

South Carolina

February 4, 2013

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

> In Reply Refer To: HDA-SC

Mr. Randall Williamson, P.E. Environmental Engineer South Carolina Department of Transportation 955 Park Street, P.O. Box 191 Columbia, South Carolina 29202

Dear Mr. Williamson:

We received your letter requesting a Finding of No Significant Impact (FONSI) determination for the proposed I-85/I-385 Interchange Improvement project in Greenville county, South Carolina. Based on the information provided to complete the environmental process we concur that the project will have no significant impacts; therefore a FONSI is justified. Project commitments made during the NEPA process shall be included in the project construction proposal and ultimately carried out.

Please proceed accordingly with the publication of the notice of availability of location and preliminary design approval and availability of the FONSI. The final documentation is to be made available to the public upon request. Also, a notice of the FONSI approval should be sent to the State inter-governmental review contacts established under Executive Order 12372.

By our adoption of the FONSI and completion of the public comment/hearing requirements of 23 U.S.C. 128, the SCDOT is authorized to proceed with further project development. Since this project involves modification of an interchange, this letter also serves as approval of your Interchange Modification Report dated September 5, 2012.

Sincerely, tuck I. Typidall

(for) Robert L. Lee Division Administrator

Enclosure

cc: David Kelly, SCDOT Environmental Coordinator

File 23.03811

FEDERAL HIGHWAY ADMINISTRATION SOUTH CAROLINA DIVISION OFFICE FINDING OF NO SIGNIFICANT IMPACT

for

I-85/I-385 Interchange Improvement Project Greenville County, South Carolina

File No. 23.03811, PIN 38111_RD01

Project Description

The South Carolina Department of Transportation proposes to improve the existing I-85 and I-385 interchange located in Greenville County. (Figure 1).

SCDOT proposes to reconstruct the existing I-85 and I-385 interchange to include new direct connect ramps between I-85 and I-385; new collector-distributor roadways; and improve numerous ramp movements along the interchange. The proposed improvements have been extensively studied, including various traffic and alternatives analyses in the determination of the preferred alternative. The project corridor includes the existing I-85 freeway, I-385 freeway, I-85/I-385 interchange, and adjacent interchanges in each direction along I-85 and I-385 for a total project study area of approximately 1,812 acres.

The proposed reconfiguration of the I-85/I-385 interchange is currently included in the Greenville-Pickens Area Transportation Study (GPATS), Fiscal Year 2012-2017 Transportation Improvement Program (TIP). The proposed project is listed under the Interstate Upgrade Program, with current funding provided through the Interstate Maintenance Program (IM) and the National Highway System (NHS). The GPATS TIP currently documents an estimated funding cost of approximately \$221 Million.¹

The proposed project is also listed in the current South Carolina State Transportation Improvement Program (STIP), which includes information about federally funded projects for the 2010-2015 timeframe. The STIP currently documents an estimated funding cost of approximately \$245 Million.²

The total cost of the preferred alternative is estimated at \$245 Million. Therefore, it has been determined that there is a reasonable availability of funding to construct the proposed project. It is anticipated that the project will be developed and constructed through a "Design-Build" process.

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¹ GPATS Fiscal Year 2012-2017 TIP, Final Report. Prepared by Greenville County Planning Department. 2011

² STIP Fiscal Year 2010-2015 TIP. http://www.scdot.org/inside/stip/shtml. Assessed December 14, 2011.

Figure 1 Insert

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Purpose and Need

The primary purpose of the project is to improve operational efficiency of the existing I-85/I-385 interchange to accommodate existing and projected traffic volumes. The secondary purpose of the project is to improve the safety of the interchange. Expanded discussion regarding the project purpose and need is included in **Section 2.2** of the approved Environmental Assessment.

