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December 9, 2024

Mr. Brad Clary
Regulatory Division
USACE, Charleston District
69A Hagood Avenue
Charleston, SC 29403-5107

RE: 404(b)(1) Comment Responses for SAC 2018-00205, Individual Permit Application for SC Highway 41 Corridor Improvements, Charleston County, SC

Dear Mr. Clary,

Charleston County is in receipt of your 404(b)(1) letter dated October 29, 2024 requesting additional information to assist with compliance with the Environmental Protection Agency "Guidelines of Specification of Disposal Sites for Dredged or Fill Material" (Guidelines) [40 CFR 230] and in conjunction with Section 404(b) of the Clean Water Act. The following provides a copy of the USACE 404(b)(1) Attachment A comments and Charleston County's response.

a. Bicycles & Pedestrians / Noise

i. Please address whether the widened and/or improved roads will maintain a level of safety for bicycle and pedestrians.

Response: SC 41 within the study area is a two-lane roadway with grassed shoulders and roadside ditches. Bicycle and pedestrian facilities in the project study area currently include 1.3 miles of sidewalks along SC 41 between Virginia Rouse Road and Joe Rouse Road, sidewalks along US 17, a four-foot shoulder on the new Wando River Bridge, and several miles of biking trails in Laurel Hill County Park. Laurel Hill County Park is a 745-acre park owned by Charleston County Parks & Recreation Commission (CCPRC) that abuts SC 41 and the Park West, Ivy Hall, and Carol Oaks subdivisions. This park features several miles of running, walking, or biking trails. In a response to the Letter of Intent (LOI), the CCPRC provided comments supporting bicycle and pedestrian access to Laurel Hill County Park.

The project team has had significant coordination with the Town's Mount Pleasant Way project and is currently including a 10-foot shared use path, SCDOT's minimum recommended shared use path width, along the east side of SC 41, connecting with the recently completed shared-use path on Clements Ferry Road. In addition, a shared use path is being provided along Winnowing Way, Porchers Bluff Road,

Laurel Hill Parkway, and Park West Boulevard. Five-foot wide sidewalks are also proposed along most road segments throughout the project area. Laurel Hill Parkway will end at a new proposed roundabout on Park West Boulevard, which will also include high-visibility (hi-vis) crosswalks and flashing signals. Hi-vis crosswalks and flashing signals will also be used to cross Highway 41 in the Phillips Community and at various intersections throughout the project. These hi-vis crosswalks and flashing signals exceed the minimum SCDOT required standards for pedestrian crossings. All pedestrian and bicycle facilities will meet SCDOT and ADA requirements.

ii. **In the Detailed Noise Report, dated July 7, 2022, it is stated that residences having a noise level reduction of 0.1 dBA as being impacted (R0070), but other residences that have a change of over 11 dBA (R0641) as not impacted. Please address why some are considered impacts and others are not.**

Response: The July 7, 2022 Detailed Noise Report followed SCDOT Traffic Noise Abatement Policy, dated and effective October 10, 2019. Based on that policy, there are two criteria to be considered for a residential receptor (category B) to be impacted: 1) Absolute noise levels >66dBA or 2) substantial noise increase which is defined as an increase in noise levels of 15 dBA or more in the design year above the existing noise level. A receptor is considered impacted if either or both the criteria are met. With that being said, for the following receptors:

- R0070 is impacted because of the build noise levels being over the NAC (Noise Abatement Criteria) of 66 dBA (Category B).
- R0641 is not impacted because it is not over 66dBA or the noise difference between existing and build is not 15dBA or more.

b. **Laurel Hill County Park**

i. **Please detail any studies regarding the effect Laurel Hill Drive will have on the usability of Laurel Hill Park**

Response: The project team met with CCPRC on 12/19/18 and on 9/29/21. During the meeting in 2018, the team presented Alternatives 1, 5A, and 7A, and CCPRC stated that if the road had to impact Laurel Hill Park, they preferred an alternative that would minimize impacts to the park by aligning the road with park boundaries or along existing roadways. This preference aligned with Alternative 7A which has ultimately become the Laurel Hill Parkway alignment. CCPRC said Alternative 5A would prevent CCPRC from using the property for its intended use as a park because it bisected the park. The meeting in 2021 focused on a discussion of future access to their property from either SC 41 or Laurel Parkway, and no concerns were brought up related to the future usability of the park. Copies of CCPRC meeting minutes can be reviewed in the Environmental Report appendices.

ii. **Please address whether Bessemer Road is a possible alternative to avoid or minimize impacts to Laurel Hill County Park.**

Response: Alternative 7 that was presented to the public in 2018 proposed widening of Bessemer Road from 2-lanes to 5-lanes. Following that meeting and significant public comments opposed to widening Bessemer Road, Alternative 7a was developed which moved the 5-lane road to the outer limits of Laurel Hill Park. The Compromise Alternative followed the same general alignment of Alternative 7a, but only includes 2-lanes instead of 5-lanes. After the Compromise Alternative was presented, and the team received feedback from the Park West Community, we did evaluate the potential costs, traffic, right of way, and construction impacts that widening Bessemer Road would have compared to Laurel Hill Parkway. Traffic analysis showed that Bessemer Road would attract nearly 4,500 fewer vehicles per day than Laurel Hill Parkway leading to failure at the SC 41/Dunes West and pushing more traffic through the Phillips Community which would not meet the purpose and need of the project. The main differences are that Laurel Hill Parkway will have no driveways and is a 45 mph speed, while Bessemer has numerous driveways and a 30 mph posted speed, thus reducing the desirability of Bessemer as a route that vehicles would utilize.

iii. **In the Detailed Noise Report, all receptors placed along the Laurel Drive route (M – Q) show background noise only. Models show upwards of 11 dBA increase to this area, list noise abatement measures considered for this corridor to mitigate secondary effects on Laurel Hill County Park.**

Response: The Detail Noise Report followed SCDOT Traffic Noise Abatement Policy, dated and effective October 10, 2019. Based on that policy, substantial increase is defined as an increase in noise levels of 15 dBA or more in the design year above the existing noise level. The maximum noise difference is 14dBA for any of the receptors within the SC 41 corridor. Hence, we do not have any substantial increase impacts along the Laurel Hill Parkway route.

c. **Waters of the United States**

i. **Please address each tidal and non-tidal wetland fill and address the feasibility of using bridges rather than fill/culvert(s). Within the discussion, please specifically address whether the proposed plans can be modified to reduce potential fill impacts to tidal and non-tidal wetlands, including a detailed explanation on the practicability (e.g., costs) of using additional bridge lengths to avoid fill impacts to tidal and non-tidal wetlands in comparison to the current design.**

Response: The roadway design is being evaluated at each wetland location for opportunities to reduce wetland impacts. Feasible options include:

- Eliminating the buffer between the back of curb and 5' sidewalk.
- Moving the 10' shared use path from the east side to the west side of SC 41 between Winnowing Way and Laurel Hill Parkway.

