINWR for Recommended Preferred Alternative 4A include a use of approximately 32 acres of the 4,053 acres on PINWR land parallel and directly adjacent to the existing US 278 alignment. This will be less than one percent of PINWR property. PINWR should experience no net loss because of SCDOT's plans to make much needed intersection safety and access improvements for PINWR and the C.C. Haigh, Jr. Boat Landing, and the return of portions of the existing US 278 back to PINWR. The use of PINWR will continue for its intended purpose. The Recommended Preferred Alternative 4A is determined to meet the Section 4(f) prudent and feasible standard and is recommended.

8.4.1 Pinckney Island Wildlife Refuge

Permanent impacts to PINWR for Recommended Preferred Alternative 4A include the use of approximately 32 acres of refuge land parallel and directly adjacent to the existing US 278 roadway. This will be less than 1% of the total acreage of PINWR. The Recommended Preferred Alternative 4A results in fewer impacts on PINWR due to the proposed new facility being elevated. The abandonment of the existing US 278 roadway and at-grade intersection may provide portions of this land back to PINWR.

There are approximately 200,000 visitors to PINWR annually. The island is used exclusively as a nature and forest preserve. Existing visitor facilities on PINWR include a kiosk with information/interpretive panels, wayside exhibits, parking area and trails. According to the 2011 Savannah Coastal National Wildlife Refuges Complex Comprehensive Conservation Plan, the future goals and objectives for PINWR include planning for development of a Visitor/Welcome Center which will include classroom facilities, an observation tower and include a concessionaire operated transport system as well as development of an environmental education pavilion. These future goals also include expansion of the existing nine miles of hiking/biking trails as well as the expansion of game hunting opportunities. As outlined in the 2009 Savannah & Pinkney Island National Wildlife Refuge Transportation Study Report,^[i] and the 2008 Savannah (SC 170, US 17) and Pinkney Island National Wildlife Refuges Road Safety Audit^[ii] there are current safety issues with the ingress and egress to the existing PINWR entrance. These safety issues need to be addressed; however, USFWS does not have readily available funding for the improvement at this time. The US 278 Corridor Improvements project includes these access improvements in the design plans. The proposed project is consistent with USFWS long term plans by providing safer access to the PINWR and the visitors/education center from US 278. These improvements would provide existing users, as well as the anticipated increased level of future users of PINWR a safer access to their facilities. Under this scenario, the use of PINWR will continue for its intended purpose.

The Recommended Preferred Alternative 4A results in the relocation of the boat landing. Although the design of the boat ramp is still being developed, one option is for it to be relocated to the north of US 278 and placed on the existing US 278 alignment. Figure 11 shows the proposed location of the new boat

landing. Upon completion of construction, new access roads from the new US 278 facility will be provided. The completed project will result in improved access to the boat landing for both east and westbound traffic, hence improving the overall safety of site access for all those using these facilities. Overall, the proposed US 278 Project will have a positive impact on the C.C. Haigh, Jr. Boat Landing facility.



Figure 11: Proposed Location of C.C. Haigh, Jr. Boat Landing

9. Mitigation and Measures to Minimize Harm

The proposed US 278 Corridor Improvements Project includes all appropriate measures to minimize harm and subsequent mitigation necessary to preserve and enhance those features and values of the property that originally qualified the property for Section 4(f) protection. Early and effective interagency coordination was a key component to establishing the mitigation and minimization measures for both the PINWR and the C.C. Haigh, Jr. Boat Landing. At a minimum, it is the intent of FHWA to provide replacement of the existing two-lane boat ramp, a courtesy dock and paved parking for approximately 90 vehicles/trailers. The design of these facilities and included improvements will be finalized through coordination with USFWS. Section 10 of this evaluation describes the details of the coordination efforts.

9.1 Pinckney Island Wildlife Refuge

- A new right-in/right-out interchange will be introduced at the PINWR and C.C. Haigh Jr. Boat Landing closer to the existing interchange alignment allowing vehicles to pass underneath the

newly constructed bridges to access both the PINWR and the boat ramp with full access to US 278. The addition of right-in/right-out interchange will enhance safety at this location.

- Where applicable, portions of the abandoned US 278 roadway and at-grade intersection on PINWR will be returned to PINWR
- Adjusting the new US 278 interchange on PINWR to continue the minimization (or elimination) of impacts to saltmarsh located north of the existing US 278 alignment.
- Replacement of the existing boat landing (ramp and dock) including paved parking
- The existing boat landing will be accessible as much as possible during the construction of the project with an emphasis on safety throughout construction. However, there will be a period when construction activities will take place in and around the boat landing area, and the use of this facility may be impacted.
- The proposed project will provide an improved and safer access road system to and from US 278.

10. Coordination

FHWA and SCDOT organized meetings with USFWS throughout the project to discuss the potential impacts to the PINWR and the C.C. Haigh, Jr. boat ramp owned by USFWS. Meetings were held at key points in the project development process to keep USFWS updated and to receive feedback. Meeting dates are listed below, and meeting summaries are in Appendix A of the Environmental Assessment.

- March 4, 2019 – initial coordination meeting with USFWS and the Pinckney National Wildlife Refuge
- June 25, 2019 - presentation of the preliminary range of alternatives and the criteria used to evaluate these alternatives
- July 23, 2019 – presentation of the preliminary alternative analysis and the proposed reasonable alternatives
- October 9, 2019 - presentation of the public input received at the September 19, 2019 PIM and to follow up on the reasonable alternatives
- January 30, 2020 – presentation to follow up on the reasonable alternatives, explain the three revisions to the reasonable alternatives based on public and agency input, and solicit comments from USFWS on the least impactful alternatives
- May 7, 2020 – presentation of the Recommended Preferred Alternative and Section 4(f)

At the May 7 meeting, 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.

11. Public Involvement

Public involvement activities, consistent with the specific requirements of 23 CFR 771.111, “early coordination, public involvement and project development” have occurred. A Letter of Intent (LOI) was distributed on September 4, 2018 by email to the resource and regulatory agencies to notify them of the initiation of the proposed project. FHWA and SCDOT are the Joint Lead Agencies and share the responsibility of identifying the status and level of agency involvement during the environmental process. This includes the identification of cooperating and participating Agencies. A full list of cooperating and

participating agencies can be found in Chapter 1 of the Environmental Assessment. Agency Coordination Effort (ACE) meetings are organized at key points in the project development process to keep agencies updated and to receive feedback throughout the project. Meeting summaries for all ACE meetings can be found in Appendix A of the Environmental Assessment.

Two public information meetings (September 27, 2018 and September 19, 2019) were held to communicate the project objectives with the public and to gather comments and recommendations about the project, possible impacts, and potential solutions.

The first public information meeting for the US 278 Corridor Improvements project was held on Thursday, September 27, 2018 from 6-8 p.m. the Hilton Head Island High School cafeteria. A total of 203 people attended the first public information meeting. total of 102 comments were received during the comment period. These include:

- 53 written responses at the meeting
- 17 website comments
- 13 mailed responses
- 16 emails (to both the project manager and the project email address)
- Three letters from the USFWS, Coastal Conservation League, and the Savannah Riverkeeper

The three letters from USFWS, Coastal Conservation League, and the Savannah Riverkeeper included the key themes specific to the Section 4(f) resources included the need for improvements, concern protecting the purposes of PINWR as well as the preservation of the natural environment, specifically wetlands and salt marsh areas.

The second public information meeting for the US 278 Corridor Improvements project was held on Thursday, September 19, 2019 from 5-7 p.m. in the gymnasium of the Boys & Girls Club of Hilton Head Island. A total of 330 people attended the second public information meeting. A total of 340 comments were received during the comment period which ended on October 25, 2019. These include:

- 43 written responses at the public information meeting held on September 19, 2019
- 247 website comments
- Five mailed comment forms
- 25 emails (to both Craig Winn and the project email address)
- Six Letters
- 14 written responses at the Hilton Head Island Open House held on October 17, 2019

Most comments specifically referencing PINWR, were in support of the proposed access improvements on PINWR including the C.C. Haigh, Jr. Boat Landing. Preservation of the natural environment on PINWR was a common theme in comments from both public information meetings; however, there is no public opposition to the proposed use of or mitigation to the Section 4(f) property. Documentation of public involvement efforts including the public meetings are included in Chapter 6 of the Environmental Assessment.