Project Alternatives

SCDOT has considered various location and design alternatives in the process of developing the currently proposed preferred alternative. The initial studies identified seven potential alternatives (1, 1A, 1B, 2, 2A, 3, and 4) for improving the interchange facility. These alternatives were evaluated and scrutinized during the early phases of project development. Alternative 1 (all variations) and Alternative 3 were eliminated from further analysis, and the SCDOT considered a No-Build Alternative and two build alternatives for the interchange improvement. Each of the alternatives considered included comparison with respect to environmental constraints (i.e. wetlands, relocations, etc.), construction costs and schedule. Detailed information regarding the alternatives analyzed is documented in **Section 3.0** of the approved Environmental Assessment.

No-Build Alternative

The No Build Alternative, which consists of the Department making no improvements to the existing I-85/I-385 interchange, was considered a baseline for comparison. This alternative would not improve the existing operational conditions of the interchange, thus the facility would continue to operate at unacceptable levels of service within the next 20 years. The No Build Alternative would not improve the operational efficiency of the interchange, and therefore would not satisfy the purpose and need for the project and is not considered an acceptable alternative. The No Build Alternative would result in continued operational deficiencies, unacceptable levels of service, traffic congestion, and safety concerns. The No-Build Alternative would also not be consistent with the Long Range Transportation Plan (LRTP) for this portion of Greenville County. Therefore, the No-Build Alternative was eliminated from further consideration, but was retained as a baseline for applicable comparison and evaluation.

Build Alternatives

SCDOT considered two build alternatives for improvement the I-85/1-385 interchange. Each alternative includes: new direct-connect ramp from I-85 southbound to I-385 southbound; a new C-D roadway in both directions along I-385 between Woodruff Road and I-85; and elimination of the access from the I-385 southbound to the I-85/Woodruff Road interchange. Detailed information regarding the build alternatives is documented in **Section 3.3** of the approved Environmental Assessment.

Alternative 2

Alternative 2 was initially developed and evolved through multiple iterations, including 2A, 2B, 2C, and 2D. In summary, Alternative 2D would construct a new direct-connect ramp from I-85 southbound to I-385 southbound; improve the radius on the loop from I-385 northbound to I-85 southbound; construct a new C-D roadway in both directions along I-385 between Woodruff

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Road and I-85; eliminate the I-85 southbound C-D roadway between I-385 and Woodruff Road; and remove access from the I-385 southbound to the I-85/Woodruff Road interchange. In addition, the I-85 ramps would be extended to the Pelham Road interchange to further improve the operation of the interchange. Alternative 2D would improve the existing facility and address six of the seven documented operational deficiencies. The key improvements include the direct-connect ramps from I-85 southbound to I-385 southbound which results in a LOS improvement. However, this alternative requires replacement of the I-385 bridges over I-85, a new bridge structure for I-85 northbound to I-385 northbound, and a new structure from I-85 southbound to the I-85/Woodruff Road interchange.

Alternative 2D would cost approximately \$292 million, require approximately 19 acres of new right-of-way, and would relocate four adjacent commercial businesses. In addition, this alternative is expected to impact up to 2,130 LF of streams and other linear conveyances.

Alternative 4

Alternative 4 was initially developed and evolved into 4A following further analysis. Alternative 4 would provide new direct-connect ramps from I-85 southbound to I-385 southbound and from I-385 northbound to I-85 southbound; a new C-D roadway in both directions along I-385 between Woodruff Road and I-85; improvement of the I-85/Woodruff Road interchange by replacing the bridge and modifying the I-85 northbound exit ramp; elimination of the I-385 northand southbound C-D roadway between I-385 and Woodruff Road; and elimination of the access from I-385 northbound and southbound to I-85/Woodruff Road interchange. In addition, the I-85 ramps would be extended to the Pelham Road interchange to further improve the operation of the interchange. Alternative 4A includes similar features such as the direct-connect ramps; however, differs by modifying the configuration of the northbound I-385 C-D roadway and entrance ramp from the I-385/Woodruff Road interchange; maintaining the existing I-85 northbound C-D roadway; eliminating improvements to the I-85/Woodruff Road interchange (i.e. bridge replacement); and retaining various existing structures as cost saving measures, including the I-385 bridges over I-85 and the I-85 northbound to I-385 northbound ramp bridge. Alternative 4A also addresses six of the seven deficiencies with the key difference from Alternative 2D being the replacement of the I-385 northbound loop off-ramp to I-85 with a directconnect ramp.