- Using a narrower median in areas without required left turning access to driveways.
- Using boardwalks at critical area wetland crossings instead of a 10' shared use path, thus reducing the required fill width from 17' to 2'.
- Rerouting drainage to combine outfall points and to potentially outfall outside of wetlands.
- Potential utilization of steepened slopes or retaining walls through critical area wetland locations.
- Lowering road profiles in new location roadways when feasible.

Below are descriptions for each freshwater wetland location:

- Wetland 5 – proximity of Winnowing Way to its proposed intersection with SC 41 prevents bridging without significant grade changes to Winnowing Way and SC 41, likely resulting in additional fill impacts to wetlands along SC 41.
- Wetland 5 – proximity of Emma Lane with the intersections of Gregorie Ferry, Colonnade, and SC 41 prevents bridging without significant grade change to the three roads, likely resulting in additional fill impacts to wetlands along SC 41.
- Wetland 56 – the proximity of Laurel Hill Parkway to its proposed intersection with SC 41 prevents bridging without requiring significant grade changes to Laurel Hill Parkway and SC 41, likely resulting in additional fill impacts to wetlands along SC 41.
- Wetland 1 – The connection between Gregorie Ferry Road and Winnowing Way is being removed from the project, which should reduce the overall wetland impacts on the project by around 0.5 acres.
- Wetland 55 – While bridging is feasible, the cost of mitigation of the wetland impacts is much lower than construction of a 200' long bridge. Bridging would cost approximately $1,750,000 more than filling and mitigating.
- Wetland 50 – Depending on the required elevation of Dumont Drive, a bridge may be feasible at this crossing without requiring reconstruction of Bessemer Road near the intersection with Dumont, but it would cost approximately $500,000 more than filling and mitigating.
- Wetland 49 (first impact) - While bridging is feasible, the cost of mitigation of the wetland impacts is much lower than construction of a long bridge. Bridging would cost approximately $3,700,000 more than filling and mitigating.
- Wetland 49 (second impact) - This section of Laurel Hill Parkway is approaching the proposed intersection with Park West Boulevard and would require reconstruction of portions of Park West Boulevard to accommodate a bridge.

Below are descriptions for each critical area wetland location:

- Wetland 11 – a majority of this critical area wetland is being bridged with the exception of the section in front of Tradewind Drive. Bridging in front of Tradewind Drive would have significant access impacts to the residents of that neighborhood.
- Wetland 16 – there is existing road embankment through this section and relatively minor widening (one additional travel lane) through this section. Bridging would require complete removal of the existing road and would likely carry impacts into the Phillips Community. Boardwalk is being considered instead of a shared-use path. Steeper slopes or retaining walls are being considered for the west side embankment.
- Wetland 20 – there is existing road embankment with only one additional lane of traffic being added, so bridging was not considered. Boardwalk is being considered for the shared-use path, and the buffer between the sidewalk and back of curb is being eliminated. Options are being explored to reduce the median width.
- Wetland 28 – the majority of this critical area is being bridged. Bridging any further south would impact access to the Republic Tract. Options are being considered for using steeper fill slopes or retaining walls to minimize the footprint of the fill.
- Wetland 31 – the majority of the widening work is to the east and away from the critical area wetland. The sidewalk is being moved to the back of curb to further reduce the fill in the critical area at each impact to this wetland. Boardwalk is being considered instead of the shared-use path at Station 260+00.

ii. Please provide a detailed explanation regarding the proposed routing of Laurel Hill Road and its proposed impacts to Wetland 16, Wetland 55, and Wetland 56 and specifically address whether routing to the east could minimize or avoid impacts to these wetlands.

Response: Laurel Hill Parkway was routed in a way to minimize impacts to Laurel Hill Park while still maintaining a vegetated buffer between the Parkway and neighborhood backing up to the park. In addition, the intersection of the Parkway was established across from the Cardinal Hill neighborhood as this provides about 1,600 feet of space for vehicles traveling northbound to merge into a single northbound lane through the Phillips Community or turn right onto Joe Rouse Road. Shifting the Parkway further to the east would further impact the Park.

- Wetland 56 – impacts are unavoidable with this alignment, but the Parkway does cross through the narrowest part of the wetland, and 2:1 slopes are being used to minimize the project footprint.
- Wetland 16/55 – the alignment does cross through these two adjoining wetlands but crosses at the narrowest point of the two combined wetlands. Options are being looked at to use a boardwalk instead of the shared use

path and to lower the roadway profile and reduce the fill impacts. 2:1 fill slopes are being used to minimize the project footprint.

2. **Comments received during the project Public Notice.**
    a. **Agency Comments: Please review the following agency letters and respond to comments:**
        i. **<u>NOAA – National Marine Fisheries Service</u>: Letter dated July 10, 2023.**

1. **The County should provide to NMFS the worksheets used for determining the number of credits needed from mitigation banks to offset the impacts to freshwater and tidally influenced areas. After reviewing the worksheets, NMFS may recommend different scoring resulting in different credit needs.**

   Response: Mitigation worksheets used to offset impacts to freshwater and tidally influenced wetlands are attached for review as requested.

2. **The County should pursue compensatory mitigation for tidally influenced freshwater wetlands at a mitigation bank having this habitat. If this is not possible, the number of credits required by the permit should reflect the absence of type-for type replacement.**

   Response: The freshwater wetlands expected to be impacted by the Project are not tidally influenced and are separated from critical areas by uplands. Aside from king tide flooding events, it is not expected that salt-water infiltration occurs frequently enough to characterize the freshwater wetlands as tidal. The freshwater wetlands observed do not have the features generally found where there would be tidal flow, and there is not sufficient upstream freshwater flow at the project location to create this type of system.