12. Summary and Approval

The proposed project meets all the applicability criteria set forth by FHWA's guidance for Programmatic Evaluation for Transportation Projects that have a Net Benefit to a Section 4(f) Property. All alternatives set forth in the subject programmatic were fully evaluated and the findings made are clearly applicable to this project. There are no feasible and prudent alternatives to the use or take from the Pinckney Island Wildlife Refuge. The project includes all possible planning to minimize harm. The Official with Jurisdiction, USFWS, concurs with this determination. SCDOT will include the measures to minimize harm as environmental commitments of the US 278 Corridor Improvements Environmental Assessment.

The environmental review, consultation and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by South Carolina Department of Transportation (SCDOT) pursuant to 23 U.S.C. 327.

SOURCES

1

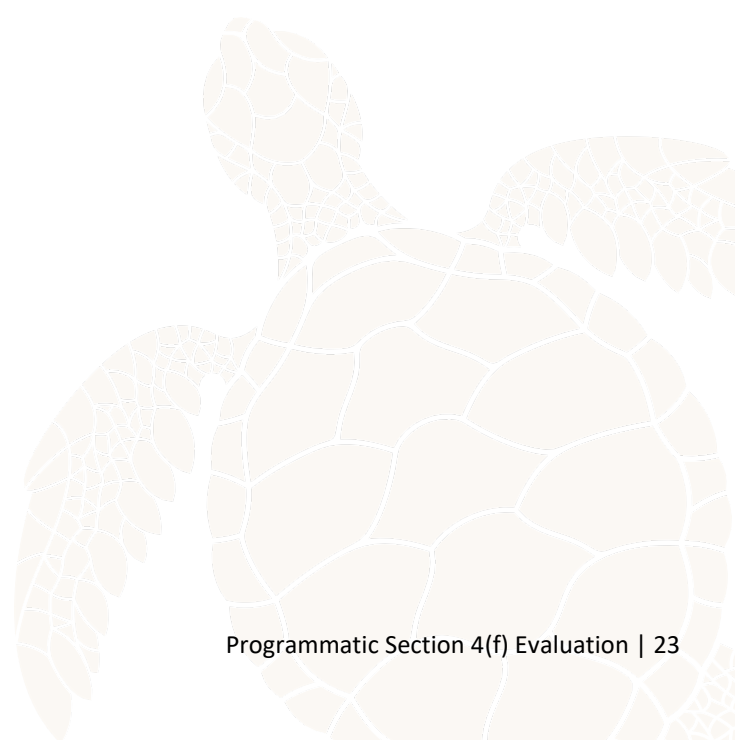
https://www.fws.gov/uploadedFiles/Region_4/NWRS/Zone_3/Savannah_Coastal_Refuges_Complex/2011%20Savannah%20Final%20CCP%20formatted.pdf

2 <https://www.beaufortcountysc.gov/archives/county-government/engineering/2009-wildlife-refuge-transportation-report.pdf>

3 <https://ecos.fws.gov/ServCat/DownloadFile/118159?Reference=76138>

[i] <https://www.beaufortcountysc.gov/archives/county-government/engineering/2009-wildlife-refuge-transportation-report.pdf>

[ii] <https://ecos.fws.gov/ServCat/DownloadFile/118159?Reference=76138>





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

South Carolina

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

November 5, 2020

In Reply Refer To:
HDA-SC

Electronic Correspondence Only
Mr. Russell Webb
Refuge Manager Pinckney Island NWR
USFWS
694 Beech Hill Lane
Hardeeville, SC 29927

Subject: Section 4(f) Net Benefit Analysis for Pinckney Island National Wildlife Refuge (PINWR).

Dear Mr. Webb:

The South Carolina Department of Transportation (SCDOT) in coordination with the Federal Highway Administration (FHWA) proposes to address structural deficiencies with the Mackay Creek Bridge and provide for corridor improvements along U.S. 278. The proposed project includes replacement of the eastbound Mackay Creek bridge and replacement of the three other bridges located within the project study area. The three additional bridges to be replaced 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 Lamp is also proposed as part of this project. Based on the access improvements at PINWR the requirements of Section 4(f) of the Department of Transportation Act of 1966 which provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development applies.

Early coordination with the USFWS and the PINWR staff has been integral to the project development process and how the improved access to and from PINWR would occur, minimize impacts, and maintain consistency with USFWS' management plan for PINWR. During the project development process, multiple alternatives for the interchange have been presented and reviewed by USFWS. These alternatives have been evaluated in the attached Programmatic Section 4(f) Analysis. Based on comments provided from the PINWR staff, the document has been revised.

Measures to minimize harm have been incorporated into the project's design that will ensure a benefit to both PINWR and SCDOT to include:

- Safety improvements including a new right-in/right-out interchange
- Adjusting the new U.S. 278 interchange to minimize (or eliminate) impacts to saltmarsh
- The recommended preferred alternative will remain on bridge structure crossing the refuge to minimize impacts

- Provide for an improved road system for the C.C. Haigh, Jr. Boat Landing
- Provide for accessibility to the landing during construction.
- Where applicable, portions of the abandoned U.S. 278 roadway and at-grade intersection on PINWR will be returned to the refuge.

Based on coordination to date, the proposed project meets all the applicability criteria set forth by FHWA's guidance for Programmatic Evaluation for Transportation Projects that have a Net Benefit to a Section 4(f) Property. All alternatives set forth in the subject programmatic were fully evaluated and the findings made are clearly applicable to this project. There are no feasible and prudent alternatives to the use or take from the Pinckney Island Wildlife Refuge. The project includes all possible planning to minimize harm. SCDOT will include the measures to minimize harm as environmental commitments as part of the U.S. 278 Corridor Improvements Environmental Assessment.

FHWA asks for your concurrence in this assessment as the Official with Jurisdiction over the Section 4(f) Property. If you concur, please sign below and return to Mr. Shane Belcher at jeffrey.belcher@dot.gov. We look forward to continued coordination with you as this project progresses. Please reach out to Mr. Belcher by e-mail or phone at 803-253-3187 with any questions you may have.

Sincerely,

**J. Shane
Belcher**

Digitally signed by J. Shane
Belcher
Date: 2020.11.05 13:47:32
-05'00'

(for) Emily O. Lawton
Division Administrator

Enclosures

ec: Mr. Will Meeks, USFWS Savannah Coastal Refuges Complex
Mr. David Kelly, SCDOT RPG 1 NEPA Coordinator
Mr. Craig Winn, SCDOT Program Manager

CONCURRENCE:

Signed: **WILLIAM WEBB** Digitally signed by WILLIAM WEBB
Date: 2020.12.01 12:44:03 -05'00' Date: _____
Mr. Russell Webb
Refuge Manager – Pinckney Island National Wildlife Refuge



FHWA South Carolina Division
Determination of Section 4(f) *De minimis* Use

State File #	P030450	Fed Project #		PIN	030450	Date	02/10/2021	County	Beaufort
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Project Description US 278 Corridor Improvements

Form Purpose: This form is based on FHWA regulations regarding Section 4(f) found at 23 CFR 774. The form is to be used when a determination of *de minimis* use is to be made for a Section 4(f) property.

Form Instructions: Fill out the form completely based on type of impact and attach the approval from the agency with jurisdiction over the Section 4(f) resource to the form. When multiple 4(f) properties are impacted by a project and a *de minimis* finding is to be made for each property, a separate form must be filled out for each property affected.

Document Type: EIS EA CE

Description of the Section 4(f) Resource:

The community of Stoney meets the criteria for a Traditional Cultural Property (TCP) as a site with significance in the areas of ethnic heritage, community planning and development, commerce and education. Furthermore, the TCP has been recommended eligible for the NRHP under Criterion A for Ethnic Heritage and Community Planning and Development. Stoney is a community of African American residents, who self identify as Gullah, native islanders or simply islanders, have owned land since the 1890s. The origins of the historic African American Gullah communities in Northwestern Hilton Head Island are rooted in the antebellum plantation settlements and succeeding freedmen’s community on the site in the decades after the Civil War. The TCP is approximately 300 acres and is roughly bounded by the tidal marshes of Skull, Jenkins, and Jarvis creeks to the north, south, east, and west.