Alternative 4A would cost approximately \$245 million, require approximately 20 acres of new right-of-way, and would potentially relocate two adjacent commercial businesses. In addition, this alternative is expected to impact up to 2,370 LF of streams and other linear conveyances.

Preferred Alternative

Alternative 4A was selected as the preferred alternative. Alternative 4A, would provide new direct-connect ramps from I-85 southbound to I-385 southbound and from I-385 northbound to I-85 southbound; a new C-D roadway in both directions along I-385 between Woodruff Road and I-85; improvement of the I-85/Woodruff Road interchange by replacing the bridge and modifying the I-85 northbound exit ramp; elimination of the I-385 north- and southbound C-D roadway between I-385 and Woodruff Road; and elimination of the access from I-385 northbound and southbound to I-85/Woodruff Road interchange. The following are the key components and improvements associated with the preferred alternative:

 The existing loop ramps are replaced with direct-connect ramps eliminating undesirable movements and conflicts.

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- A new C-D roadway is provided along I-385 which removes merge points off of I-385, and provides greater weave distances which improves LOS.
- The I-85 southbound C-D roadway is eliminated which eliminates undesirable weave movements and conflicts.
- Merge points are isolated and strategically located (an example is the I-85 southbound movement to I-385 northbound, which merges to I-385 prior to the merge of I-85 northbound to I-385 northbound traffic).
- Maintains existing structures, including the I-385 bridges over I-85, which offers potential cost saving measures over the other alternatives.
- Extends the interchange ramps along I-85 to the I-85/Pelham Road interchange; this allows more efficient access to/from the interchange, preventing potential backup of traffic along the Interstate through lanes.
- Widen I-385 to six-lanes which would provide continuity with the existing facility.

The preferred alternative was selected over Alternative 2D primarily due to cost. The total estimated cost for the preferred is \$245 million, compared to the estimated \$292 million for Alternative 2D. Therefore, there is not a "reasonable availability of funds" to support the required improvements associated with Alternative 2D. In addition, the preferred alternative includes a direct-connect ramp from I-385 northbound to I-85 southbound as opposed to a loop-ramp proposed for Alternative 2D. The direct-connect ramp is the more desirable movement for traffic operation, and would minimize conflict points and potential safety concerns. Table 1 summarizes the impacts for the Build Alternatives.

Table 1: Impacts by Alternative

	Impacts	
Impact Category	Alternative 2D	Alternative 4A (Preferred)
Residential relocations	0	0
Commercial relocations	4	2
Farmland (acres)	0	0
Floodplains (acres)	2.0	2.1
Wetlands (acres)	<0.10	<0.10
Streams/Linear Conveyances (linear feet)	2,130	2,370
Permits	Individual USACE Permit	Individual USACE Permit
Threatened/Endangered Species	None	None
State listed species	None	None
Cultural Resources		
Architectural	0	0
Archaeological	0	0
Section 4(f) Resource (parks, wildlife refuges, etc.)	0	0
Traffic Noise ¹	85	86
Potential Hazardous Material Sites ²	9	8

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	Impacts by Alternatives	
Impact Category	Alternative 2D	Alternative 4A (Preferred)
Right-of-Way (acres)	19	20
Project Cost	\$292 Million	\$245 Million

¹Number of impacted Dwelling Units; based on Preliminary Noise Analysis

Impacts Summary

This section includes a summary of the potential environmental effects of the project. Expanded discussion regarding the probable impacts on the environment is included in **Section 4.0** of the approved Environmental Assessment.

Threatened and/or Endangered Species

Field studies were conducted for the presence of any threatened or endangered plant and animal species within the project corridor. Results of the field assessment and literature review conclude that the proposed improvements to the I-85/I-385 interchange project would have no effects on the Section 7 listed and BGEPA species for Greenville County, South Carolina.

