Project of Division Interest (PoDI)
Stewardship & Oversight Plan

Project Name	Description	County	FMIS #	FHWA Contact
Mark Clark Expressway - I-526 Extension	Mark Clark Expressway - I-526 Extension	Charleston	0036932	Gennie

***Groups of projects may be covered in one plan where each has the same risk areas and response activities. Add additional rows if necessary.**

1. What minimum screening criteria were met (pick all that apply)?
   - ☐ Discretionary Grants and Financing
   - ☒ Major Projects
   - ☐ Public Private Partnerships
   - ☐ Unusual Bridges and Structures
   - ☐ Program Involvement Findings (top risks):
   - ☒ Cost
   - ☒ Significance (Regional/National): Regional Interest
   - ☒ Interest: Environmental
   - ☐ Innovation or Unusual Features:

2. What are the applicable risk areas identified, during the risk-based project assessment, associated with the project selected for risk-based project involvement (select all that are "moderate" and "elevated"):
   - ☐ Project delivery systems
   - ☒ Financial management considerations
   - ☒ Complexity
   - ☒ Environmental considerations
   - ☒ National or regional significance
   - ☐ Other State-specific considerations
   - ☒ Program Involvement Findings & Program Risks

   Please provide a general description and the reason each applicable risk area was selected:

   High level regional interest and public involvement with multiple stake holders.

3. What are the general project elements that will be reviewed (select all that apply):

- ☒ Project Authorization
- ☒ Preliminary Design
- ☒ Final Design
- ☒ Plan, Specification, & Estimate Development
- ☒ Advertising and Award
- ☒ Innovative Contracting/Design Build
- ☒ Contract Administration
- ☒ Construction Inspection & Quality
- ☐ Other – Describe:

Specific description of the elements that will be reviewed and the element's linkage to the risk:

(Please provide a specific description of the elements that will be reviewed and the element's linkage to the risk area identified through the project risk assessment)

4. What are the general S&O activities (include project inspections, compliance reviews, opportunities for innovation, technical assistance and guidance, or post-approval reviews) that the Division will conduct in response to risk (select or add all that apply):

- ☒ Project/Technical Meetings
- ☐ Document/Plan Review
- ☒ Field Review/Inspection & Report
- ☒ Program/Process Reviews & Report
- ☐ CAP Review
- ☐ Special Review
- ☐ Other – Describe:

Please provide a specific description and scope for planned risk response activities; describe the relationship of each planned activity to the risks:

SEE ATTACHMENT A FOR SPECIFIC PROJECT APPROVALS RETAINED BY FHWA*. In addition FHWA Staff will: In addition, FHWA Staff will: (1) Actively participate in development / review / approval of RFQ and RFP contract documents/PS&E ; (2) Participate in Partnering Sessions; (3) Attend Progress Meetings as necessary and to the extent possible; and (4) Conduct construction inspections that will include at a minimum file, structures, pavement, and environmental reviews

***ATTACHMENT A outlines project action responsibilities similar to what is provided in FHWA/SCDOT's joint Stewardship and Oversight Agreement. However, those additional project actions that have been retained by FHWA, as a result of the risks identified for this PoDI, are specified (if any).**

ATTACHMENT A

ATTACHMENT A
Project Action Responsibility Matrix

This matrix identifies the Federal-aid highway program (FAHP) project approvals and related responsibilities. The matrix specifies which actions are assumed by the SCDOT pursuant to this Stewardship and Oversight Agreement ("Agreement") and certain other applicable authorities as specified in the tables in this Attachment A.

The SCDOT is responsible for ensuring all applicable elements of the project are eligible for FAHP funding. Where the SCDOT assumes authority to make a decision, approval, determination or action, the SCDOT decision does not constitute an eligibility, obligation, reimbursement, authorization, or compliance decision by or for the Federal Highway Administration (FHWA). Final decisions on those matters must be made by FHWA.