Brief Description of Project Scope:

This Recommended Preferred Alternative (RPA) 4A for the project is approximately 4.11 miles long and includes widening the existing US 278 corridor to six lanes from Salt Marsh Drive to Mackay Creek bridge, building a new six-lane bridge over Mackay Creek and Skull Creek south of the existing US 278 alignment and connecting back to the existing US 278 corridor at the end of the existing Skull Creek bridges. A new right-in/right-out interchange will be constructed at the PINWR and C.C. Haigh, Jr. Boat Landing. The RPA 4A also widens the existing US 278 corridor to six-through lanes through Jenkins Island to Spanish Wells Road.

Within the Stoney TCP, the RPA 4A would widen US 278 from four to six lanes and improve three intersections, including the US 278 intersections with Squire Pope Road/Chamberlin Drive, Old Wild Horse Road, and Wild Horse Road/Spanish Wells Road.

Applicability Determination:

(to be applicable answers to all questions must be "yes")

I. For Public Parks, Recreation Areas, and Wildlife and/or Waterfowl Refuge:

1. Does the project involve a minor take of land from the resource? Yes No

a. Identify the total acreage of the resource: Acres

Section 4(f) *De minimis* Finding Use Form Continued:

b. Describe the use of the land from the resource and identify amount of the resource to be used (acres):

2. Does the project not adversely affect the qualities, activities, features, or other attributes of the resource that qualify it for protection under Section 4(f)? Yes No

3. Has the agency with jurisdiction over the resource concurred in writing with the FHWA's and/or SCDOT's determination that the project will not adversely affect the resource and is the concurrence attached? Yes No

a. Identify the agency with jurisdiction:

4. Has the agency with jurisdiction over the resource been informed of FHWA's and/or SCDOT's intent to make a *de minimis* finding? Yes No

b. If yes, attach the correspondence. Correspondence attached? Yes No

5. Has the public been afforded an opportunity to review and comment on the effects of the project on the protected activities, features, and attributes of the resource? Yes No

a. Identify the opportunity for public comment:

II. For Historic Properties:

1. Does the project have a "No Adverse Effect" or a "No Historic Properties Affected" on the historic property as defined by Section 106 of the National Historic Preservation Act and its regulations? Yes No

a. Identify the effects determination for the resource:

No Adverse Effect

b. Describe the use of land from resource and identify the amount of the resource to be used (acres):

The project, as proposed, would involve the acquisition of approximately 4.77 acres of new right-of-way and the relocation of two commercial establishments from within the TCP boundary. The right-of-way required constitutes roughly one-and-a-half percent of the acreage of the entire TCP area and is located along existing roadways within the TCP. The acquisition is minimal in nature, has no impacts on the integrity or the district, and does not substantially change the character, setting, or feel of the Stoney TCP. No additional use of the property is proposed.

2. Has the SHPO and ACHP, if participating in the Section 106 consultation, concurred in writing with the effects determination? Yes No

- a. If so, attach the written concurrence. Concurrence attached? Yes No
(Receipt of the SHPO's concurrence with the FHWA's finding, or a non-response after the specific time qualifies as the necessary correspondence from the official with jurisdiction over Section 106 properties).
3. Has the SHPO and ACHP, if participating in the Section 106 consultation, been informed of FHWA's and/or SCDOT's intent to make a *de minimis* impact/no adverse finding based on their written concurrence in the Section 106 determination? Yes No
- a. If yes, attach correspondence. Correspondence attached? Yes No
4. Have the views of the consulting parties participating in the Section 106 consultation been considered? Yes No
- a. Attach any relevant correspondence and any necessary responses to consulting party comments. Correspondence attached? Yes No

III. Alternatives Analysis:

1. Summarize why the use of the property from the resource cannot be avoided.

- Project needs would not be met.

Explain:

The purpose of this project is to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the corridor. Additional right-of-way is necessary from the TCP to accommodate the additional lanes and intersection improvements necessary to reduce congestion. All build alternatives would require additional right-of-way from the TCP. The Recommended Preferred Alternative 4A was selected as the least damaging to the Stoney community of all alternatives considered.

- Substantial impacts to other environmental/cultural/social resources would result.

Explain:

Alternatives were considered that would avoid the TCP; however, these alternatives would result in egregious impacts to natural resources. These alternatives were not considered Reasonable and eliminated. Other Reasonable Alternatives made new "cuts" through the TCP in areas that are presently undisturbed. These alternatives were eliminated due to the increased impact on Stoney.

- Project complexity would increase resulting in greater construction and maintenance costs.

Explain:

- Other.

Explain:

2. Summarize the measures to minimize harm. This would include, if applicable, any mitigation measures.

The SCDOT would only obtain right-of-way that is necessary to accommodate the project, and is limited to property located along existing roadways within the TCP. The acquisition is minimal in nature, has no impacts on the integrity or the district, and does not substantially change the character, setting, or feel of the Stoney TCP.

As the Stoney community has the character of a semi-rural Lowcountry area, SCDOT is committed to retaining as much existing vegetation and tree canopy within the Stoney community as possible. A tree canopy section along Squire Pope Road will be maintained through minimization efforts to reduce the proposed project footprint. These measures may include relocating the proposed multi-use trail to avoid impacting trees and consulting with an arborist to identify measures to reduce impacts to the adjacent trees.

IV. Summary and Determination:

The project involves a *de minimis*/no adverse use on the Section 4(f) property as evidence with a "No Adverse Effect" finding from the SHPO or as evidence through the minimization of harm to a public park, recreation land or wildlife and waterfowl refuge as a result of mitigation to or avoidance of impacts to the qualifying characteristics and/or the functions of the resource.

Based on the scope of the undertaking; the fact that the undertaking does not adversely affect the function/qualities of the Section 4(f) resource on a permanent or temporary basis; and with agreement from the official with jurisdiction, the proposed action constitutes a *de minimis*/no adverse use and the alternatives analysis is considered satisfied.

Preparer:

Date:

Program Manager:

Date:

Environmental Manager:

Date:

FHWA:

Date:



South Carolina
Department of Transportation

BEAN
31744
AE

May 28, 2021

Ms. Elizabeth Johnson
Deputy State Historic Preservation Officer
SC Department of Archives and History
8301 Parklane Road
Columbia, SC 29223

Subject: US 278 Corridor Improvements Cultural Resources

Dear Ms. Johnson:

The South Carolina Department of Transportation (SCDOT) in coordination with the Federal Highway Administration (FHWA) proposes to address structural deficiencies with the Mackay Creek Bridge and provide for corridor improvements along U.S. 278. The proposed project includes replacement of the eastbound Mackay Creek Bridge and replacement of the three other bridges located within the project study area. The three additional bridges to be replaced 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 Lamp is also proposed as part of this project. The following is a summary of the cultural resources identified on the project.

Archaeological Site 38BU66

The preferred alternative could not avoid this site located on PINWR, resulting in an Adverse Effect to this historic resource. Mitigation through data recovery will be completed. SCDOT proposes to mitigate impacts through an effort to excavate, preserve, and document the presence and characteristics of any buried features on the site within the area of the proposed improvements. SCDOT also proposes to provide a public education component developed in coordination with the SHPO, USFWS, and the Catawba Tribal Historic Preservation Office that will be outlined in the Archaeological Memorandum of Agreement (MOA).

Archaeological Site 38BU67 & 38BU2337

The preferred alternative avoids impacts to these sites. Due to the close proximity of 38BU67, the boundaries of the site will be identified as a "Restricted Area" on all construction plans. Construction, heavy equipment access, or storage for equipment and materials will not be allowed within the Restricted Area. If any inadvertent damage occurs to the site, or any late archaeological manifestations are discovered, reports will be made to SHPO, the Catawba Indian Nation THPO, and USFWS Regional Historic Preservation Officer. SCDOT's commitments also include that if any significant portions of the site are encountered, construction activities in that area will be halted and it will be treated as a late discovery. A MOA covering these precautionary avoidance measures has been prepared with FHWA, SCDOT, USFWS, Catawba Indian National THPO, and SHPO as signatories.