No Effect:

- Clemmys muhlenbergii (Bog turtle)
- Sagittaria fasciculate (Bunched arrowhead)
- Sarracenia rubra ssp. jonesii (Mountain sweet pitcher-plant)
- Sisyrinchium dichotomum (White irisette)
- Gymnoderma lineare (Rock gnome lichen)
- Helonias bullata (Swamp pink)
- Hexastylis naniflora (Dwarf-flowered heartleaf)
- Isotria medeoloides (Small whorled pogonia)

Wetlands and Streams

While wetlands and streams have been given special consideration during development and evaluation of the project, it is anticipated that impacts to wetlands and streams would occur as a result of the proposed project. Based on preliminary engineering, a total of approximately 0.1 acres of wetlands and 2,370 linear feet of streams are anticipated to be impacted by the project. Detailed discussions and descriptions for the impacted wetland and streams are included in **Section 4.5** of the approved Environmental Assessment.

A Clean Water Act Section 404 permit is required for impacts to jurisdictional waters of the U.S., including wetlands. Section 404 is administered by the USACE, and depending on the type and extent of jurisdictional waters of the U.S., including wetlands, to be impacted, Section 404 permitting requirements can range from activities that are considered exempt or preauthorized, to those requiring pre-construction notification (PCN) for a Nationwide Permit (NWP) or requiring a Section 404 Individual Permit (IP). Based on the projected stream impacts, the Section 404 Individual Permit is anticipated as estimated impacts exceed coverage of the

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² Includes any potential contamination site in which additional ROW may be required

Section 404 General Permit. Specific permitting requirements would be determined once the roadway design is completed and proposed impacts are finalized.

Floodplains

A South Carolina Department of Transportation Location and Hydraulic Design of Encroachments on Floodplains Checklist was completed for the proposed interchange improvements. The survey determined that there are regulated floodplains located within the project area. The project would require the placement of approximately 2.1 acres of fill material along isolated floodplain areas. This fill is associated with the widening of the existing roadway embankment to accommodate the improvements. The impacts from the fill are limited to the outside bank areas of the stream cross section. It is anticipated the fill will have minimal impacts on the water surface elevations along the applicable floodplain. In addition various retaining walls have been incorporated to minimize these impacts.

Hydraulic evaluations will be performed as part of the final design of the project. The design will be completed in accordance with SCDOT and FEMA regulations. If after the completion of the studies it is determined that a conditional letter of map revision (CLOMR) is needed, appropriate coordination with FEMA would take place.

Farmland

A review of the 2010 U.S. Census Bureau map concludes that the project area is within the limits of an "urban area" (i.e. City of Greenville), and therefore includes land that is already in or committed to future development as defined in CFR 658.2(a). As such, the FPPA does not apply to the proposed project.

Relocations/Right of Way Impacts

Based on preliminary design plans for the preferred alternative, the project would require approximately 20 acres of new right-of-way. The majority of this right-of-way would be acquired from existing commercial developments, or areas that are zoned for commercial land uses.

The proposed project would result in the potential relocation/displacement of two commercial businesses. This includes parcel #21 (ID# 547020103002) and #36 (ID# 547020101800). Parcel 21 is located along the northwest quadrant of the interchange, and is expected to be displaced as a result of reconstruction of the interchange, specifically the I-385 southbound ramp to I-85 southbound. This property is currently being utilized for commercial retail. Parcel 36 is located along Roper Mountain Road, just southeast of the bridge over I-85. The parcel is expected to be displaced as a result of replacement and widening of the Roper Mountain Road bridge over I-85 (Figures 25a and 25b), and is currently being utilized for automotive retail services.