3. **The County should demonstrate the proposed culverts will handle all expected/predicted flows, including low-flow conditions, normal flows, high flows, storm flows, and the full range of tidal flows.**

   Response: Detailed hydraulic analyses have been performed to verify that the proposed culverts can handle the design flows for the project. A copy of the Detailed Hydraulic Analysis Reports can be provided upon request.

4. **The County should avoid destruction, removal, or smothering of oyster/shell habitat through fill activity or culvert installation.**

   Response: An environmental commitment will be added to include the avoidance and destruction, removal, or smothering of oyster/shell habitat through fill activity or culvert installation.

5. **The County should reduce shading impacts from the MUP by constructing the walkway using grated decking boards or planks rather than cement, with a minimum spacing of 0.50 inches between deck boards.**

   Response: The County is reviewing options for the use of boardwalks. These recommendations will be taken into consideration.

i. **South Carolina Department of Natural Resources: Letter dated July 14, 2023.**

The SCDNR recommends considerations for the state threated spotted turtle be included for the proposed project. SCDNR recommends the following in the areas associated with the new road through Laurel Hill County Park:

- **Avoid any construction in areas within or adjacent to aquatic resources (wetlands, streams, etc.) from January 15th through May 31st.**
- **Prior to any construction activity, install silt fencing from November 15th through January 15th. Silt fencing should include 45-degree arms to direct spotted turtles to the uplands adjacent to the waterbody and away from the construction site. The 45-degree arms should be placed at a minimum of 100 ft from the waterbody and no more than 300 ft from the waterbody. Additionally, silt fence arms should extend at least 50-ft and extend in each direction so that the ends of each 45-degree angle to the fence meet to form a triangle. Silt fencing should remain in place throughout the duration of the proposed construction activities.**
- **Prior to construction, monitor the silt fencing to ensure it is effectively working properly on a monthly basis. This should effectively exclude the species from the project area prior to construction activities. Once construction activities begin, the silt fence should be monitored weekly for the integrity of the fencing and the presence of spotted turtles or other herpetofauna or small wildlife species. If spotted turtles are encountered, the SCDNR state herpetologist should be notified immediately by calling 843-527-8448.**

Response: These commitments will be included in general notes in the construction plans and in SWPPP documents and the contractor will be required to adhere to these commitments during project construction.

The SCDNR recommends right-of-way through and adjacent to forested and tidal wetlands should be maintained in low growing, native vegetation. Maintenance of right-of-way should be conducted via hand clearing rather than with chemicals to reduce the potential for contamination and negative impacts on aquatic resources. If chemicals are used, a 50-foot buffer on either side of the wetland crossing should be established where no herbicide treatments would be allowed. This will serve to retain the riparian vegetation while reducing the amount of chemical runoff into the aquatic environment.

Response: General notes regarding limiting the use of chemicals will be included in the construction plans and in the SWPPP documents.

b. **<u>Public Officials Comments</u>: Representative Kathy Landing submitted a letter dated July 10, 2023.**

Aggressive "regional traffic model" and local neighborhoods do not use Bessemer Road and would not utilize Laurel Hill Parkway. The 4-3-4 configuration of Hwy 41 without the Laurel Hill Parkway and improved intersections would adequately serve this area through the 2045 design year.

Response: The County submitted two separate response letters to Ms. Landing in May 2023 detailing the reasoning for the Compromise Alternative both from a design and traffic standpoint. These letters are included as attachments to this response. Below are high level details:

The design team has performed extensive traffic analysis on the alternative and the intent of the Laurel Hill Parkway is to provide an efficient, free-flowing limited access roadway for local traffic to access neighborhoods such as Dunes West and Park West, through the design year of 2045.

To determine the traffic impacts on SC 41, the team utilized the CHATS travel demand model and included developments in and around the SC 41 corridor that would impact traffic on the whole project. Traffic isn't routed specifically to Laurel Hill Parkway if it's not a logical route for that traffic to utilize. For example, Carolina Park wouldn't take Park West Boulevard to Laurel Hill to SC 41 to head to North Charleston, just as Ms. Landing details in her letter. The primary re-routing to Laurel Hill Parkway is vehicles from Dunes West that would have taken SC 41, now using the Parkway instead, or vehicles from Park West that would have taken Park West to US 17 SB, now using the Parkway to SC 41 to get to and from US 17 SB instead.

Concerned with the impacts to wetlands and increased flooding due to reduced floodwater storage from destruction of wetlands complex.

Response: The Highway 41 project would be designed to contribute to the least possible flood and water quality impacts in the project area. A permit will not be issued if the project's design does not meet SCDES's flood prevention design standards. No roads or buildings have been identified that will be flooded because of the project.

EO 11988, Floodplain Management, requires that efforts be made by federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification of floodplains. When there is a practicable alternative, federal agencies are required to avoid direct or indirect support of floodplain development. EO 11988 prohibits floodplain encroachments that are uneconomic, hazardous, or would result in incompatible development of the floodplain. It also prohibits any action that would cause a critical interruption of an emergency transportation facility, a substantial flood risk, or an adverse impact on the floodplain's natural resource values.

The Preferred Alternative (PA) would result in approximately 22.7 acres of direct 100-year floodplain impacts through the placement of fill material and construction of the proposed roadway improvements. The project is not expected to be a significant or longitudinal encroachment as defined under 23 CFR 650A. In addition, the project would be developed in accordance with EO 11988 (Floodplain Management and 23 CFR 650 subpart A), and roadway/bridge design would comply with all

appropriate floodplain regulations and guidelines. Final hydraulic evaluations will be completed as part of the final design of the project. The design will be completed in accordance with SCDOT and FEMA regulations.

c. **Public Organizations: Please review the following letters submitted by public organizations and respond to comments:**

   i. **Smart Growth Highway 41: Letter dated July 7, 2023**

Laurel Hill Parkway design would cut through a now-designated flood zone and potential neighborhood flooding concerns.

Response: The design team has reviewed the project site extensively along the Laurel Hill Parkway alignment and has proposed a design that reduces stormwater runoff to properties located along Bessemer Road and provides a stormwater basin at the intersection of Laurel Hill Parkway and Park West Boulevard to mitigate potential increases in stormwater flow for the post-construction conditions. The Laurel Hill Parkway alignment is in an area that previously drained into the adjacent neighborhood drainage systems. The roadway drainage systems will collect the stormwater from the proposed roadway and convey the runoff to natural drainage waterways not located within the adjacent neighborhoods. The project stormwater report will include detailed calculations accounting for the proposed stormwater routing design for the 2-year, 10-year, and 25-year storms.