Stoney Community Traditional Cultural Property (TCP)

Oral history interviews with longtime residents, archival research, and historical landscape analysis were carried out to better understand the Stoney Community's significance as a TCP and to evaluate its eligibility for listing in the NRHP. Stoney is one of Hilton Head Island's historic and socially connected Gullah communities, which also include nearby Squire Pope, Spanish Wells, Jonesville, and Jarvis. Study of Stoney and the surrounding historic Gullah communities that are located along Jarvis and Skull creeks in Northwest Hilton Head Island, along with oral histories provided by knowledgeable residents, suggest that Stoney remains central to Gullah identity through its long history of Black landownership; as a cultural gateway to the island; and as a place of progress, prosperity, and education for the island's Black community. It is thus recommended eligible for the National Register of Historic Places as a TCP and a site boundary has been created

The proposed preferred alternative would involve the acquisition of approximately 4.77 acres of new right-of-way (ROW) and the relocation of two commercial establishments from within the TCP boundary, constituting roughly one-and-a-half percent of the acreage of the entire TCP area. The preferred alternative was selected as the least environmentally damaging of all alternatives considered. The alternatives that avoided the Stoney Community had egregious impacts to natural resources and/or construction costs that eclipsed the available funding for the project. Other alternatives made new "cuts" through the Stoney Community in areas that are presently undisturbed (see attached roadway alternatives graphic). The preferred alternative was selected due to its feasibility in terms of cost constraints and its minimization of impacts to both the natural environment and the Stoney Community.

The proposed project is not expected to induce growth within the Stoney Community or introduce additional traffic into the area. The proposed project seeks to change an existing section of four (4)-lane roadway on US 278 to six (6) lanes. There are existing 6 lane sections on either side of the proposed project area, so the project only seeks to standardize the facility throughout the US 278 corridor rather than expanding US 278 to introduce increased traffic demand, a reactive rather than proactive strategy to address an existing need on the roadway and an existing deficiency that underserves that need.

As the Stoney Community has the character of a semi-rural Lowcountry area, SCDOT is committed to retaining as much existing vegetation and tree canopy within the Stoney Community as possible. Along US 278, strips of new ROW will require some tree/vegetation clearing in order to construct the project. However, those areas are buffered by additional wooded areas further off the alignment of the existing (and proposed) US 278, with the result that the loss of vegetation should not be impactful to the character of the Stoney Community. A tree canopy section along Squire Pope Road will be maintained through minimization efforts to reduce the proposed project footprint. If potential effects to this tree canopy area along Squire Pope Road arise in later project planning, SCDOT will consult with SHPO for a renewed determination of effect.

Potential community enhancement options were initially developed based on recommendations presented in the Background and Recommendations Report for the Gullah Geechee Cultural Preservation Project (draft 2019) prepared by the Walker Collaborative. This document provides



recommendations for strategies to better preserve Gullah cultural on Hilton Head Island. In September 2019, the Hilton Head Island Town Council approved 13 of the recommendations, which address land preservation, economic opportunities and Town regulations. The project team has met with the Stoney Community, Gullah stakeholders, and the Town of Hilton Head on five different occasions since August 2020 to discuss the project and potential enhancement opportunities (see attached meeting summary). Initial discussions included the potential enhancement options derived from the background research and have evolved based on input from the Stoney Community.

It is the goal of the proposed project to provide community enhancement options to preserve and highlight the history of the Stoney Community. Potential enhancement options to further establish or reestablish the Stoney Community as a “gateway” and a “place” include:

- Signage to demarcate the Stoney Community to include a more “gateway” entrance/exit to the community based on the boundary established in the TCP Report.
- Open-air pavilion on town-owned property near the US 278 and Squire Pope Road intersection to highlight history of the Stoney Community and other Gullah neighborhoods on the island
- Create a theme based street and multiuse path lighting
- Transform the History of Stoney community video to a “Story Map” to share important historical information about the Stoney Community, Gullah Communities, and Hilton Head Island. This would be an online interactive map to provide locations and details about historically significant sites, people, and events within the area. Users can learn about the history of the project area and its inhabitants, and historic homes inhabited by early settlers, early roads, farms, industry, cemeteries and other features to document the area’s history.
- Improvements to access road to Jenkins Island Cemetery

SCDOT, FHWA, and the larger US 278 Project Team conducted a virtual meeting with Gullah Geechee Heritage Corridor Commission and South Carolina SHPO staff on May 25, 2021. A project overview and explanation of outreach to and enhancements for the Stoney Community was provided during the meeting. Subsequent to that meeting, the Gullah Geechee Heritage Corridor Commission issued a response letter (attached) stating “we register no objection to the current, revised plan and look forward to continued updates on the progress.”

The proposed US 278 project will acquire ROW within the boundary of the Stoney Community TCP but this acquisition is minimal in nature, has no impacts to the integrity or the district, and does not substantially change the character, setting, or feel of the Stoney community TCP. Based upon those conclusions, it is recommended that the proposed US 278 project will have No Adverse Effect to the Stoney Community TCP. FHWA intends to make a 4(f) de minimis impact finding for the minimal impacts within the Stoney Community TCP.



Conclusions

In summary, the proposed US 278 project will have an Adverse Effect to historic resources due to impacts to site 38BU66. A MOA (attached) will be completed to address mitigation for those impacts. The FHWA has notified the Advisory Council for Historic Preservation (ACHP) of the project's adverse effect and the ACHP has stated that they do not need to be a consulting party on this project.

In accordance with the memorandum of agreement approved by the Federal Highway Administration, November 29, 2011, SCDOT is providing this information as agency official designee, as defined under 36 CFR 800.2, to ensure compliance with Section 106 of the National Historic Preservation Act.

It is requested that you review the enclosed material and, if appropriate, indicate your concurrence with SCDOT findings. Please respond within 30 days if you have any objections or if you have need of additional information.

Please let me know if you have any questions.

Sincerely,



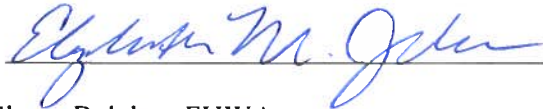
David P. Kelly
RPG 1 NEPA Coordinator

DPK:dk

Enclosures: Stoney Community TCP Report, Alternatives Alignment Graphic, Stoney Community Meeting Summary, US 278 Cultural Resources Survey Report, Community Enhancement Memo, Community Enhancement Rendering, Gullah Geechee Heritage Corridor Commission response, and Project MOA

I (~~do not~~) concur in the above determination.

Signed:



Date:




6/1/2021

cc: Shane Belcher, FHWA
LeeAnne Wendt, Muscogee (Creek) Nation
Brett Barmes, Eastern Shawnee
Rick Kanaski, USFWS

cc: Wenoniah Haire, Catawba Nation THPO
Keith Derting, SCIAA



Legend

-  Proposed Right-Of-Way
- Stoney Traditional Cultural Property Parcels**
-  Parcels Not Impacted by Right-of-Way
-  Parcels Impacted by Right-of-Way