The SCDOT would acquire all new right-of-way and process these relocations in compliance with the Uniform Relocation Assistance and Real Property Acquisition policies Act of 1970, as amended (42 U.S. C. 4601 et seq.). The purpose of these regulations is to ensure that owners of real property to be acquired for federal and federally-assisted projects are treated fairly and consistently, to encourage and expedite acquisition by agreements with such owners, to minimize litigation and relieve congestion in the courts, and to promote public confidence in federal and federally-assisted land acquisition programs.

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Hazardous Material Impacts

An Initial Site Assessment (ISA) was conducted to identify possible sites involving the presence and/or past use of underground storage tanks (USTs), above ground storage tanks (ASTs), and/or other hazardous materials within the project study area.

The ISA identified 35 documented contamination sites within the project area, and 59 potential contamination sites within the appropriate research distances. These sites are primarily associated with current and/or former gasoline service stations; auto repair facilities; trucking/transport facilities; industrial facilities; and other retail facilities.

RL Carriers and Piedmont Clarklift have been identified as sites that are considered to represent a moderate to high potential for subsurface contamination. Upon further project development and identification of required right-of-way, it may be warranted to conduct detailed investigations (i.e. Phase II Site Assessment) of the potential contamination sites to further evaluate if the new right-of-way has been adversely impacted. If avoidance of the contamination area is not a viable alternative, tanks and other hazardous materials would be tested and removed and/or treated in accordance with the U.S. Environmental Protection Agency (USEPA) and SCDHEC requirements.

Cultural Resource Impacts

An intensive Phase I cultural resources survey of approximately 1,850 acres associated with the project study area was conducted between September and November 2010. Three new archaeological sites were identified from the survey, with all three sites recommended as "not eligible" for the NRHP. Seven historical architectural sites were identified as a result of the survey, along with one previously identified site (Walker Family Cemetery). These architectural sites are recommended as "not eligible" for the NRHP.

Additional investigations were conducted along the Walker Family Cemetery to identify potential grave locations that may lie outside the formal cemetery boundary, and ensure the proposed project did not impact any potential grave sites. The proposed project is not expected to impact any identified graves or potential graves. However, the Department would ensure that the existing limits of the Walker Cemetery and located grave sites are delineated and identified in the field with construction barrier fence, or other appropriate measure, prior to construction activity along this area. If construction along Roper Mountain Road impedes in the delineated area, the Department would provide an archaeologist on site to monitor all ground disturbing activities.

Section 4(f) Resources

The project would not impact or involve any Section 4(f) resources as defined in CFR 771.135, which includes publicly owned parks, recreational areas, wildlife and waterfowl refuges, and significant historical sites.

Air Quality Impacts

The project was evaluated with regard to the Clean Air Act amendments of 1990. This project would be consistent with the South Carolina State Air Quality Implementation Plan (SIP) regarding the attainment of the NAAQS. Presently, Greenville County meets all air quality

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standards for automobile related pollutants. It has been determined that no air quality issues exist within the project area for any of the build alternatives.

For each alternative in this EA, the amount of MSATs emitted would be proportional to the vehicle miles traveled, or VMT, assuming that other variables such as fleet mix are the same for each alternative. Because the estimated VMT under each of the Alternatives are nearly the same, it is expected there would be no appreciable difference in overall MSAT emissions among the various alternatives. Also, regardless of the alternative chosen, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to reduce MSAT emissions by 57 to 87 percent between 2000 and 2020. However, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be significantly lower than today.

Noise Impacts

A detailed Noise Impact Assessment was prepared in March 2012 to analyze traffic-generated noise which can be expected to occur as a result of the proposed project. This Assessment was conducted in compliance with 23 USC Section 109(h) and (i), the FHWA established guidelines for the assessment of highway traffic-generated noise. In addition, the Noise Impact Assessment was prepared in accordance with 23 CFR Part 772 and the SCDOT Noise Abatement Policy (see Appendix D of the Environmental Assessment).

