



DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
69-A Hagood Avenue
CHARLESTON, SOUTH CAROLINA 29403-5107

REPLY TO
ATTENTION OF

Regulatory Division

APR 16 2009

Mr. Robert Lee, Division Administrator
Federal Highway Administration
South Carolina Division Office
1835 Assembly Street, Suite 1270
Columbia, South Carolina 29201

Dear Mr. Lee:

Reference is made to your letter dated March 20, 2009, in which the Federal Highway Administration requested concurrence from the United States Army Corps of Engineers (USACE) in Decision Point Number 1 of the integrated National Environmental Policy Act (NEPA) and Section 404 of the Clean Water Act review process, which is being developed for the proposed extension of Interstate 526 (Mark Clark Expressway) in Charleston County, South Carolina. The proposed activity would entail the construction of approximately 7 miles of new, limited access roadway from the current endpoint at U.S. Highway 17 (Savannah Highway) to the James Island Expressway at Folly Road.

On August 04, 2008, we entered into an agreement with your agency to participate as a Cooperating Agency in the environmental evaluation process for the proposed Mark Clark Expressway. As a Cooperating Agency, USACE will participate in the environmental evaluation process with the Federal Highway Administration (FHWA), who in cooperation with the South Carolina Department of Transportation (SCDOT) and Charleston County, South Carolina is acting as the Lead Agency. We have mutually agreed, along with SCDOT, to use an integrated NEPA and Section 404 of the Clean Water Act review process for the proposed extension of Interstate 526, as a pilot project.

As indicated in your letter of March 20, 2009, FHWA and SCDOT have developed a purposed need statement of the proposed project to be:

- a) Increase the capacity of the regional transportation system,
- b) Improve safety,
- c) Enhance mobility to and from the West Ashley, Johns Island, and James Island areas of Charleston, South Carolina

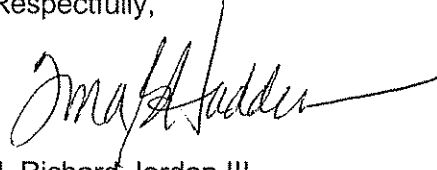
In order to conclude Decision Point Number 1, USACE defines the overall project purpose, which will be incorporated into the Environmental Impact Statement, is to improve the current transportation system to and from the West Ashley, Johns Island and James Island area, thereby completing the State transportation link between the existing terminus of the James Island Connector (SC 30) at Folly Road (SC 171) and the existing terminus of Interstate 526 at US Highway 17, which would provide connectivity within these areas.

We look forward to our continued cooperation in the merger process of NEPA and Section 404 of the Clean Water Act, for effective partnership. Please note that though we

anticipate our mutual participation will help facilitate the permit process, it can not be interpreted as a guarantee of a permit issuance.

If you have any questions concerning this matter, please contact the following member of my staff, Mr. Michael R. Patrick at 843-329-8026 or toll free at 1-866-329-8187.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Richard Jordan III". The signature is written in a cursive style with a long horizontal line extending to the right.

J. Richard Jordan III
Lieutenant Colonel, U.S. Army
District Commander



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
69-A Hagood Avenue
CHARLESTON, SOUTH CAROLINA 29403-5107

July 9, 2009

RECEIVED
Federal Highway Administration

JUL 15 2009

DIVISION OFFICE
COLUMBIA S.C.

Regulatory Division

Mr. Robert Lee, Division Administrator
Federal Highway Administration
South Carolina Division Office
1835 Assembly Street, Suite 1270
Columbia, South Carolina 29201

Dear Mr. Lee:

Reference is made to your letter dated June 10, 2009, in which the Federal Highway Administration requested concurrence from the United States Army Corps of Engineers (USACE) in Decision Point Number 2 of the integrated National Environmental Policy Act (NEPA) and Section 404 of the Clean Water Act (Section 404) review process, which is being developed for the proposed extension of Interstate 526 (Mark Clark Expressway) in Charleston County, South Carolina. The proposed activity would entail the construction of approximately 7 miles of new, limited access roadway from the current endpoint at U.S. Highway 17 (Savannah Highway) to the James Island Expressway at Folly Road.

On August 04, 2008, we entered into an agreement with your agency to participate as a Cooperating Agency in the environmental evaluation process for the proposed Mark Clark Expressway (I-526) project. As a Cooperating Agency, USACE will participate in the environmental evaluation process with the Federal Highway Administration (FHWA), who in cooperation with the South Carolina Department of Transportation (SCDOT) and Charleston County, South Carolina is acting as the Lead Agency. We have mutually agreed, along with SCDOT, to use an integrated NEPA and Section 404 review process for the proposed extension of Interstate 526, as a pilot project.

As indicated in your letter of June 10, 2009, FHWA and SCDOT have developed the Tier I Selection Criteria (Criteria) to identify reasonable alternatives for the proposed Mark Clark Expressway, which are to be evaluated in the Draft Environmental Impact Statement. The Criteria is an evaluation process developed to determine whether the preliminary alternatives would meet the project goals of the proposed project.

The FHWA and SCDOT established units of measure for each criterion and would use two tools to evaluate the alternatives, the Charleston Area Transportation Study Traffic Model and a Geographic Information System. Each alternative would be compared to the no-build alternative to assess how well the alternative performed in each Tier I Criterion:

- a) To assess an alternative's "ability to improve congestion on existing roads," two factors (units of measure) for roads would assess within the study area: the number of hours that travelers spent in their vehicles on a daily basis and delay. Delay is defined as the amount of time travelers spend in congested traffic conditions. For each alternative, the

change/improvement in vehicle hours of travel (VHT) and traffic delays would be compared to the no-build scenario for study area roads. Study area roads include roads in West Ashley, James Island and Johns Island,

- b) To assess an alternative's "ability to improve regional mobility and system linkage" four factors (units of measure) would assess on a regional level: the hours that travelers spent in their vehicles, the number of miles they travel on a daily basis, delays and the average travel times between West Ashley, Johns Island, James Island and other areas of Charleston. For each alternative, these factors would be calculated and compared to the no-build scenario for the regional road network. The regional road network would include all roads in the CHATS traffic model,
- c) To assess an alternative's "ability to increase safety on existing roads," crash and fatality rates (units of measure) would be calculated for road segments in the study area to identify roads that had rates above the statewide averages. Crash rates are calculated based on historical crash data and compared to the vehicle miles of travel on a road. Because future crashes cannot be predicted, a comparison of volume to capacity ratio, a measure of congestion, for these road segments would be used to indicate improvement in traffic conditions and thus, in safety,
- d) Potential relocations (number of residence and business relocations) and wetland impacts (acres) would be quantified in GIS using preliminary right-of-way widths specific to each alternative.

In order to conclude Decision Point Number 2, USACE concurs with the above mentioned methodology and evaluation criteria, which will be used in the reduction of the number of preliminary alternatives in order to determine the reasonable alternatives for the proposed Mark Clark Expressway project.

We look forward to our mutual cooperation in the merger process of NEPA and Section 404 of the Clean Water Act, for effective partnership. Please note that though we anticipate this cooperative participation will help facilitate the permit process, it can not be interpreted as a guarantee of a permit issuance.

If you have any questions concerning this matter, please contact the following member of my staff, Mr. Michael R. Patrick at 843-329-8026 or toll free at 1-866-329-8187.

Respectfully,



J. Richard Jordan III
Lieutenant Colonel, U.S. Army
District Commander

Copy Furnished:

U.S. Army Corps of Engineers
Attn: Steve Brumagin
Columbia Field Office
Strom Thurmond Federal Building
1835 Assembly Street, Room 865 B-1
Columbia, SC 29201