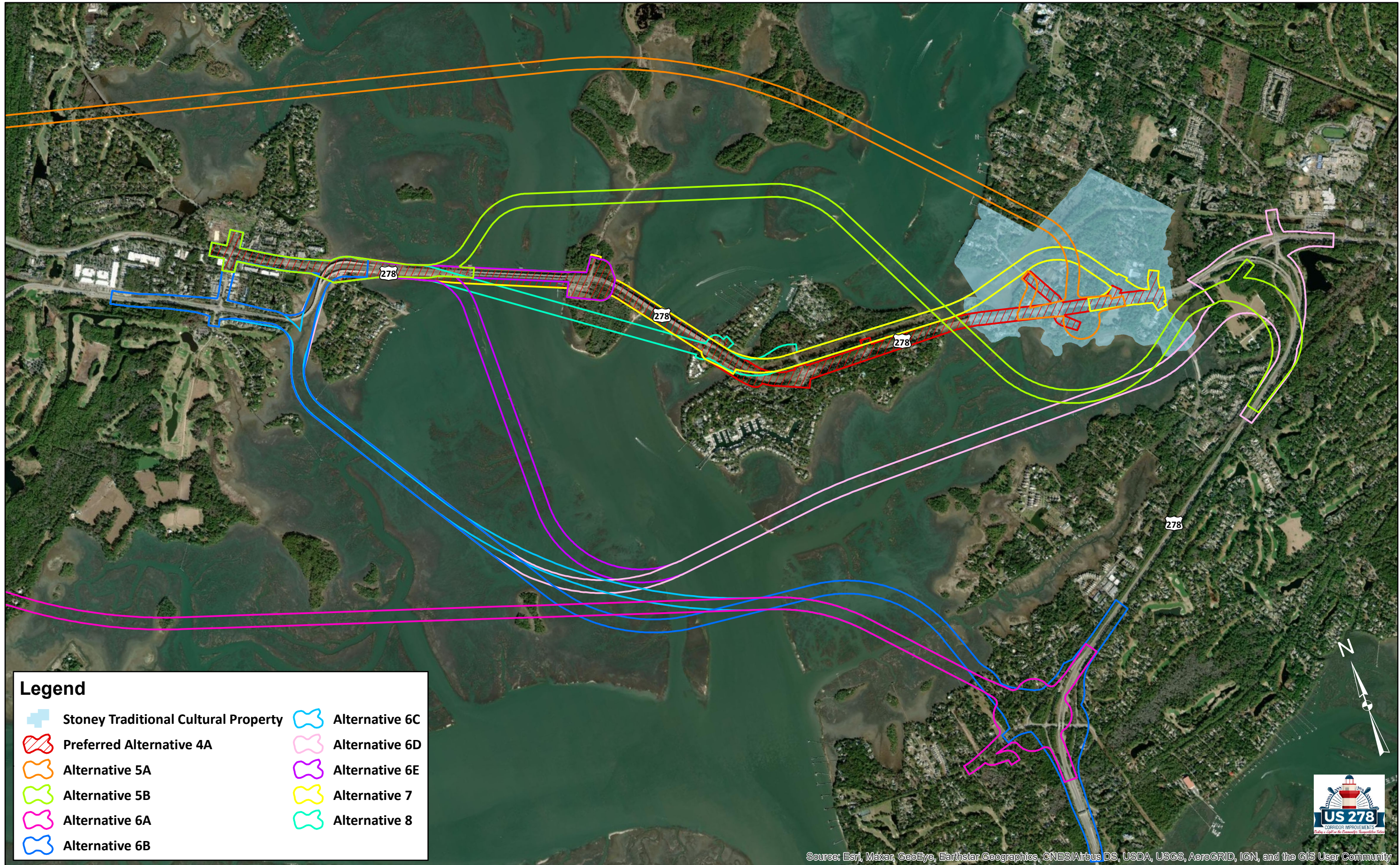
Lot #	Property Owner	Total Acreage	Needed ROW	Percent
1	DRIESSEN BENJAMIN	1.286	0.005	0.37%
2	CHARLES E SIMMONS JR AND ROSA G SIMM	0.213	0.033	15.39%
3	DRIESSEN DELORES	0.825	0.025	3.00%
4	TOWN OF HILTON HEAD ISLAND SC	0.398	0.021	5.39%
5	DRIESSEN BENJAMIN	0.399	0.027	6.81%
6	TOWN OF HILTON HEAD ISLAND	0.199	0.016	7.86%
7	WAMPLER SYLVIA	0.200	0.017	8.42%
8	TOWN OF HILTON HEAD (THE)	0.400	0.023	5.79%
9	TOWN OF HILTON HEAD ISLAND	0.397	0.069	17.44%
10	WHITE AMELIA HRS OF % JACOB DRIESSEN	23.294	0.015	0.06%
11	STEWART BENJAMIN	0.970	0.097	10.01%
12	FERGUSON CORA L S	0.442	0.078	17.56%
13	ALZHEIMER'S RESPITE & RESOURCE	0.632	0.087	13.81%
14	TOWN OF HILTON HEAD ISLAND SC	2.983	0.498	16.70%
15	TOWN OF HILTON HEAD ISLAND SC	0.141	0.132	93.72%
16	NORTH SIDE PARK LLC	1.052	0.052	4.91%
17	ROBINSON MARY L S LIFE-EST INABNETT	0.554	0.035	6.39%
18	STEWART JOHN	0.834	0.065	7.77%
19	STEWART WILLIAM	0.761	0.046	6.07%
20	BRYAN LAWRENCE R SAMUEL SR EDDIE JR	1.136	0.037	3.27%
21	RICHARD L DUNCAN REVOC TRUST	18.549	0.169	0.91%
22	TOWN OF HILTON HEAD ISLAND	12.363	0.079	0.64%
23	TOWN OF HILTON HEAD ISLAND	0.332	0.028	8.43%
24	DRIESSEN ALICE R	0.599	0.060	10.02%
25	TOWN OF HILTON HEAD ISL (THE)	4.829	0.081	1.68%
26	HIP PARTNERS	0.334	0.067	19.97%
27	TOWN OF HILTON HEAD ISLAND SOUTH CAR	1.734	0.096	5.56%
28	GORDON CAROL P DAVIS BEVERLY WASHING	0.166	0.062	37.18%
29	JOHNSON ERNESTINE ETAL	0.751	0.061	8.18%
30	TAYLOR DOROTHY W HAROLD	0.771	0.032	4.19%

31	TOWN OF HILTON HEAD ISLAND	3.386	0.400	11.80%
32	TOWN OF HILTON HEAD ISLAND	3.825	0.392	10.24%
33	ATLAS SHRUGGED LLC	0.857	0.091	10.67%
34	TOWN OF HILTON HEAD ISL SC	0.550	0.113	20.62%
35	TOWN OF HILTON HEAD ISL SC	6.165	0.544	8.82%
36	TOWN OF HILTON HEAD ISL SC THE	2.341	0.364	15.55%
37	MEGR LLC	0.932	0.316	33.91%
38	TOWN OF HILTON HEAD ISLAND	2.210	0.029	1.30%
39	BERRY DAVID H LINDA T JTROS	0.492	0.030	6.13%
40	WILLIAMS EDWARD N TRUSTEE EDWARD N W	2.354	0.057	2.42%
41	TOWN OF HILTON HEAD ISLAND	2.207	0.047	2.13%
42	FAIRFIELD SQUARE HILTON HEAD LLC	1.979	0.016	0.81%
43	TOWN OF HILTON HEAD ISLAND BEAUFORT	2.927	0.215	7.35%
44	TOWN OF HILTON HEAD ISLAND	4.915	0.042	0.85%
45	WASHINGTON AMANDA	1.149	0.001	0.06%
ALL OTHER STONEY TCP PARCELS		186.240	0.000	0.00%
Totals		300.071	4.770	1.59%












Lot #11 - Relocation
Card and Palm Readings

Lot #28 - Relocation
Wiley's Upholstery Shop

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



Legend

 Stoney Traditional Cultural Property	 Alternative 6C
 Preferred Alternative 4A	 Alternative 6D
 Alternative 5A	 Alternative 6E
 Alternative 5B	 Alternative 7
 Alternative 6A	 Alternative 8
 Alternative 6B	

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



FHWA South Carolina Division
Determination of Section 4(f) *De minimis* Use

State File #	P030450	Fed Project #		PIN	030450	Date	04/13/2021	County	Beaufort
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Project Description

Form Purpose: This form is based on FHWA regulations regarding Section 4(f) found at 23 CFR 774. The form is to be used when a determination of *de minimis* use is to be made for a Section 4(f) property.

Form Instructions: Fill out the form completely based on type of impact and attach the approval from the agency with jurisdiction over the Section 4(f) resource to the form. When multiple 4(f) properties are impacted by a project and a *de minimis* finding is to be made for each property, a separate form must be filled out for each property affected.

