



The Table of Contents has been revised to correctly reference the page number of Table 3.64 (refer to TOC-24).



Page 2
Wayne Hall
August 22, 2007

In order to ensure protection and maintenance of water quality standards, including wetlands functions, SCDHEC recommends further efforts be made to minimize impacts to wetlands and open water (stream) areas when planning and constructing all projects. Such efforts could include the use of bridges and adequately sized culverts to maintain hydrologic flows and aquatic life passage, as well as minimizing road width and utilizing 2:1 slopes in sensitive areas. SCDHEC will be able to provide more specific comments regarding this project when wetlands and stream impacts are delineated (quantified) and road designs are completed. The above information will be useful in making a decision regarding 401 Water Quality Certification and a Construction in Navigable Waters Permit (if applicable) administered by this office. If required, the Water Quality Certification may be conditioned to address specific modifications and measures that may be required to further reduce wetland and water quality impacts (e.g., to impaired sites) after a review of detailed project drawings.

A mitigation (compensation) plan addressing unavoidable impacts for this project has yet to be developed. The ACT agreed that the calculation of required credits will be determined using elements of the Corps of Engineers (COE) Standard Operating Procedure (SOP) to quantify stream and wetland mitigation by watershed. The identification of mitigation sites and associated funding will be coordinated through the ACT. A final mitigation plan addressing unavoidable wetland/stream impacts approved by SCDHEC and the COE will be required for 401 Water Quality Certification and prior to the work beginning.

I will be happy to attend any other pre-application meetings to facilitate the permitting process for this project. Please call me at 898-4179 if you have any questions.

Sincerely yours,

Mark Giffin, Project Manager
Water Quality Certification, Standards, Navigable Waters
and Wetlands Programs Section

cc: Gina Kirkland
Region 4 EQC



An expanded discussion of the avoidance and minimization for wetlands and streams has been added to Section 3.12.13 (refer to pages 3-181 to 3-184).

The wetland delineation has been completed for the Preferred Alternative and the impacts quantified using the conceptual design. A detailed road design has not been finalized.



South Carolina Department of Natural Resources



John E. Frampton
Director

September 17, 2007

Mr. Patrick Tyndall
Environmental Program Manager
Federal Highway Administration
1835 Assembly Street, Suite 1270
Columbia, SC 29201

Mr. Mitchell Metts, P.E.
I-73 Project Manager
S.C. Department of Transportation
P.O. Box 191
Columbia, SC 29202

RE: Interstate 73 North Draft Environmental Impact Statement
Dillon and Marlboro Counties, South Carolina

Dear Mr. Tyndall and Mr. Metts:

South Carolina Department of Natural Resources personnel have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Interstate 73 North (I-73) project submitted by the Federal Highway Administration and the S.C. Department of Transportation.

The S.C. Department of Transportation in association with the Federal Highway Administration proposes to construct this new interstate roadway from the North Carolina/South Carolina state line, near Hamlet, NC to the Myrtle Beach area. This DEIS is for the northern phase of the project extending from Interstate 95 (I-95) in Dillon County, through Marlboro County, to connect with future Interstate 74 in North Carolina. The southern phase of the project has been previously addressed through a separate Draft Environmental Impact Statement.

The document states that a typical road section would accommodate a six-lane facility with corridors for future rail lines and allowances for frontage roads where needed. An estimated 400-foot wide right-of-way would be acquired where frontage roads are needed and an estimated 300-foot right-of-way would be acquired elsewhere along the corridor. The three build alternatives evaluated in the DEIS range from 36.8 to 40.6 miles in length. The stated purpose of the project is to provide an interstate link between I-95 and the Myrtle Beach region to serve residents, businesses, and tourists while fulfilling congressional intent in an environmentally responsible and community sensitive manner. The document states that the no-build alternative would not satisfy this purpose. Each of the three build alternatives would satisfy the purpose; however, two of these alternatives were eliminated based upon their potential impacts. Alternative 2 has been selected by the project sponsors as the Preferred Alternative. The stated environmental consequences that would result from the Preferred Alternative include impacts to approximately 114.3 acres of wetlands, approximately 8,100 linear feet of stream impacts in 24 crossings, an estimated 1,505 acres of farmland, the potential relocation of 35 residences and 6 commercial establishments, and potential noise impacts to 3 residences.