A total of 490 receivers representing 833 dwelling units were analyzed in the existing and no build condition, and 489 receivers (832 dwelling units) were analyzed in the build condition as a result of a displacement. The existing conditions noise levels range from 52.2-72.7 dBA with 81 receivers (317 dwelling units) impacted. The noise levels calculated for the 2035 No-build conditions range from 52.2-72.7 dBA, with 115 receivers (402 dwelling units) predicted to be impacted. The noise levels calculated for the 2035 Build conditions range from 52.2-72.7 dBA, with 139 receivers (476 dwelling units) predicted to be impacted.

Due to the presence of impacted receivers, noise abatement measures in accordance with 23 CFR 772.13(c) were considered to eliminate or reduce noise impacts associated with the proposed project. The SCDOT Noise Policy documents Three Mandatory Reasonable Factors that must be collectively achieved for noise abatement measures to be considered reasonable. These factors include property owner/resident viewpoints, cost effectiveness, and noise reduction design goal. Six barrier walls were determined to be feasible to construct; however, no barrier locations would achieve the required 8 dBA noise reduction goal of 80% for the benefited receivers. Therefore, it is determined that noise barriers are not feasible or reasonable to construct for noise abatement along the subject project. *Further abatement consideration is not warranted.*

Socio-Economic Impacts

Overall, no significant adverse effect on public facilities, community resources, or services is expected as a result of the proposed project; nor is the proposed project expected to adversely affect the social environment or local economy.

Community Impacts: The proposed project would essentially reconfigure the existing interchange, and would not create an additional barrier to social interaction or isolate any residential community or commercial developments. Access to the I-85/Woodruff Road

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interchange would be limited by the preferred alternative. Specifically, the preferred alternative eliminates access to the I-85/Woodruff Road interchange from the I-385 northbound and southbound to I-85 southbound movements. However, these movements have viable alternate access routes at the I-385/Woodruff Road and I-385/Roper Mountain Road interchanges.

Economic Impacts: The acquisition of right-of-way along the proposed project corridor would initially impact the local economy by reducing the property tax assessments in the area. However, the proposed project is expected to result in economic benefits to Greenville County by improving operations, reducing travel delays, and providing safer conditions.

Environmental Justice: The project is not expected to result in specific benefit, harm, or disproportionately impact any social group, including low-income and minority groups. Therefore, this project is consistent with Executive Order 12898.

Project Coordination

The project has been coordinated with various local, state and federal agencies; local stakeholders; and the general public to identify issues to be considered in the development of the project. A detailed summary of the coordination efforts is included in **Section 4.0** of the approved Environmental Assessment.

Public Involvement

Public Information Meeting: On January 27, 2011 an informal, drop-in format public information meeting was held from 5:00 PM to 7:00 PM at Beck Academy located at 901 Woodruff Road in Greenville, SC. A total of 88 people registered their attendance at the meeting. A total of 41 written comments were received, with 15 comments from individuals who were not signed in as attending the meeting. Of these comments, 10 support Alternative 4; one supports Alternative 2 but not 2C; one supports 2C; one concerned with air pollution; one concerned with noise; with the remaining largely pertaining to various other transportation concerns along the area (traffic signal camera; traffic signal timing; secondary road access). In addition there was a common concern regarding traffic congestion along Woodruff Road and Roper Mountain Road. A detailed summary of the Public Information Meeting is included in **Appendix H** of the approved Environmental Assessment.

Public Hearing: On November 15, 2012 a formal public hearing was held from 5:00 PM to 7:00 PM at Beck Academy located at 901 Woodruff Road in Greenville, SC. A total of 101 people registered their attendance at the Public Hearing, with 22 written comments returned either at the Public Hearing (5), or the 15 days following the Public Hearing (17). One (1) verbal comment was made at the Public Hearing during the formal session. A detailed summary of the Public Hearing is provided in the Public Hearing Certification package included with the FONSI request package.

Revisions Since Approval of the EA

As a result of the public hearing, and stakeholder coordination, the SCDOT has revised the previous design to maintain access along Chrome Drive, minimizing property impacts along this area. Specifically, the new connection of Chrome Drive to Garlington Road would prevent land-locking of two parcels, and maintain existing access. This revision will require an additional 2 acres of new right-of-way, resulting in a project total of approximately 22 acres of new right-of-way. In addition, the revision will impact approximately 0.1 acres of an open water impoundment

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associated with Tributary 3. Figures 25A – 25E from the EA are attached, with the revision to Chrome Drive illustrated in Figure 25B.