Document Type: EIS EA CE

Description of the Section 4(f) Resource:

A community park, owned jointly by the Town of Hilton Head Island and Beaufort County, is located at 152 William Hilton Parkway. The property is located along the southern side of US 278, south of the intersection with Old Wild Horse Road. The park provides tennis and basketball courts that are open to the public. A gravel parking area is also provided.

Brief Description of Project Scope:

The Recommended Preferred Alternative (RPA) 4A for the project is approximately 4.11 miles long and includes widening the existing US 278 corridor to six lanes from Salt Marsh Drive to Mackay Creek bridge, building a new six-lane bridge over Mackay Creek and Skull Creek south of the existing US 278 alignment and connecting back to the existing US 278 corridor at the end of the existing Skull Creek bridges. A new right-in/right-out interchange will be constructed at the PINWR and C.C. Haigh, Jr. Boat Landing. The RPA 4A also widens the existing US 278 corridor to six-through lanes through Jenkins Island to Spanish Wells Road.

Specifically in the area of the park, the project would construct a loon, or bump-out, to provide adequate turning radii for vehicles performing a U-turn at Old Wild Horse Road.

Applicability Determination:

(to be applicable answers to all questions must be "yes")

I. For Public Parks, Recreation Areas, and Wildlife and/or Waterfowl Refuge:

1. Does the project involve a minor take of land from the resource? Yes No

a. Identify the total acreage of the resource: Acres

Section 4(f) *De minimis* Finding Use Form Continued:

b. Describe the use of the land from the resource and identify amount of the resource to be used (acres):

Use of the land would include the acquisition of approximately 0.22 acre from the resource, and the construction of roadway elements. As described above, a bump-out would be constructed on the property to provide adequate turning radii for vehicles performing a U-turn at Old Wild Horse Road. The portion of the property proposed to be acquired for the project is currently landscaped. No parking or other park facilities will be impacted.

2. Does the project not adversely affect the qualities, activities, features, or other attributes of the resource that qualify it for protection under Section 4(f)? Yes No

3. Has the agency with jurisdiction over the resource concurred in writing with the FHWA's and/or SCDOT's determination that the project will not adversely affect the resource and is the concurrence attached? Yes No

a. Identify the agency with jurisdiction:

Town of Hilton Head Island and Beaufort County

4. Has the agency with jurisdiction over the resource been informed of FHWA's and/or SCDOT's intent to make a *de minimis* finding? Yes No

b. If yes, attach the correspondence. Correspondence attached? Yes No

5. Has the public been afforded an opportunity to review and comment on the effects of the project on the protected activities, features, and attributes of the resource? Yes No

a. Identify the opportunity for public comment:

The public will be provided the opportunity to comment on the potential impacts to the resource at the Public Hearing.

II. For Historic Properties:

1. Does the project have a "No Adverse Effect" or a "No Historic Properties Affected" on the historic property as defined by Section 106 of the National Historic Preservation Act and its regulations? Yes No

a. Identify the effects determination for the resource:

b. Describe the use of land from resource and identify the amount of the resource to be used (acres):

2. Has the SHPO and ACHP, if participating in the Section 106 consultation, concurred in writing with the effects determination? Yes No

- a. If so, attach the written concurrence. Concurrence attached? Yes No
(Receipt of the SHPO's concurrence with the FHWA's finding, or a non-response after the specific time qualifies as the necessary correspondence from the official with jurisdiction over Section 106 properties).
3. Has the SHPO and ACHP, if participating in the Section 106 consultation, been informed of FHWA's and/or SCDOT's intent to make a *de minimis* impact/no adverse finding based on their written concurrence in the Section 106 determination? Yes No
- a. If yes, attach correspondence. Correspondence attached? Yes No
4. Have the views of the consulting parties participating in the Section 106 consultation been considered? Yes No
- a. Attach any relevant correspondence and any necessary responses to consulting party comments. Correspondence attached? Yes No

III. Alternatives Analysis:

1. Summarize why the use of the property from the resource cannot be avoided.

- Project needs would not be met.

Explain:

The purpose of this project is to address structural deficiencies at the existing eastbound Mackay Creek bridge and reduce congestion within the corridor. Additional right-of-way is necessary from the park to accommodate the roadway improvements necessary to reduce congestion.

- Substantial impacts to other environmental/cultural/social resources would result.

Explain:

- Project complexity would increase resulting in greater construction and maintenance costs.

Explain:

- Other.

Explain:

2. Summarize the measures to minimize harm. This would include, if applicable, any mitigation measures.

The SCDOT would only obtain right-of-way that is necessary to accommodate the project. The acquisition would not impact parking or other park facilities. Furthermore, the acquisition of property from the park would not affect the qualities, activities, features, or other attributes of the park.

To maintain pedestrian access to the park, the SCDOT proposes to replace the existing sidewalk along US 278 to the south side of the bump-out. A shared-use path will also be constructed along the north side of US 278 to provide enhanced access to the park.

IV. Summary and Determination:

The project involves a *de minimis*/no adverse use on the Section 4(f) property as evidence with a "No Adverse Effect" finding from the SHPO or as evidence through the minimization of harm to a public park, recreation land or wildlife and waterfowl refuge as a result of mitigation to or avoidance of impacts to the qualifying characteristics and/or the functions of the resource.

Based on the scope of the undertaking; the fact that the undertaking does not adversely affect the function/qualities of the Section 4(f) resource on a permanent or temporary basis; and with agreement from the official with jurisdiction, the proposed action constitutes a *de minimis*/no adverse use and the alternatives analysis is considered satisfied.

Preparer:

Date:

Program Manager:

Date:

Environmental Manager:

Date:

FHWA:

Date:

February 3, 2021

Josh Gruber
Interim Town Manager
Town of Hilton Head Island
One Town Center Court
Hilton Head Island, SC 29928

Re: Acquisition of +/- 0.22 acre of right-of-way from the public park located at 152 William Hilton Parkway as part of SCDOT's US 278 Corridor Improvement Project.

State ID: P030450

Dear Mr. Gruber:

The South Carolina Department of Transportation (SCDOT) and Beaufort County, in coordination with the Federal Highway Administration (FHWA), propose improvements to the US 278 corridor between Bluffton and Hilton Head Island in Beaufort County. An environmental document (Environmental Assessment) is being developed that will document the potential for beneficial and negative impacts to both the human and natural environment due to the project. The potential impacts of the project are also being evaluated pursuant to Section 4(f), a provision of federal transportation law at Title 49, USC 303 that affords certain protections to public parks, historic sites, and wildlife refuges.

The proposed project would widen the existing US 278 corridor to six (6) lanes from Salt Marsh Drive to Spanish Wells Road. The project would also improve pedestrian facilities from Moss Creek Drive to Salt Marsh Drive, replace deficient bridges in the corridor, construct a new right-in/right-out interchange at the Pickney Island National Wildlife Refuge, and improve intersections within the corridor.

The project team considered a total of 14 different types of intersection designs to improve performance of the Squire Pope Road and Spanish Wells Road intersections with US 278. The proposed intersection alternative is recommended based its projected beneficial traffic performance, impacts to the surrounding natural environment, potential residential and commercial relocations, and cost.

The proposed intersection alternative would consolidate eastbound left-turning movements from both Squire Pope Road and Spanish Wells Road to a signalized intersection at Old Wild Horse Road. Additionally, the westbound US 278 traffic travelling to Spanish Wells Road would pass through the intersection and complete a U-turn at the new Old Wild Horse Road signal. Now travelling eastbound, this traffic would turn right onto Spanish Wells Road. In order for heavy trucks to make this U-turn, a loon, also called a bump-out, would be constructed to provide adequate turning radii. The loon would require the acquisition of new right-of-way (ROW) from the public park located at 152 William Hilton Parkway, directly south of Old Wild Horse Road. Specifically, the project would require 0.22 acre of ROW from the parcel that provides parking for the park (see attached location maps).