In addition to the roadway drainage systems along Laurel Hill Parkway, the proposed design includes an improved crossline at the SC 41 / Horlbeck Tributary crossing located downstream of the western portion of Laurel Hill Parkway. The proposed crossline will improve conveyance for the tributary which receives runoff from the neighborhoods adjacent to the proposed Laurel Hill Parkway.

The proposed Laurel Hill Parkway will have no significant impact on drainage conditions in the neighborhood areas in the vicinity of the parkway and will have no influence on how the surrounding neighborhoods respond to flash and non-flash flooding.

Community leadership in the direct project footprint of the project should be included in any National Historic Preservation Act consultations with federal and state preservation officers.

Response: Among the 19 identified archaeological sites in the 2014 Cultural Resources survey at Laurel Hill, only one site may be potentially affected. Further investigation to avoid, minimize and/or mitigate potential impacts will be performed before any construction activities take place. Consultation on these efforts will be undertaken by the County with the USACE and the State Historic Preservation Office.

Potential presence of populations of threatened or endangered species in old-growth pine trees in nearby Francis Marion National Forest, and historically been found near Laurel Hill Park.

Response: The review of the habitat requirements and previous records for the federally listed species for Berkeley and Charleston Counties, along with the field observations and surveys, conclude that there is low potential for the presence of any federally protected species along the project area including Laurel Hill Park. However, based on the scope of the work and limited available habitat, it was determined that the project "may effect, not likely to adversely affect" the following eleven species: West Indian manatee, Northern long-eared bat, frosted flatwoods salamander, Hawksbill sea turtle, Kemp's Ridley sea turtle, Loggerhead sea turtle, Eastern black rail, red-cockaded woodpecker, wood stork, Atlantic sturgeon, and Shortnose sturgeon. In addition, it was determined that the project would have "no effect" on the remaining federally protected species listed for Berkeley and Charleston Counties. Coordination by the County and USACE is on-going with the U.S. Fish and Wildlife Service and U.S. National Marine Fisheries Service as part of the Section 404 Individual Permit review process.

Based on field surveys and coordination with the SCDNR, not all of the species in the USFWS IPaC report are likely to occur within the project footprint. Rafinesque's big-eared bat and northern long-eared bat may have suitable habitat within the mature forested areas, especially where snags and tree cavities occur. The project will likely avoid impacts to these species by adhering to the recommended tree clearing avoidance timeframe between November 15th and March 31st, which applies to both species of bats.

Laurel Hill Parkway design will dramatically increase the number of vehicles driving through this area and greatly increase the potential and probability for accidents involving pedestrians.

Response: The intersection of Laurel Hill Parkway and Park West Boulevard is proposed to be a roundabout with high visibility crosswalks that never cross more than one lane of traffic by providing pedestrian refuge between lanes, will utilize pedestrian actuated rectangular rapid flashing beacons to warn drivers of pedestrians and bicyclists attempting to cross the road, and will provide enhanced lighting at the roundabout. The countermeasures described above are recommended by FHWA in FHWA-SA-21-049 "Crosswalk Visibility Enhancements". Similar warning beacons are already in place at two existing roundabouts on Park West Boulevard. In addition, shared used paths are being proposed along Laurel Hill Parkway and Park West Boulevard with seven feet or more separation from the edge of the travel lanes and the edge of shared-use paths.

Laurel Hill Parkway design would reduce the efficiency of a state highway that is designated as a "hurricane evacuation route" and present a safety hazard making it more difficult for first responders, firefighters and police to respond to communities in the area.

Response: The current evacuation route provides a single lane on SC 41 from US 17 and continues approximately 17 miles north as a single lane to SC 402. The proposed design provides two northbound lanes from US 17 to Joe Rouse Road, a singe northbound lane and a center turn lane between Joe Rouse Road and Dunes

West Boulevard, and from Dunes West Boulevard to the Clements Ferry Road/SC 41 intersection, and then a single northbound lane to SC 402.

During stakeholder meetings, emergency responders expressed concerns about responsiveness to incidents along existing SC 41 because of traffic congestion. Reducing congestion along SC 41 is critical to providing access for hurricane evacuations and emergency responders. The additional capacity provided along the entire corridor and the additional connectivity provided with Laurel Hill Parkway will provide for more routing and less congestion for first responders.

ii. Community Action Group for Encouragement: Letter dated July 9, 2023

Response: Charleston County and the Community Action Group for Encouragement (CAGE) have met at least 12 times between 2018 and 2021. During that time, the County evaluated at least three very different concepts proposed by CAGE but found that none of them would meet the primary purpose of the Project to improve congestion along SC 41. Discussion and analysis of Community concepts continued in 2022 and 2023 during the FHWA Mediation process conducted by the United States Department of Justice (DOJ) but resulted in the same findings. The discussions and evaluations have resulted in at least six significant changes to the project design that eliminated or minimized impacts to the Seven-Mile community while still meeting the purpose and need of the project. A memo dated July 14, 2023 was prepared to provide specific details about the extensive coordination between the County, the Community, and CAGE and is included as an attachment to this response letter.

iii. Charleston Moves: Letter dated July 7, 2023

Concerns for senior citizens in the Phillips Community and in neighborhoods along the corridor crossing the SC 41 roadway safely and the need for safe pedestrian access.

Response: As part of this project, five-foot sidewalks will be provided along the west side of SC 41and a 10-foot multi-use path would be provided on the entire east side of SC 41. The Highway 41 project also includes a multi-use path along Laurel Hill Parkway that will connect to the existing path along Park West Blvd. and to a new path along Highway 41. Laurel Hill Parkway will end at a new proposed roundabout on Park West Boulevard, which will also include high-visibility (hi-vis) crosswalks and flashing signals. Hi-vis crosswalks and flashing signals will also be used to cross Highway 41 in the Phillips Community and at various intersections throughout the project.

The project team has had significant coordination with the Town's Mount Pleasant Way project and is currently including a 10-foot shared use path along the east side of SC 41, connecting with the shared-use path currently under construction on Clements Ferry Road. In addition, a shared-use path is being provided along Winnowing Way, Porchers Bluff Road, Laurel Hill Parkway, and Park West Boulevard. Five-foot wide sidewalks are also proposed along most road segments throughout

the project area. Pedestrian and bicycle accommodations will be provided consistently throughout the project corridor.