Table 1: Financial Management

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
1	Review and accept initial financial plan for Federal major projects [23 U.S.C. 106(h)]	FHWA	STATE
2	Review and accept financial plan annual updates for Federal major projects [23 U.S.C. 106(h)]	FHWA	STATE
3	Obligate funds/authorize Federal-aid project agreement (including advance construction authorization and conversion), modifications, and project closures (project authorizations) [23 U.S.C. 106(a)(2); 23 CFR 630.106, 630.703, 630.709]	FHWA	FHWA
4	Authorize to advertise for bids when all preconditions are met [23 CFR 635.112(a), 635.309]	STATE	STATE
5	Approve reimbursements including authorizing current bill (23 U.S.C. 121)	FHWA	FHWA
6	Approval of reimbursement for bond-issue projects [23 U.S.C. 122; 23 CFR part 140, subpart F]	FHWA	FHWA

Table 2: Environment

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
7	EA/FONSI, EIS/ROD, 4(f), 106, 6(f) and other approval actions required by Federal environmental laws and regulations (Note: The FHWA may assign these NEPA actions and other environmental responsibilities to a State DOT as provided by 23 U.S.C. 327)	FHWA	FHWA

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
8	Categorical exclusion approval actions [Note: The FHWA may assign this action and other FHWA environmental responsibilities to a State DOT as provided by 23 U.S.C. 326 and 327. The FHWA also may administratively delegate responsibility for categorical exclusion determinations to a State DOT through a programmatic agreement pursuant to section 1318(d) of MAP-21 and implementing regulations in 23 CFR 771.117(g)]	Administered in accordance with Programmatic Categorical Exclusion Agreement	Administered in accordance with Programmatic Categorical Exclusion Agreement

Table 3: Preliminary Design

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
9	Approval before utilizing a consultant to act in a management support role for the contracting agency [23 CFR 172.7(b)(5)(i)]	Administered in accordance with procedures approved per 23 CFR 172.5(c)	Administered in accordance with procedures approved per 23 CFR 172.5(c)
10	Approval of noncompetitive procurement method for engineering and design-related services [23 CFR 172.7(a)(3)]	~~STATE~~ FHWA	STATE
11	Approve exceptions to design standards [23 CFR 625.3(f)]	~~STATE~~ FHWA	Not subject to 23 CFR 625.3(f)
12	Airport highway clearance coordination and respective public interest finding (if required) [23 CFR 620.104]	STATE	STATE
13	Approve project management plan for Federal major projects [23 U.S.C. 106(h)]	FHWA	STATE
14	Approval of Interstate System access change [23 U.S.C. 111]	FHWA	Not subject to 23 U.S.C. 111
15	Determine the engineering and operational acceptability of points of ingress or egress with the Interstate System (justification reports) for new freeway-freeway interchanges (system), modification of freeway-freeway interchanges, and new partial interchanges or new ramps to/from continuous frontage roads that create a partial interchange [23 U.S.C. 111(e)]	FHWA	Not subject to 23 U.S.C. 111(e)
16	Determine the engineering and operational acceptability of points of ingress or egress with the Interstate System (justification reports) for new and modified freeway-to-crossroad (service) interchanges, and completion of basic movements at existing partial interchanges. [23 U.S.C. 111(e)]	FHWA	Not subject to 23 U.S.C. 111(e)
17	Approve innovative and public-private partnership projects in accordance with TE-045, SEP-14, SEP-15, or SEP-16. [23 U.S.C. 502(b)]	FHWA	FHWA

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
18	Approve any betterment to be incorporated into the project for which emergency relief funding is requested (23 U.S.C. 125; 23 CFR 668.109)	FHWA	FHWA
19	Prior written approval of the Federal awarding agency for the direct charge of up-front acquisition cost of equipment (2 CFR 200.439)	FHWA	FHWA

