



Comment noted and text has been added to Chapter 1 under section 1.1.3 concerning the agreement between South Carolina and North Carolina. The I-74 project in North Carolina has been added to Section 3.17.7 on page 3-225.



NMFS requests additional information be developed to supplement the DEIS to more clearly define the purpose and need of an additional interstate highway and the potential cumulative impacts associated with the proposed construction of these roadways.

Thank you for the opportunity to provide these comments. If further assistance is needed, please contact Prescott Brownell or Kay Davy at 219 Fort Johnson Road, Charleston, South Carolina, 29412, or by telephone at (843) 953-7202.

Sincerely,

/ for

Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc: (via electronic mail)

SCDNR
SCDHEC
FWS, Charleston
COE, Charleston
EPA, Atlanta



Consensus on the Purpose and Need was reached by the ACT on December 9, 2004, and a concurrence letter was received from NOAA on November 2, 2005.

Text has been added throughout Chapter 3 addressing the potential cumulative impacts associated with the proposed project.



South Carolina Department of Natural Resources



July 28, 2006

John E. Frampton
Director

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

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

RE: Interstate 73 South Draft Environmental Impact Statement
Dillon, Horry and Marion 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 South (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 southern phase of the project extending from Interstate 95 (I-95) in Dillon County, through Marion County and terminating at S.C. Route 22 in Horry County. The northern phase of the project will be addressed through a separate 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 eight build alternatives evaluated in the DEIS range in length from 42.6 miles to 48.3 miles. 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 build alternatives would satisfy the purpose; however, seven of these alternatives were eliminated based upon their potential impacts. Alternative 3 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 384 acres of wetlands (including approximately 19,200 linear feet of stream impacts), the relocations of 81 residences and 7 commercial establishments, and potential noise impacts to 37 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 including the involvement of the various agencies and the public. We believe that the format used is superior to previous formats 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 eight build alternatives. However, we have several general concerns, specific issues, and recommendations that are outlined below.





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Development of Alternatives

While we believe that the Corridor Analysis Tool (CAT) and the Agency Coordination Team (ACT) process in general have been significant improvements over past transportation planning projects, we continue to have concerns regarding the use of the CAT. The purpose of the tool is to produce a least impact route between endpoints. While we acknowledge that the tool may have produced a viable least impact route given the assumptions that were used, we also believe that the methods used to develop these assumptions may have eliminated potentially less damaging routes early in the process.

Since the beginning of this process our agency has stated that the crossing of the Little Pee Dee River is our primary concern. We believe that the Preferred Alternative (Alternative 3) crosses the Little Pee Dee at the least disturbed of the existing road corridor crossings (SC 917). This alternative also crosses the Little Pee Dee Heritage Preserve, a Section 4(f) resource; and it crosses Lake Swamp, a major tributary of the Little Pee Dee and one of the most significant tributary wetland systems in the study area. The proposed interstate crossing of the Little Pee Dee together with the existing SC 917 corridor plus the proposed replacement on new alignment of the existing SC 917 bridges could create a disturbed corridor of over 500 feet through this sensitive area. The Preferred Alternative crossing of Lake Swamp would also segment a large area of wetland habitat between Road S-23 (Nichols Highway) and the 300 - 400 foot interstate corridor.

The DEIS correctly states that we included Alternative 3 along with Alternatives 5 and 7 as “potentially preferred” at the April 19, 2006 Act Meeting; however, we must state for the record that Alternative 3 is our least preferred of the these three alternatives for the reasons outlined above. In our January 4, 2005 letter regarding proposed alignments, we recommended that the three existing crossings of the Little Pee Dee/Lumber River system (US 501, SC 917 and SC 9) be studied in more detail to provide a reasonable range of alternatives. We included a SC 917 crossing (Alternative 3) among our “potentially preferred” alternatives to be consistent with this previously stated position regarding having a range of alternative crossings. We recommend that Alternative 5 and Alternative 7 be reconsidered as potential less damaging preferred alternatives.

Indirect Impacts to Wetlands and Streams

The DEIS states that borrow areas will be identified in altered wetlands having lower functions and values if enough upland areas are not available for any given segment of the road. We believe that borrow areas for road construction are directly related to the construction of the road and should be addressed as direct impacts.

Water Quality Impacts

The DEIS states that pollutants washing off bridges would enter into streams untreated if closed drainage systems are not installed. The document then examines the feasibility of using these systems where runoff would be piped from bridges and treated prior to entering adjacent waters and concludes that due to the complex design and costs of maintenance these systems would not be cost effective. We believe that at a minimum there should be no direct discharges into the



As detailed in Chapter 2 and the *Alternative Development Technical Memorandum*, the CAT was utilized to develop the 141 preliminary Build Alternatives. The sensitivity of the CAT program was also tested using a variety of assumptions. It was determined that the CAT was identifying the least impact route based on several parameters. In addition, the CAT was specifically used to generate a multitude of preliminary alternatives that were further modified through engineering and consideration of impacts to the natural and human environment. Once the CAT generated the preliminary Build Alternatives, the program was only used to quantify potential impacts.

Please refer to Appendix E for the Section 4(f) Evaluation that was prepared due to the impact to the Little Pee Dee Heritage Preserve. The proposed crossing of Nichols Highway over Lake Swamp also has been modified to parallel the existing crossing.

As described in Chapter 2, Alternative 5 and Alternative 7 were viable alternatives, but Alternative 3 had less impacts and better features (refer to Section 2.7.5, page 2-70).

Comment noted and text has been added to Chapter 3, Section 3.12.8, page 3-156. The project will follow the established SCDOT policy in regards to borrow pits.



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open waters of the Little Pee Dee River. We also recommend further evaluation of alternative storm water management systems that could reduce pollutant loading into adjacent streams and wetlands.