Request for enhancing the pedestrian crossing at SC 41 and Joe Rouse Road with two or three additional crossings with high-visibility crosswalks, refuges, signals (such as Rectangular Rapid Flashing Beacons) and signage along SC 41 and within the Phillips Community. Also requested is a mid-block crossing and refuge incorporated at Parkers Island Road/Canyon Lane and another around Penders Boulevard/Bennett Charles Road/Sunchaser Lane and at Bent Oak Road and Oliver Brown Road.

Response: Crosswalk locations are being reviewed throughout the project and these specific locations within the Phillips Community will be added to the plans for approval by the SCDOT.

Concern for speeding along Highway 41 and request to coordinate the reduction of the speed limit to 35 – 40 mph within the Phillips Community with SCDOT as part of permitting process.

Response: The County will coordinate with the SCDOT to determine if the speed limit can be reduced to 35 – 40 mph within the Phillips Community.

Request for a continuous 10-foot multi-use path throughout the corridor to increase pedestrian safety.

Response: A continuous 10-foot multi-use path will be provided on the entire east side of SC 41. The Highway 41 project also includes a multi-use path along Laurel Hill Parkway that will connect to the existing path along Park West Blvd. and to a new path along Highway 41. Laurel Hill Parkway will end at a new proposed roundabout on Park West Boulevard, which will also include high-visibility (hi-vis) crosswalks and flashing signals. Hi-vis accommodations will also be used to cross Highway 41 in the Phillips Community and at various intersections throughout the project.

iv. Park West Master Association: Letter dated July 7, 2023

Protection of Water Quality and wetlands

Response: The project would have the potential to temporarily impact water quality during construction through various land-disturbing activities. These activities would increase the potential for sediment loading in runoff by mechanized land clearing, removal of vegetation, and alteration of land contours. This potential would be minimized through the use of erosion control BMPs which may include the use of silt fence, sediment basins, sediment tubes, or temporary and permanent cover.

The potential impacts (during and after construction) of the proposed project on water quality would also be evaluated through Section 401 and 402 of the CWA,

which is administrated through applicable SCDES regulations. These regulations require prior approval for land disturbing activities (Section 402), and approval/certification for impacts to Waters of the State (Section 401) to ensure compliance with water quality standards and classified uses. The contractor will be required to minimize possible water quality impacts through implementation of BMPs, reflecting policies contained in 23 CFR 650B and the Department's Supplemental Specification on Erosion Control Measures (latest edition) and Supplemental Technical Specifications on Seeding (latest edition). Other measures including seeding, silt fences, sediment basins, etc. as appropriate will be implemented during construction to minimize impacts to water quality.

Charleston County has 9th highest level of PFAS in the US and request to test and evaluate PFAS risk prior to issuance of 401 Water Quality Certification or pause issuance of permits until testing can be conducted.

Response: Roadway construction is not a known contributor to PFAS contamination, so we do not recommend delaying a permit action on this project as it relates to PFAS. Additionally, PFAS is not a consideration for approval of the Section 401 Water Quality Certification.

v. **The Horlbeck Creek Community: Letter/Presentation dated July 7, 2023**

The only permittable design for Hwy 41 must incorporate a buffer between Tradewind Drive and new Hwy 41, and an access/frontage road connecting them. This can be accomplished without encroachment towards the Horlbeck Creek neighborhood.

Response: As the project has progressed since the submittal of the permit in 2023, the design team has re-evaluated the Horlbeck Creek bridge crossing. The new bridge has been shifted to be built on a completely new alignment while leaving the existing SC 41 roadway embankment in place to serve as the location for the shared use path and leaving an approximate 80' buffer between the existing neighborhood entrance and SC 41. Leaving the embankment in place with the creek still crossing at its current location is intended to prevent future channel migration and potential loss of water access for residents of the Horlbeck Creek community.

Include wooded buffer between Tradewind Drive and Hwy 41

Response: See description above – a full wooded buffer will not be in place but there will be approximately 80' buffer between the existing neighborhood entrance and SC 41 with this updated design.

Include access / frontage road between Tradewind Drive and Hwy 41

Response: A frontage road is not being included as part of this design. The neighborhood will have direct access to SC 41 from their entrance.

Is extra lane to Parkway needed for 1/3 traffic? No, use it for buffer, frontage road in front of Tradewind.

Response: The traffic studies that have been performed as part of the project show that the traffic volumes warrant two northbound and two southbound lanes along SC 41 between US 17 and the entrance to the Parkway. Traffic studies show approximately 1/3 of the traffic on SC 41 will enter/exit at the Parkway to and from the south.

d. **Public Comments: Over 2,000 individual comments were submitted during the Public Notice period.**

Public comments received during the USACE Public Notice have been reviewed and consolidated by comment topic. Below are responses provided for each comment topic.

Comment Topic: **Air Quality**

Response: The National Ambient Air Quality Standards (NAAQS) were established by USEPA under the Clean Air Act (CAA), as amended, to protect public health, the environment, and the quality of life from the detrimental effects of air pollution. The NAAQS have been set for the following criteria pollutants: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM), and sulfur dioxide (SO2).

The proposed project is consistent with the South Carolina State Air Quality Implementation Plan (SIP) regarding the attainment of the NAAQS. Presently, Charleston County meets all air quality standards for automobile related pollutants. The Bureau of Air Quality (BAQ) at the South Carolina Department of Health and Environmental Control (SCDHEC) has determined that transportation control measures are not required to maintain the area's air quality. This project has been determined to generate minimal air quality impacts for criteria pollutants and has not been linked with any special Mobile Source Air Toxic (MSAT) concerns.

For additional information, please refer to pages 55-61 in the Environmental Report.

Comment Topic: **Alternatives/Widening of SC 41**

Response: The primary purpose of the proposed SC 41 Corridor Improvements Project is to reduce traffic congestion within the SC 41 corridor to accommodate future traffic projections. The secondary purposes of the proposed SC 41 Corridor Improvements Project are to enhance safety throughout the corridor, improve transportation system and community connections, and provide bicycle and pedestrian accommodations, while minimizing community and environmental impacts.

The project team performed a planning level screening analysis of twelve different improvement alternatives and a No-Build Alternative using the Charleston Area Transportation Study (CHATS) Travel Demand Model. The results of the analysis demonstrated that nine of the alternatives did not relieve congestion issues on SC 41 for design year 2045, and consequently did not meet the purpose and need of the project.