The "Hazardous Material/Waste Site Assessment" conducted along the project corridor identified the GE Gas Turbine Plant as a documented site, with ground water contamination. Historically, the groundwater contamination plume approached I-85 and the Woodruff Road area. However, a groundwater pump and treatment system was installed and has since pulled the contamination plume back to the site. The SCDOT was also notified by representatives of the GE Gas Turbine Plant during the public hearing of groundwater monitoring wells located within the project area, mainly along Roper Mountain Road. Further coordination concluded that approximately 9 wells are located within the proposed limits and/or right-of-way as illustrated by the attached figure ("Monitoring Well Locations"). A field meeting with GE and SCDHEC representatives was conducted on January 16, 2013 to evaluate the location of the wells and proposed plans. This issue will continue to be monitored and appropriately coordinated during final design of the project.

Additional coordination was conducted with the U.S. Army Corps of Engineers in October 2012 regarding the jurisdictional waters of the U.S., including wetlands, streams, and open waters. The additional coordination resulted in minor changes to several water features within the project area. Most notable, the previously determined non jurisdictional feature along I-385 southbound, north of I-85, has been revised to a jurisdictional wetland area (i.e. Wetland D) as illustrated in the attached Figure 25B. The area is a linear conveyance that receives stormwater runoff from the roadway and adjacent facilities. Due to these hydrologic inputs, wetland indicators were identified in the field. The proposed project would impact 0.25 acres of this area, resulting in a project total of approximately 0.5 acres of impact to jurisdictional wetlands/open waters. In addition, several open water areas beyond the immediate limits of the proposed improvements have been determined to be jurisdictional open waters. The proposed project is not anticipated to impact any other open water features. These areas are also noted on the attached Figures.

Preferred Alternative Impact Summary

Table 2 summarizes direct human and natural environment impacts.

Table 2. Impact Summary

Impact Category	Preferred Alternative (Alternative 4A)
Residential relocations	0
Commercial relocations	2
Farmland (acres)	0
Floodplains (acres)	2.1
Wetlands (acres)	0.5
Streams/Linear Conveyances (linear feet)	2,370
Permits	Individual USACE Permit
Threatened/Endangered Species	None

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State listed species	None	
Cultural Resources		
Architectural	0	
Archaeological	0	
Section 4(f) Resource (parks, wildlife refuges, etc.)	0	
Traffic Noise ¹	1	
Potential Hazardous Material Sites ²	8	
Right-of-Way (acres)	22	
Project Cost	\$245 Million	

Project Commitments

The following special commitments have been agreed to by the SCDOT:

Table 3. Project Commitments

Commitment	EA Reference Page(s)
Input received during the public hearing process and during the environmental document availability period will be carefully evaluated in the future project development. Modifications will be made where appropriate.	Refer to page 30
The final drainage system will be designed to accommodate the volume of stormwater associated with the preferred alternative. Stormwater control measures, both during construction and post-construction, are required for SCDOT projects constructed in the vicinity of 303(d), total maximum daily load (TMDL), outstanding resource waters (ORW), tidal, and other sensitive waters in accordance with the SCDOT's MS4 Permit (p. 65).	Refer to page 65
To minimize impacts to water quality, the contractor will be required to minimize potential impacts through implementation of construction best management practices, reflecting policies contained in 23 CFR 650 B and SCDOT's Supplemental Specifications on Seeding and Erosion Control Measures (January 12, 2009) (p. 66).	Refer to page 66
The Design-Build Construction Team will be responsible for the acquisition of all required environmental permits. The Department will provide applicable oversight and coordination to ensure compliance. The following are the assumed environmental permits required for the construction of the proposed project: a U.S. Army Corps of Engineers (USACE) permit, under Section 404 of the Clean Water Act; a 401 Water Quality Certification from the South Carolina Department of Health and Environmental Control (SCDHEC); a Land Disturbance permit under the SCDHEC National Pollutant Discharge Elimination System (NPDES)	Refer to page 73