Wildlife and Wildlife Habitat Impacts

The DEIS recognizes the increased population of black bears inhabiting the study area and states that vehicle/bear collisions may increase as a result of increased traffic on SC 22. The document also states that an increased number of collisions between vehicles and other wildlife species can be expected. We believe that these collisions will increase as traffic increases in other portions of the project area as well and in particular the western portion of Horry County. The document does not address the direct impacts of habitat fragmentation from the new roadway on black bears and other wildlife species nor does it address measures to decrease mortality. We recommend that measures such as appropriate wildlife crossings on the new roadway and SC 22 be addressed in a FEIS.

Conceptual Wetland Mitigation

The conceptual wetland mitigation plan contained in the DEIS discusses several different mitigation scenarios, including the preservation, restoration and enhancement of wetland areas. We are generally in favor of the concepts presented in the plan and encourage the use of landscape scale planning and sites that enhance existing protection efforts.

We appreciate the opportunity to work with the Federal Highways Administration and the S.C. Department of Transportation in this process of choosing 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,

Robert E. Duncan
Environmental Programs Director



Comment noted. The results of the hydrological modeling indicated no significant water quality effect attributable to the roadway runoff, refer to Chapter 3, Section 3.17.6.1, page 3-220.

Text has been added to Chapter 3, Section 3.14.7, pages 3-186 through 3-188, to address potential impacts to black bears due to habitat fragmentation and the potential for collisions due to higher traffic volumes. At the time of the FEIS, no decision had been made concerning the use of wildlife crossings.

The ACT has determined to use USACE SOP, based on watershed units, to develop mitigation credits needed. These are to be used as guidance to develop large scale mitigation site(s).



United States Department of the Interior

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Mr. Mitchell D. Metts, P.E.
I-73 Project Manager
South Carolina Department of Transportation
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Columbia, South Carolina 29202

Dear Mr. Metts:

The Department of the Interior (DOI) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Proposed Construction of Interstate 73 (I-73) South from I-95 to the Myrtle Beach Region, Dillon, Horry, and Marion Counties, South Carolina**. The following comments concern the U.S. Fish and Wildlife Service.

Interstate 73 is a project mandated by the U.S. Congress with passage of the Intermodal Surface Transportation Equity Act of 1991. This initial high priority transportation corridor was proposed to connect Michigan to Charleston, South Carolina. The project was continued with the passage of the Transportation Equity Act in 1998; however, the corridor's southern terminus was relocated to the Myrtle Beach region of South Carolina. The current transportation bill, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users furthers the project by allocating funds in excess of \$40 million dollars toward the completion of I-73 in South Carolina.

The South Carolina Department of Transportation (SCDOT), through the Federal Highway Administration (FHWA), proposes to construct this new interstate roadway from the North Carolina/South Carolina State line, near Hamlet, North Carolina, to the Myrtle Beach area. This DEIS was prepared for the southern phase of the project which will begin at I-95 in Dillon County and proceed southeast to the Myrtle Beach region of Horry County, South Carolina. A northern phase of I-73, from I-95 to the State line, will be addressed in a separate EIS.

Eight alternatives were evaluated in the DEIS, which range from 42 to 48 miles in length and have a variable right-of-way between 300 and 400 feet in width. The stated purpose of I-73 is to provide an interstate link between I-95 and the Myrtle





Beach region, thereby fulfilling a portion of the project's Congressional mandate. Five needs for the I-73 project were identified and further classified into primary and secondary categories. System linkage and economic development of the region are the considered primary needs. Secondary needs were identified as hurricane evacuation, relief of local congestion, and multimodal planning. It is anticipated that a High Speed Rail (HSR) system may be incorporated into the I-73 corridor; however, the planning and construction of the HSR will require a separate analysis under the National Environmental Policy Act (NEPA) and is not a part of this DEIS.

The I-73 proposal is the one of largest single projects the SCDOT has undertaken. Interstate-73 will span four counties and impact many facets within the region. Not only will natural resources be studied, environmental justice issues must be considered as well as cultural communities, historic and archeological sites, socio-economic issues, hazardous materials, political interests, and a variety of others. Therefore, an Agency Coordination Team (ACT) was formed to assimilate these issues in preparation for the DEIS.

General Comments

The DOI finds the DEIS very well written and it provides a good chronology of the history of the I-73 project, agency involvement, the alternative selection process, and impacts associated with each alternative. Numerous information box insets placed throughout the document provide an effective means to define, clarify, and accentuate important elements. It is apparent that all eight of the considered alignments would achieve the goal and purpose established for I-73 as well as satisfy identified primary and secondary needs. Only through comparison of potential impacts did Alternative No.3 ascend to become the preferred alternative by the SCDOT and the FHWA. However, the DOI is concerned over a number of issues presented in the DEIS and offers the following comments for the SCDOT and the FHWA consideration.

Section 3.5 Section 4(f) Resources

Two of the eight alternatives, including the preferred, will directly impact the Vaughn Tract, which is a component of the Little Pee Dee Heritage Trust Preserve. The DEIS provides a draft review of the Section 4(f) Evaluation in Appendix D describing the proposed alternative and its impact upon the Vaughn Tract along SC-917 where approximately 30 acres will be utilized. Mitigation is offered for the affected tract through the purchase of compensatory acreage that presumably would then be included into the Heritage trust program.

However, the DOI does not believe the Section 4(f) evaluation is complete. Although compensation is offered, the evaluation does not demonstrate that there is no prudent and feasible alternative to avoid the tract, nor does it reveal all possible planning measures to minimize harm in accordance with 49 C.F.R. 303. In fact, the draft Section 4(f) evaluation states that the alignment was