Following the initial planning level screening analysis, the remaining alternatives were refined and a detailed analysis of Alternatives 1, 2, and 7 was performed. Refinements of the remaining

alternatives included an update of growth forecasts in the project area to correspond to changes in development plans for the Cainhoy Plantation from an initially stated build-out of 18,000 homes to an updated build-out of 9,000 homes. This forecast was applied to the remaining alternatives prior to conducting more detailed Level-of-Service (LOS) analyses.

Alternative 1 was found to continue to meet the purpose and need for the project and was advanced to Level 3 screening. Alternative 2 was eliminated from further consideration because the more detailed traffic analysis confirmed a three-lane section through the Phillips Community would have a failing LOS. Therefore, Alternative 2 was eliminated from moving forward because it does not meet the purpose and need of the project. Alternative 2A was developed during Level 2 screening based on public input received during the May 16, 2018 public meeting and outreach with the Phillips Community. Alternative 2A included a three-lane section through the Phillips Community, similar to Alternative 2, but also included a three-lane section through Bessemer Road and Dunes West Boulevard. During traffic analysis, Alternative 2A did not attract enough traffic volume to reduce congestion levels on SC 41 to an acceptable LOS and was eliminated from further consideration.

While Alternative 5 was determined to not meet the project purpose and need for traffic operations in Level 1, as a result of public comment received, the project team re-evaluated Alternative 5 in an effort to look at alternate ways to distribute traffic in the area. Alternative 5 had initially considered two lanes along a transmission line easement, which did not meet the purpose and need of the project to improve traffic operations along SC 41. During the May 16 to June 16, 2018 public comment period, the County received correspondence from stakeholders, including members from the Phillips Community and the South Carolina Coastal Conservation League that stressed the importance of considering alternatives that minimize impacts to environmental and cultural resources, including the Phillips Community. This correspondence asked about the possibility of a five-lane alternative along the transmission line easement. Based on stakeholder input, the project team added Alternative 5A to Level 2 for consideration.

Alternative 5A would create a parallel five-lane roadway primarily along the existing Dominion Energy South Carolina power line easement running from US 17, through Ivy Hall, Laurel Hill County Park, Dunes West, and tying into SC 41 near Harpers Ferry Way. The traffic analysis showed that Alternative 5A meets the project purpose and need of improving traffic operations and congestion on SC 41; therefore, Alternative 5A was advanced to the Level 3 screening.

Alternative 7A was developed during the Level 2 screening in response to public comments in opposition to Alternative 7 and to lessen impacts on residential areas along Bessemer Road. Alternative 7A modified Alternative 7 to reroute SC 41 parallel to Bessemer Road and onto Laurel Hill County Park property, turn along the power line easement, and then back along Dunes West Boulevard. The traffic analysis showed that Alternative 7A meets the project purpose and need of improving traffic operations and congestion on SC 41; therefore, Alternative 7A was advanced to the Level 3 screening. Alternative 7 was subsequently eliminated from further consideration in favor of advancing Alternative 7A.

Alternatives 1, 5A, and 7A were advanced to the Level 3 screening. During Level 3 screening, the project team began to evaluate the alternatives based on public input, environmental factors, cost, and logistics.

During Level 3 screening, Alternative 5A was eliminated from further evaluation because of the significant impacts to utilities and the environment. Alternative 5A would result in the most property impacts, and the most tidal and non-tidal wetland impacts. Alternative 5A also bisects a Charleston County Parks & Recreation Commission (CCPRC) park, Laurel Hill County Park, and would prevent CCPRC from using the property for its intended use as a park as stipulated in its land trust.

Alternatives 1 and 7A were advanced to the Level 4 screening. During Level 4 screening, the project team continued to evaluate the alternatives based on public input, environmental factors, cost, and logistics. A screening matrix was used to compare these criteria (located in Appendix B), and Alternative 1 was selected as the Proposed Alternative as it provided the best option to meet the project purpose and need while minimizing wetland impacts, would result in the fewest acres of right-of-way acquisition, and had the lowest estimated total cost of approximately $125 million.

Upon identification of Alternative 1 as the Proposed Alternative, the project team went back to the neighborhoods, communities, and project stakeholders to gather their input. The feedback provided by the communities identified additional concerns to the Phillips and Seven Mile Communities, The Phillips Community's primary concern with Alternative 1 was the need to acquire right of way throughout the Community and continued encroachment on their residences. Their primary request was for the maximum footprint of the project to be contained within the existing 75-foot-wide right-of-way within their community along SC 41. The Seven Mile Community's primary concern was the continued widening of US 17 within the limits of their community, and they wanted no additional lanes added to US 17 within the Seven Mile Community.

The project team took a second look at Alternative 7A and created a hybrid of Alternative 1 and 7A called the Compromise Alternative. The Compromise Alternative would widen SC 41 to a four-lane curb and gutter section with a planted median between US 17 and Joe Rouse Road, and from Dunes West Boulevard to Clements Ferry Road, with a five-foot sidewalk on the west side and a 10-foot-wide multi-use path on the east side; in the Phillips Community along SC 41 between Joe Rouse Road and Dunes West Boulevard, the proposed typical section would be a three-lane curb and gutter section with one travel lane in each direction, a center two way left turn lane, and five-foot sidewalks on both sides. The proposed project also includes improvements to the intersection of SC 41 and US 17, a new tie-in road between SC 41 and Winnowing Way, and a 1.3-mile new location roadway, Laurel Hill Parkway, between SC 41 and Park West Boulevard. The proposed typical section along Laurel Hill Parkway consists of two-lanes with curb and gutter and a 10-foot multi-use path on the east side. This alternative avoids the need for proposed right-of-way from within the Seven Mile Community and minimizes impacts to the Phillips Community.

The **Compromise Alternative** was selected as the **Recommended Preferred Alternative (RPA)** as it minimizes impacts to the Phillips Community, eliminates property impacts to the Seven Mile Community at the SC 41/US 17 intersection, provides a two-lane parkway around Park West and along the edge of the Laurel Hill County Park, provides a multi-use path connecting US 17 to the new path built by Berkeley County's Clements Ferry project, and meets the purpose and need of the project for the next 20+ years. It also provides intersection improvements that reduce accident frequencies by allowing turning vehicles to move out of the through lane. It creates a center raised island or two-way left-turn lane to provide a separation between opposing lanes and allows left turning vehicles to move out of the through lanes. The Compromise Alternative would be constructed using standard construction methods. The Compromise Alternative would result in the

fewest amount of required right-of-way parcels, floodplain impacts, and least amount of noise impacts.