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Commitment	EA Reference Page(s)
Stormwater Program for a construction site exceeding 1.0 acre. These efforts will require evaluation and implementation of various strategies to avoid, minimize, and mitigate the impacts to jurisdictional waters of the U.S. Potential measures would include adjusting fill slopes and implementing erosion control measures, which include seeding of slopes, hay bale emplacement, silt fences, and sediment basins as appropriate, to minimize impact on adjacent wetlands(p. 73).	
At the appropriate stage of project development, a complete hydraulic study performed to SCDOT guidelines for Hydraulic Design Studies would be conducted to more precisely determine the effects of the project on the base floodplains. If after the completion of the studies it is determined that a conditional letter of map revision (CLOMR) is needed, appropriate coordination with the Federal Emergency Management Agency (FEMA) would take place (p. 76).	Refer to page 76
To minimize construction noise, the contractor will be required to comply with the SCDOT 2007 Standard Specifications for Highway Construction, which includes specifications regarding nuisance noise avoidance. Other potential minimization strategies would include workhour limits, equipment muffler requirements, location of haul roads, community rapport, and complaint mechanisms (p. 82).	Refer to page 82
As required by 23 CFR 772.117, the Department will provide the local planning officials with the appropriate noise impact data (i.e. noise contours per page 12 of the Noise Impact Assessment) to aid in the planning and minimization of noise impacts on adjacent projects (p. 88).	Refer to page 88
The determination of areas that warrant Phase II Assessment will be conducted upon final right-of-way acquisitions. Any Phase II Assessment will be site specific, based on hydrogeologic conditions, distance from specific environmental concerns, and other relative factors. If avoidance of the contamination area is not a viable alternative, tanks and other hazardous materials would be tested and removed and/or treated in accordance with the U.S. Environmental Protection Agency (USEPA) and SCDHEC requirements (p. 90).	Refer to page 90
The Department will ensure that the existing limits of the Walker Cemetery and located grave sites are delineated and identified in the field with construction barrier fence, or other appropriate measure, prior to construction activity along this area. If construction along Roper Mountain Road impedes in the delineated area, the Department will provide an archaeologist on site to monitor all ground disturbing activities along this area.	Refer to page 91
The Department, and/or the Design-Build Construction Team will acquire all new right-of-way and process these relocations in compliance with the Uniform Relocation Assistance and Real Property Acquisition policies Act of 1970, as amended (42 U.S. C. 4601 et seq.) (p. 92).	Refer to page 92
Upon approval of the EA, the Department will conduct a Public Hearing to provide an opportunity to review and comment on the project. The	Refer to page 112

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Commitment	EA Reference Page(s)
Public Hearing would be appropriately advertised, along with notification of availability of the approved EA, which will be made available for review prior to the Public Hearing at the appropriate Department's Central and District office (p. 112).	
The Design-Build Construction Team will be responsible for the maintenance of all active monitoring wells along the project corridor. Coordination with the South Carolina Department of Health and Environmental Control (SCHDEC) and the GE Turbine facility will be conducted to ensure compliance with all monitoring plans. This coordination will also determine appropriate action regarding the impacted wells, which may include appropriately abandoning the wells, retro-fitting the wells to meet the new elevations, and/or relocating the wells to the same general areas.	Package

FHWA Decision

The FHWA has determined that this project will have no significant impact on the human environment. This Finding of No Significant Impact is based on the Environmental Assessment and other supporting information, which have been independently evaluated by the FHWA and determined to adequately and accurately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. The Environmental Assessment provided sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. The FHWA takes full responsibility for the accuracy, scope and content of the Environmental Assessment and other environmental documentation for this project.

Patrick J. Typolall

Date: February 4, 2013

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