We appreciate the efforts of the project sponsors and the preparers of the document in developing a DEIS that is well written, well organized and provides a good chronology of the development of the I-73 project



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including the involvement of the various agencies and the public. We believe that the format used is superior in providing complicated information in a more understandable and user-friendly manner. The document also does a good job of presenting the various benefits and costs associated with the three build alternatives.

We also believe that the use of the Agency Coordination Team (ACT) process and the Corridor Analysis Tool (CAT) have resulted in significant improvements over past transportation planning projects. . Based on our learning experience in the use of the CAT model in the initial southern segment of I-73, we believe that the refinements in the methodology for the CAT tool as applied to the current project have lead to the identification and selection of a route that satisfies the project purpose and need while minimizing natural resource impacts.

We also have previously expressed concerns regarding the potential impacts of this project on wildlife and wildlife habitat including water quality. We cannot overemphasize the direct and indirect impacts a project of this magnitude can have on wildlife resources due to habitat fragmentation. We believe that the DEIS does a relatively good job of outlining and addressing these issues and recommend that the impact minimization measures included in the document be implemented in project plans. Department personnel are available to work with the project sponsors, particularly during the preconstruction phase, to further develop and implement these measures.

The conceptual wetland mitigation plan contained in the DEIS outlines a compensatory mitigation methodology and discusses several different mitigation scenarios including the utilization of landscape scale mitigation and the preservation, restoration and enhancement of wetlands and streams. We are generally in favor of the mitigation concepts presented in the DEIS and encourage the use of landscape scale mitigation planning that enhances existing protection efforts and public benefits. Department personnel will be available to assist the project sponsors in the location and designation of a suitable landscape scale project necessary to mitigate for identified, overall I-73 impacts.

We appreciate the opportunity to work with the Federal Highway Administration, the S.C. Department of Transportation and the members of the Agency Coordination Team in this process of selecting the future alignment of Interstate 73 in South Carolina. We hope that our comments will be helpful guidance in the development of a Final Environmental Impact Statement.

Sincerely,

Greg Nixon for

Robert E. Duncan
Environmental Programs Director

cc: ACT Members



Comment noted.

Comment noted.



Interstate 73 FEIS: I-95 to North Carolina



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 12, 2007

Mr. Patrick Tyndall
Environmental Program Manager
Federal Highway Administration
1835 Assembly Street, Suite 1270
Columbia, SC 29201-2430

Subject: EPA Review Comments on
Draft Environmental Impact Statement (DEIS)
Interstate 73: From I-95 to North Carolina
CEQ No. 20070316

Dear Mr. Tyndall:

The U.S. Environmental Protection Agency (U.S. EPA) Region 4 reviewed the subject Draft Environmental Impact Statement (DEIS) pursuant to Section 309 of the Clean Air Act, and Section 102 (2)(C) of the National Environmental Policy Act (NEPA). EPA appreciates your early coordination with us, and the Agency Coordination Team (ACT) process used to include resource agencies in the scoping and NEPA processes. We appreciate your attention to EPA's comments and concerns regarding the project. The purpose of this letter is to provide you with EPA's comments on the DEIS.

The DEIS assesses the potential environmental impacts of the no-build alternative and build alternatives for I-73. The build alternatives would create an interstate link to facilitate access between I-95 and I-74, terminating at I-74 in Richmond County, North Carolina. The planned southern portion of I-73 (previously evaluated in a separate DEIS) would facilitate travel between I-95 and the Myrtle Beach Region.