As a public park, the resource is afforded special protection under Section 4(f). If the proposed transportation facility could result in adverse effects to the resource, the transportation agency must conduct an evaluation to demonstrate that there is no prudent and feasible alternative to the use of the property under the provisions of Section 4(f). An exemption is provided in cases where the official with jurisdiction over the park/historic

site/wildlife refuge concurs in a demonstration that the impacts are not adverse. This concurrence enables FHWA to make a *de minimis* (minimal impact) finding, which satisfies the requirements of Section 4(f). *De minimis* impacts on publicly-owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not “adversely affect the activities, features and attributes” of the Section 4(f) resource. Thus, the purpose of this letter is to request your concurrence that the proposed improvements to US 278 will not adversely affect the activities, features, and attributes of this public park, thus allowing the FHWA to make a *de minimis* impact finding.

SCDOT is seeking your concurrence with the *de minimis* finding for inclusion in the Environmental Assessment for the proposed project. If you concur that the minimal impact on the park as shown on the attached exhibits would not adversely affect the recreational activities, features, and attributes that qualify the park under Section 4(f), SCDOT requests that you please sign and date this letter in the spaces below. In addition to your concurrence, the SCDOT will provide the public an opportunity to review and comment on the effects of the project on the Section 4(f) resource prior to the FHWA making a final determination.

As the official with jurisdiction over the park located at 152 William Hilton Parkway, I concur with the determination that the proposed transportation project as described in this letter and shown on the accompanying attachments would not adversely affect the activities, features, and attributes that qualify the park for protection under Section 4(f). I have also been informed that, based on my concurrence, the FHWA intends to make a de minimis finding regarding impacts to the park, thus satisfying the requirements of Section 4(f).

Signature: _____ Date: _____

Print Name and Title: _____

Following signing and dating of this letter, please return a copy within 15 days of the date of this letter to the following contact/address below:

South Carolina Department of Transportation
Attn: David Kelly
P.O. Box 191
Columbia, SC 29202
KellyDP@scdot.org

Your expeditious handling of this concurrence will be appreciated. Should you have any immediate questions, please contact me at 803-737-1645.

Sincerely,

David Kelly
RPG 1 NEPA Coordinator

cc: Craig Winn, PE, SCDOT
Megan Groves, SCDOT
Shane Belcher, FHWA

Enclosures: Location Maps, Plan Sheets

February 3, 2021

Jared Fralix
Assistant County Administrator
Beaufort County Engineering
100 Ribaut Road
Beaufort, SC 29902

Re: Acquisition of +/- 0.22 acre of right-of-way from the public park located at 152 William Hilton Parkway as part of SCDOT's US 278 Corridor Improvement Project.

State ID: P030450

Dear Mr. Fralix:

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Signature: Jared Fralix Date: 6/14/21

Print Name and Title: Jared Fralix / Asst. County Administrator - Engineering

Following signing and dating of this letter, please return a copy within 15 days of the date of this letter to the following contact/address below:

South Carolina Department of Transportation
Attn: David Kelly
P.O. Box 191
Columbia, SC 29202
KellyDP@scdot.org

Your expeditious handling of this concurrence will be appreciated. Should you have any immediate questions, please contact me at 803-737-1645.

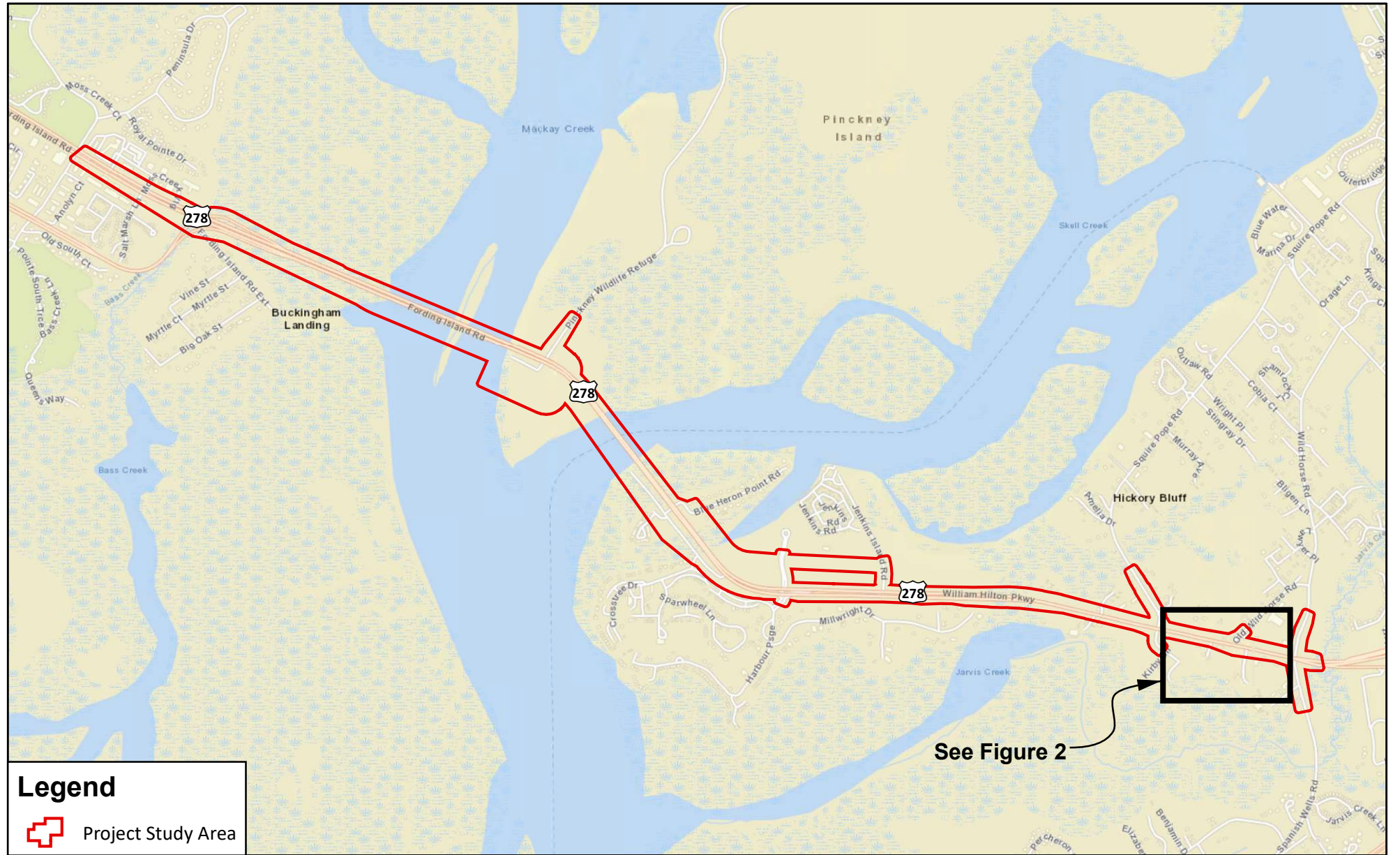
Sincerely,

David P. Kelly

David Kelly
RPG 1 NEPA Coordinator

ec: Craig Winn, PE, SCDOT
Megan Groves, SCDOT
Shane Belcher, FHWA

Enclosures: Location Maps, Plan Sheets



Legend

 Project Study Area



Prepared For:



US 278 Corridor Improvements

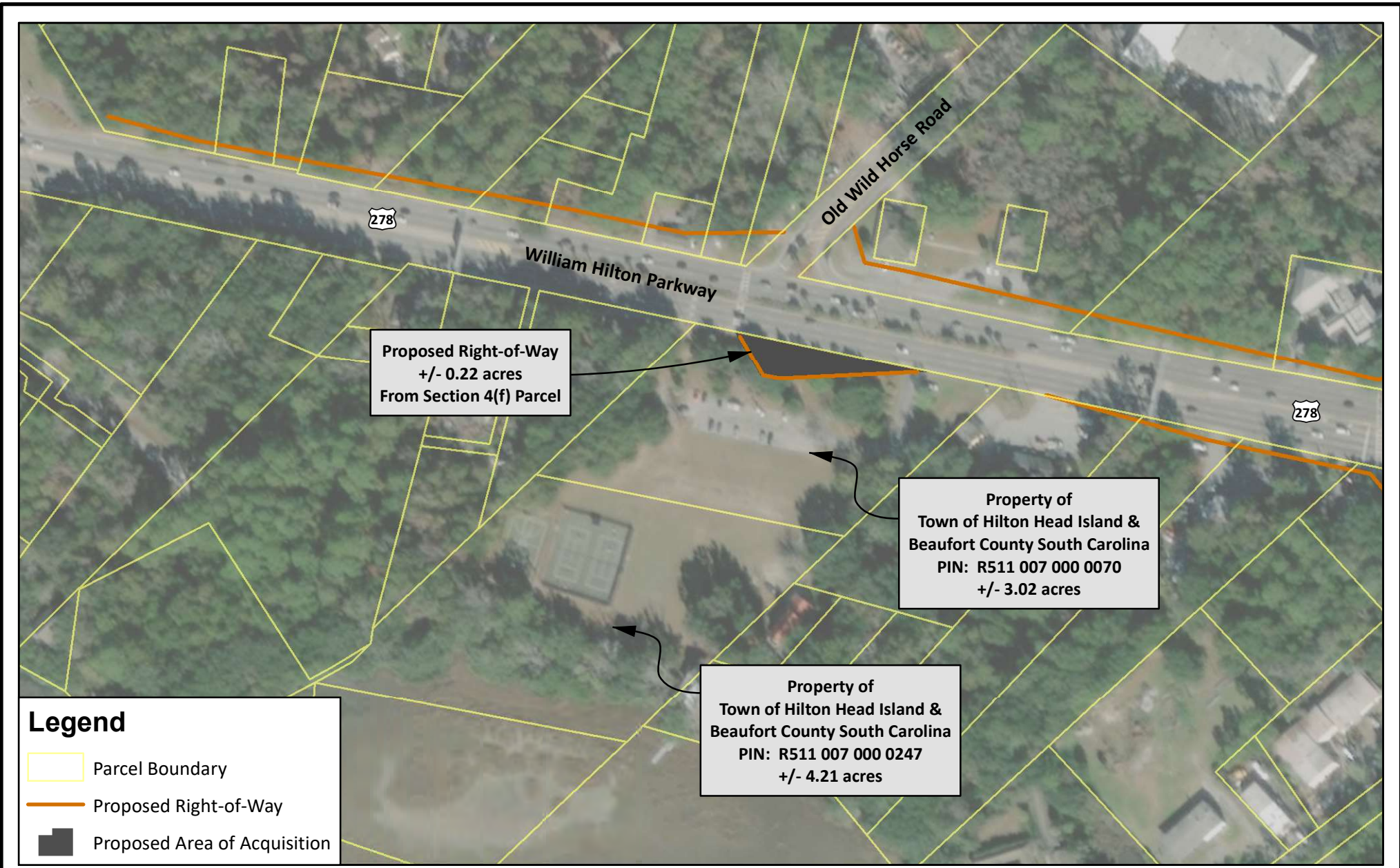
Section 4(f) Resources

Beaufort County, SC

Date: February 1, 2021	
Scale: 1 inch = 200 feet	
Job No.: P030450	
Drawn By: MTD	Checked By: HMR

Figure

1



Prepared For:



US 278 Corridor Improvements

Section 4(f) Resources

Beaufort County, SC

Date: February 1, 2021

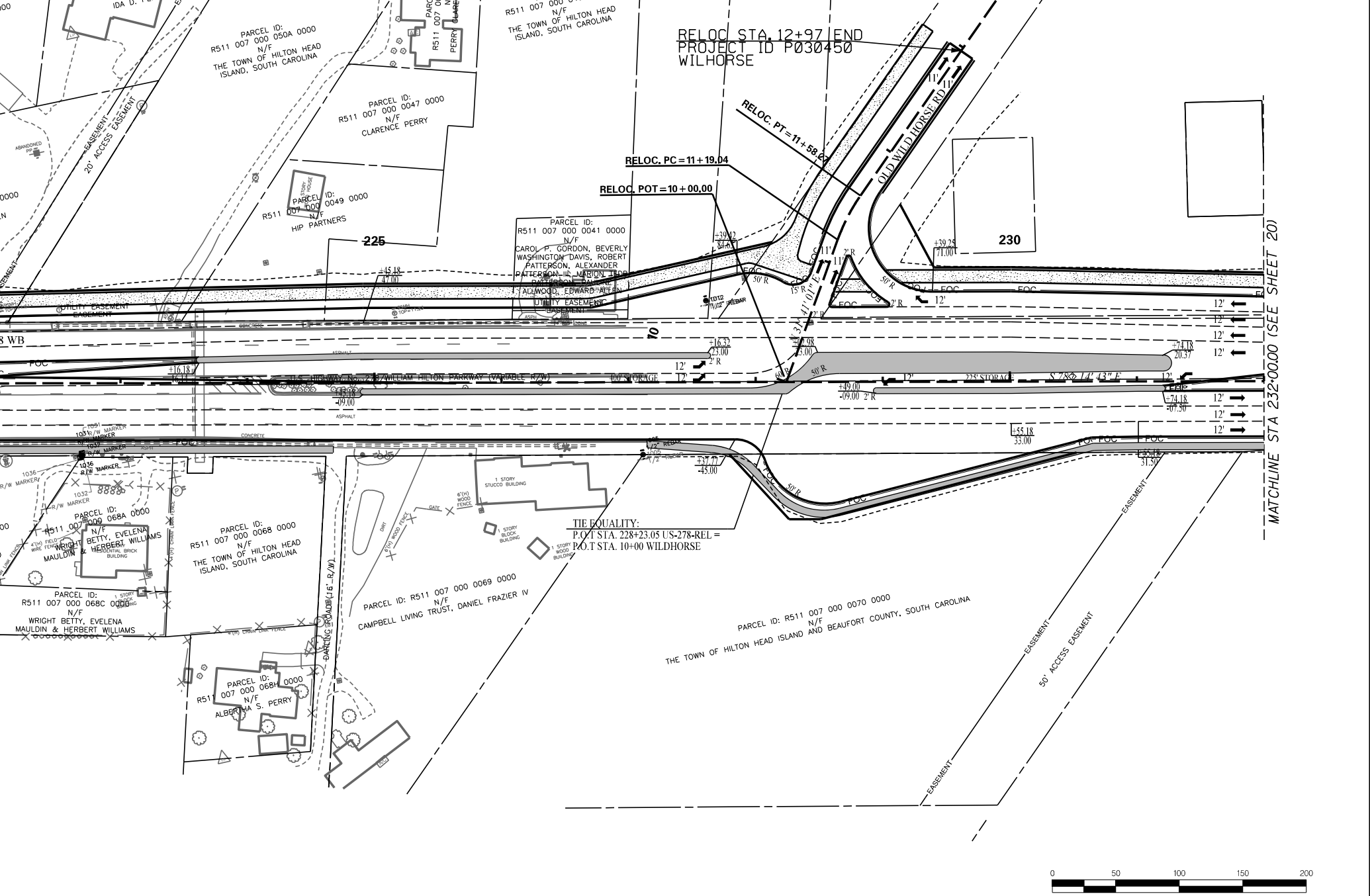
Scale: 1 inch = 200 feet

Job No.: P030450

Drawn By: MTD Checked By: HMR

Figure

2



MATCHLINE STA 232+00.00 (SEE SHEET 20)



PLANS PREPARED BY:

4600 PARK ROAD, SUITE 240
CHARLOTTE, NC 28209
COA # 402

30% PLANS SUBMITTAL
NOT FOR CONSTRUCTION

4			
3			
2			
1			
REV. NO.	BY	DATE	DESCRIPTION OF REVISION
TOPO.		DATE	
DWG.		DATE	GROUP
R/W		DATE	

SOUTH CAROLINA
DEPARTMENT OF TRANSPORTATION
ROAD DESIGN
COLUMBIA, S.C.

PLAN SHEET

SCALE 1"= 50' RTE. US 278 DWG. NO.