Table 4: Final Design

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
20	Approve retaining right-of-way encroachments [23 CFR 1.23(b)-(c)]	STATE	STATE
21	Approve use of publicly owned equipment [23 CFR 635.106]	STATE	STATE
22	Concur in use of publicly furnished materials [23 CFR 635.407(a)]	STATE	STATE
23	Approve use of more costly signing, pavement marking, and signal materials (or equipment) is in the public interest [23 CFR 655.606]	STATE	STATE
24	Exception to designation of Interstate project as significant for work zones [23 CFR 630.1010(d)]	STATE	Not subject to 23 CFR 630.1010(d)
25	Determination that a United States Coast Guard Permit is not required for bridge construction [23 U.S.C. 144(c); 23 CFR 650.805, 650.807]	FHWA	FHWA

Table 5: Realty

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
26	Completion of ROW clearance, utility, and railroad work concurrently with construction: Make feasibility/practicability determination for allowing authorization to advertise for bids or to proceed with force account construction prior to completion of ROW clearance, utility and railroad work [23 CFR 635.309(b)]	STATE	STATE
27	Approve non-highway use and occupancy of real property interests [23 CFR 1.23(c), 710.405]	FHWA for Interstate; STATE for Non-Interstate NHS	STATE
28	Approve disposal at fair market value of real property interests acquired with Federal-aid assistance, including disposals of access control [23 CFR 710.403(e), 710.409]	FHWA for Interstate; STATE for Non-Interstate NHS	STATE

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
29	Approve disposal at less than fair market value of real property interests acquired with Federal-aid assistance, including disposals of access control [23 U.S.C. 156; 23 CFR 710.403(e)]	FHWA	FHWA
30	Approve advertisement for bids based on a conditional ROW certification, unless it is not in the public interest to proceed. [23 CFR 635.309(c)(3)(i)]	~~STATE~~ FHWA	STATE
31	Approve physical construction under a contract or through force account work based on a conditional ROW certification, only if there are exceptional circumstances that make it in the public interest to proceed. [23 CFR 635.309(c)(3)(ii)]	FHWA	FHWA
32	Approve hardship and protective buying [23 CFR 710.503]	FHWA	FHWA
33	Requests for credits toward the non-Federal share of construction costs for early acquisitions, donations or other contributions applied to a project [23 U.S.C. 323; 23 CFR 710.507]	FHWA	FHWA
34	Federal land transfers [23 CFR part 710, subpart F]	FHWA	FHWA
35	Functional replacement of property [23 CFR 710.509]]	FHWA	FHWA
36	Waiver of the policy of the availability of comparable replacement dwelling before displacement under specified circumstances [49 CFR 24.204(b)]	FHWA	FHWA

Table 6: PS&E and Advertising

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
37	Approve PS&E [23 CFR 635.309(a)]	~~STATE~~ FHWA	STATE
38	Approve utility or railroad force account work (23 CFR 140.916, 645.113, 646.216)	~~STATE~~ FHWA	STATE
39	Approve utility and railroad agreements (23 CFR 140.916, 645.113, 646.216)	STATE	STATE
40	Approve use of consultants by utility and railroad companies [23 CFR 645.109(b), 646.216(b)]	STATE	STATE
41	Approve exceptions to maximum railroad protective insurance limits (23 CFR 140.916, 646.111)	STATE	STATE
42	Approve use of guaranty and warranty clauses for projects other than design-build projects [23 CFR 635.413(b)]	STATE	STATE
43	Recovery of railroad material - Approval of additional measures for restoration of areas affected by the removal of salvaged material for Railroad work (23 CFR 140.908)	STATE	STATE

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
44	Approve use of lump sum payments to reimburse railroad for work by its forces [23 CFR 646.216(d)(3)]	STATE	STATE
45	Waive Buy America provisions (23 CFR 635.410)	FHWA	FHWA
46	Training special provision - Approval of new project training programs [23 CFR 230.111(d)-(e)]	FHWA	FHWA