The DEIS identifies Alternative 2 as the Preferred Alternative selected by FHWA and SCDOT. Alternative 2 takes into consideration community concerns in addition to environmental parameters. The DEIS also includes information about the Community Impact Assessment for the project.

Although Alternative 2 has the lowest total wetland acreage impacts and wildlife habitat impacts, mitigation will be required for some areas. Specifically, a mitigation plan to compensate for the 114.3 acres of wetlands impacts will be required.

Jurisdictional streams will be identified and mapped during the wetland delineation for the Preferred Alternative. A compensatory mitigation plan is a necessary precursor to the application for a Section 404 permit. EPA looks forward to working with FHWA, SCDOT and the ACT



A detailed mitigation plan will be developed prior to the Section 404 permit application. The ACT has agreed to develop mitigation based upon the USACE SOP, which will provide guidance in determining the appropriate magnitude and type of mitigation to be performed, refer to Section 3.12.4, pages 3-184 to 3-188.



Interstate 73 FEIS: I-95 to North Carolina



team to expedite development of the mitigation plan. The project will also require a Section 402 NPDES Permit.

Based on EPA's review of the DEIS, Alternative 2 received an "EC-1" rating, meaning that some environmental concerns exist that need to be further addressed. Specifically, further information should be included in the FEIS regarding wetlands delineation and mitigation plans, results of the protected species and archaeological surveys, and stream impacts. Impacts to prime farmlands and indirect and cumulative impacts are also concerns. Unavoidable noise impacts should be reasonably mitigated.

Please see our enclosed detailed comments. Thank you for the opportunity to comment on this project, and your continuing coordination with EPA. If we may be of further assistance, please contact me or Ramona McConney of my staff at (404) 562-9615.

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office

Enclosures: Detailed review comments
Summary of Rating Definitions and Follow Up Action

cc: Mitchell Metts, P.E., SCDOT



The results of the wetland delineation and the protected species and archaeological surveys are included in the FEIS. A plan for the mitigation of wetland impacts is being developed in coordination with the ACT.



**Detailed EPA Review Comments on
Draft Environmental Impact Statement (DEIS)
Interstate 73: From I-95 to North Carolina
CEQ No. 20070316**

General Comments

Overall, the DEIS is clear and very well written, with many helpful maps and illustrations. We appreciate the indexing and the reader-friendly style of the document, which facilitated review of the document. We commend FHWA and SCDOT for their excellence in producing this document; this DEIS fully describes NEPA issues, and our reviewers appreciated its quality and thoroughness. We also appreciated your attention to Invasive Species and Migratory Birds in the DEIS.

We appreciate FHWA's and SCDOT's outreach and interaction with agencies and local communities, giving them the opportunity to offer input and comments on the proposed project. The Community Impact Assessment in the DEIS is very descriptive.

The DEIS notes that there is uncertainty regarding whether I-73 will be a toll road. Further NEPA analysis will be needed if the facility is tolled, since tolling would be expected to influence the amount of impacts.

Alternatives

Alternative 2 was selected as the Preferred Alternative by FHWA and SCDOT. This alternative has the lowest amount of wetland impacts (114.3 acres), and the least impacts to total farmland, prime farmland, lowest cost, lesser number of relocations, close proximity to existing infrastructure, and good location to serve the communities of the project study area. Many agencies, local governments and members of the public support this alternative.

Air Quality

The DEIS states that "*Air quality impacts are not anticipated by the proposed project,*" (Section 3.9.3). The project area is currently in attainment of the NAAQS standards. I-73 is included in the South Carolina Transportation Infrastructure Program. Monitoring data for both the ozone and PM2.5 standards should be included in the FEIS.

Cultural Resources/Historic Preservation

According to the DEIS, the Preferred Alternative would not directly affect any known above ground historic resources. A detailed archaeological resources survey will be completed for the Preferred Alternative prior to the FEIS.