For additional information, please refer to pages 17-27 in the Environmental Report

Comment Topic: **Bike/Ped**

Response: Laurel Hill County Park features several miles of running, walking, or biking trails. In a response to the Letter of Intent (LOI), the Charleston County Parks & Recreation Commission (CCPRC) provided comments supporting bicycle and pedestrian access to Laurel Hill County Park. Laurel Hill County Park is a 745-acre park that abuts SC 41 and the Park West, Ivy Hall, and Carol Oaks subdivisions. As part of this project, five-foot sidewalks will be provided along the west side of SC 41 and a 10-foot multi-use path would be provided on the entire east side of SC 41. A 10-foot multi-use path would be constructed on the southeast side of Laurel Hill Parkway. Nearly nine (9) miles of new multi-use path and nearly five (5) miles of new or replaced sidewalk are being proposed as part of the project.

The project team has had significant coordination with the Town's Mount Pleasant Way project and is currently including a 10-foot shared use path along the east side of SC 41, connecting with the shared-use path currently under construction on Clements Ferry Road. In addition, a shared use path is being provided along Winnowing Way, Porchers Bluff Road, Laurel Hill Parkway, and Park West Boulevard. Five-foot wide sidewalks are also proposed along most road segments throughout the project area.

For additional information, please refer to pages 14-15 in the Environmental Report

Comment Topic: **Businesses**

Response: The Recommended Preferred Alternative (RPA) is located primarily along SC 41 and US 17; however, the project will require approximately 44.1 acres of new ROW. This ROW would be acquired from various land-uses (commercial and residential) immediately adjacent to the existing ROW. Since this is a proposed widening project, the improvements would not provide new access, and it is not anticipated to cause a direct change in adjacent land use. The social impacts identified are largely associated with impacts to the residences and existing commercial establishments, mainly regarding changes in access to and from these homes and businesses during construction and once the project is complete. The increased traffic volume along US 17 is expected to increase commercial opportunities for sweetgrass basket stand owners and other business owners in the community, which could result in minor beneficial impacts. Information on construction activities will be updated regularly in order to avoid and minimize the impacts on residents and local businesses during construction. The following strategies have been used on other projects, and would be utilized as necessary:

- Maintaining access to businesses during construction for customers and deliveries
- Maintaining parking lot access.

An attempt would be made to maintain access to all properties along the corridor. In the event that access could not be maintained, the County would negotiate these impacts during the ROW acquisition process.

For additional information, please refer to pages 74-75 in the Environmental Report

Comment Topic: **Churches/Schools/Parks**

Response: The project team has met with the Greater Goodwill AME Church multiple times, including one-on-one meetings, throughout the life of the project. A Community Meeting with the Palmetto Presbyterian Church was held in 2019. Flyers were also distributed at multiple church locations advertising public meetings and community meetings.

The project team has proposed a parkway along the outer limits of Laurel Hill County Park. This decision was made to minimize impacts to the Phillips Community and to offset the reduced roadway capacity (one lane in each direction instead of two) within that segment. The project team met with CCPRC on 12/19/18 and on 9/29/21. During the meeting in 2018, the team presented Alternatives 1, 5A, and 7A, and CCPRC stated that if the road had to impact Laurel Hill Park, they preferred an alternative that would minimize impacts to the park by aligning the road with park boundaries or along existing roadways. This preference aligned with Alternative 7A which has ultimately become the Laurel Hill Parkway alignment. CCPRC said Alternative 5A would prevent CCPRC from using the property for its intended use as a park because it bisected the park. The meeting in 2021 focused on a discussion of future access to their property from either SC 41 or Laurel Parkway, and no concerns were brought up related to the future usability of the park.

Wetland delineations/assessments were performed by environmental scientists in 2017 and 2019. Potential impacts to Laurel Hill County Park would include:

- 10 out of 750 acres of the site would be cleared for construction.
- Less than 2 out of 12 acres of wetlands identified in the Laurel Hill corridor would be impacted.

Impacts to schools are not anticipated.

Comment Topic: **Cost**

Response: The County originally budgeted $130 million to the project in 2016. The 2023 cost estimate puts the current budget at $213 million, which includes significant construction and right-of-way cost inflation, and items that were unaccounted for in the original budget like two bridges on SC 41 (in lieu of widening causeways) and Laurel Hill Parkway. The Parkway cost is $2 million more than the SC 41 to Bessemer Road connector and widening alternative that would introduce impacts to Bessemer Road. The State Infrastructure Bank has committed $62 million that will help offset additional costs of the project.

Comment Topic: **Design**

Response: The County has attempted to consider the concerns of all communities in the design of the project by minimizing impacts to the communities themselves. The County has hosted numerous public input meetings and held meetings with individual communities to listen to their concerns. They have used this information to direct and refine the design of the project. This includes shifting the widening of SC 41 away from certain neighborhoods, using a three-lane section of roadway through the Phillips Community, providing a new location roadway (Laurel Hill Parkway) to significantly reduce traffic that would utilize Bessemer Road, and avoiding the need for a grade separated interchange at the SC 41 and US 17 intersection. These design modifications attempt to provide a solution to the congestion issues that exist today and into the future, while still minimizing the impacts to communities.

Comment Topic: **Environmental Justice**

Response: The USEPA defines environmental justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires federal agencies to identify community issues of concern during the environmental planning process, particularly those issues relating to decisions that may have a disproportionate impact to low-income or minority populations.

In evaluating demographic trends of the six census tracts (CTs) (46.09, 46.15, 46.16, 46.18, 204.04, 204.05) in the study area, patterns became apparent in the study area. Charleston County CT 46.15 had the lowest percentage of non-whites in the study area (at 12.0 percent), while Berkeley County CT 204.05 had the highest percentage of non-whites (at 57.9 percent). Portions of the Cainhoy community in Berkeley County CT 204.05 were founded by freed African Americans after the Civil War, so the high percentage of non-whites in this area may be at least partly attributable to that historic development. All four Charleston County CTs had a lower percentage of non-whites when compared to Charleston County. Perhaps diluted in the Charleston County CT data is the presence of the Phillips Community (in CT 46.15 and 46.16) and the Seven Mile community (in CT 46.09 and 46.18), both of which were founded by freed African Americans after the Civil War, and both of which retain a high percentage of African Americans in their populations.