Table 7: Contract Advertisement and Award

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
47	Approve cost-effectiveness determinations for construction work performed by contract awarded by other than competitive bidding or by force account (23 CFR 635.104, 635.204)	STATE	STATE
48	Approve emergency determinations for construction work performed by contract awarded by other than competitive bidding or by force account (23 CFR 635.104, 635.204)	STATE	STATE
49	Subrecipient project administration - Approve arrangements for local agency to serve as the supervising agency for the project (23 CFR 635.105)	STATE	STATE
50	Approve advertising period less than 3 weeks [23 CFR 635.112(b)]	~~STATE~~ FHWA	STATE
51	Approve addenda during advertising period [23 CFR 635.112(c)]	~~STATE~~ FHWA	STATE
52	Concur in award of contract or rejection of all bids (23 CFR 635.114)	~~STATE~~ FHWA	STATE
53	Approval of design-build requests-for-proposals (RFP) and addenda for major changes to the RFP during solicitation period [23 CFR 635.112(i)(4)]	~~STATE~~ FHWA	STATE
54	Approve award to the next low bidder [23 CFR 635.114(f)]	~~STATE~~ FHWA	STATE

Table 8: Construction

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
55	Approve contract changes and extra work (23 CFR 635.120) SEE NOTE 1 BELOW	~~STATE~~ FHWA	STATE
56	Approve contract time extensions [23 CFR 635.120, 635.121(b)] SEE NOTE 2 BELOW	~~STATE~~ FHWA	STATE
57	Concur in use of mandatory borrow/disposal sites (23 CFR 635.407)	STATE	STATE

NOTE: FHWA approval is required for change orders meeting either of the following criteria.
1. Change Orders exceeding $250,000.
2. Change Orders for time extensions exceeding 30 days

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
58	Approval of administrative settlements and contract claim awards and settlements (23 CFR 140.505, 635.124)	~~STATE~~ FHWA	STATE
59	Concur in termination of construction contracts [23 CFR 635.125(b)]	~~STATE~~ FHWA	STATE

Table 9: Construction Manager/General Contractor (CM/GC) and Indefinite Delivery/Indefinite Quantity (ID/IQ) Contracting

#	ACTION	AGENCY RESPONSIBLE NHS	AGENCY RESPONSIBLE Non-NHS
60	Approval of advertising for bids or proposals for a CM/GC construction services phase contract [23 CFR 635.504(b)(6)]	FHWA	STATE
61	Determination of indirect cost rate for preconstruction services for a CM/GC project in accordance with [23 CFR 635.504(e)(2)]	FHWA	STATE
62	Approval of preconstruction price and cost/price analysis for preconstruction services for a CM/GC project [23 CFR 635.506(b)(2)]	FHWA	STATE
63	Approval of price estimate for construction costs for the entire project for CM/GC project [23 CFR 635.506(d)(2)]	FHWA	STATE
64	Approval of construction price analysis and agreed price for construction services of a CM/GC project or portion of the project [23 CFR 635.506(d)(4)]	FHWA	STATE
65	Approval of CM/GC project preconstruction services contract award [23 CFR 635.506(e)]	FHWA	STATE
66	Concur in advertising an ID/IQ solicitation prior to completion of NEPA [23 CFR 635.605(a)(2)]	FHWA	STATE
67	Concur in awarding an ID/IQ contract prior to completion of NEPA [23 CFR 635.605(a)(3)]	FHWA	STATE
68	Approve a time extension of an ID/IQ contract [23 CFR 635.604(a)(6)(i)]	FHWA	STATE

Project Name	Description	County	FMIS #	FHWA Contact
Mark Clark Expressway - I-526 Extension	Mark Clark Expressway - I-526 Extension	Charleston	0036932	Gennie

***Groups of projects may be covered in one plan where each has the same risk areas and response activities. Add additional rows if necessary.**

This Stewardship and Oversight Plan is agreed upon by the Federal Highway Administration Federal Aid Division Office and the South Carolina Department of Transportation, and is effective until superseded as of: 03/18/2026

Digitally signed by AARON MICHAEL DAWSON
Date: 2026.03.19 10:16:41 -04'00'

FHWA SC Division

Rob Perry

Digitally signed by Rob Perry
Date: 2026.03.30 15:21:46 -04'00'

SC DOT

State Signature Required?

YES ☒ NO