In the environmental justice-qualifying Phillips Community, the Preferred Alternative (PA) would result in minor to moderate impacts to residential aspects of the community due to the effects to several individual residential parcels spread across the community. In environmental justice-qualifying Seven Mile, changes associated with the PA would result in minor to moderate impacts to social, cultural, and psychological aspects of the community. The impact severity ratings in Phillips would depend on whether an affected parcel contains a residence within close proximity to the proposed roadway and is legally considered heirs' property. These differences in the Phillips Community and the potential for cultural impacts in Seven Mile are due to their traditional cultural heritage as Gullah African American people.

The PA would impact five individual residential parcels of the Phillips Community, four of which have existing residences. As these effects are more severe than in non-environmental justice communities in the study area, the Preferred Alternative would result in disproportionately high and

adverse effects to the environmental justice-qualifying Phillips Community. The changes associated with the PA in Seven Mile are estimated to be minor to moderate and would affect approximately 12 residential parcels and 14 sweetgrass basket stands spread throughout the community.

The PA may have an adverse effect on the Sweetgrass Basket Corridor TCP. Sweetgrass basket stands that cannot be avoided would be relocated outside the proposed new ROW. Mitigation measures will be addressed in the community mitigation plan. Developing strategies for community mitigation will initially involve working with the project engineers to alter the design to avoid or minimize impacts and/or to identify enhancement opportunities to make the project fit better with existing communities. Once the design is finalized and the most affected communities are identified, the project community analysts will meet with representatives of the affected communities to identify avoidance and minimization options and to develop effective mitigation strategies to address adverse impacts.

For additional information, please refer to pages 75-80 in the Environmental Report

Comment Topic: **Floodplains/Flooding**

Response: The Highway 41 project would be designed to contribute to the least possible flood and water quality impacts in the project area. A permit will not be issued if the project's design does not meet SCDHEC's flood prevention design standards. No roads or buildings have been identified that will be flooded because of the project.

EO 11988, Floodplain Management, requires that efforts be made by federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification of floodplains. When there is a practicable alternative, federal agencies are required to avoid direct or indirect support of floodplain development. EO 11988 prohibits floodplain encroachments that are uneconomic, hazardous, or would result in incompatible development of the floodplain. It also prohibits any action that would cause a critical interruption of an emergency transportation facility, a substantial flood risk, or an adverse impact on the floodplain's natural resource values.

The Preferred Alternative (PA) would result in approximately 22.7 acres of direct 100-year floodplain impacts through the placement of fill material and construction of the proposed roadway improvements. The project is not expected to be a significant or longitudinal encroachment as defined under 23 CFR 650A. In addition, the project would be developed in accordance with EO 11988 (Floodplain Management and 23 CFR 650 subpart A), and roadway/bridge design would comply with all appropriate floodplain regulations and guidelines. Final hydraulic evaluations will be completed as part of the final design of the project. The design will be completed in accordance with SCDOT and FEMA regulations.

For additional information, please refer to pages 41-44 in the Environmental Report

Comment Topic: **Historic and Cultural Resources**

Response: The cultural resources survey of the SC 41 improvements project included background research, archaeological and architectural surveys, laboratory analyses, and National Register of Historic Places (NRHP) assessment. These investigations were conducted to identify any historic properties that may be affected by the proposed project.

Previous investigations identified five archaeological sites (38BK171, 38BK1621, 38BK1810, 38CH648, and 38CH649) in the archaeological survey universe. Sites 38BK1621 and 38BK1810 overlap and should be considered one archaeological site, 38BK1621/38BK1810. The current investigation identified 11 new archaeological sites (38CH2534– 38CH2542,38CH2571, and 38CH2674) and four isolated artifact finds (Isolates 1–4).

The architectural survey universe extends through one Historic District (the Phillips community), one Traditional Cultural Property ([TCP] the Sweetgrass Basket Corridor), and includes 100 individual, aboveground resources.

The Phillips community is an NRHP-eligible district located in the central portion of the study area. A previous study resulted in the identification of 28 individual, aboveground resources in the Phillips Community Landscape and Historic District (CL/HD). These individual resources are considered contributing elements of the Phillips CL/HD. Twenty of these 28 resources are in the architectural survey universe. The architectural historian recorded five sweetgrass basket/fruit stands and 24 cultural landscape features in the architectural survey universe that may contribute to the Phillips CL/HD. Additionally, two historic cemeteries (Site 38CH1752/SHPO Site No. 7923 and Site 38CH2675/SHPO Site No. 0563) are in the architectural survey universe and may also be contributing elements of the Phillips CL/HD. Furthermore, cemeteries are protected from desecration by South Carolina state law.

The Seven Mile community is in close proximity to the Phillips community and the two share many historical and cultural characteristics between them. Seven Mile is located at the southern-most portion of the study area, including the intersection of US 17 and SC 41. While Seven Mile has not been specifically recognized by SC SHPO as historically eligible, several resources within the community have been recognized as historic. The project includes a portion of the Sweetgrass Basket Corridor TCP and 33 associated sweetgrass basket stands near the intersection of SC 41 and US 17. Of the 22 previously recorded sweetgrass basket stands located in the current study's architectural survey universe, six are no longer extant. The current investigation recorded 17 newly identified sweetgrass basket stands. These 33 stands are contributing elements to the Sweetgrass Basket Corridor TCP.

Among the 19 identified archaeological sites in the 2014 cultural resources survey at Laurel Hill, only one site may be potentially affected. Further investigation to avoid, minimize and/or mitigate potential impacts will be performed before any construction activities take place.

The Preferred Alternative may have an adverse effect on the Phillips CL/HD, the Sweetgrass Basket Corridor TCP, Site 38CH1752/SHPO Site No. 7923, Site 38CH2674, and Site 38CH2675/SHPO Site No. 0563. If these cultural resources cannot be avoided, proposed improvements should be designed in such a way to minimize or mitigate these adverse effects, in consultation with the South Carolina SHPO.

For additional information, please refer to pages 66-68 in the Environmental Report

Comment Topic: **Historic Communities**

Response: The Highway 41 project will cross through some areas of surrounding historic communities. The proposed alternative minimizes impacts to the historic Phillips Community and eliminates any property impacts to the historic Seven Mile Community. The Preferred Alternative may have an adverse effect on the Phillips CL/HD and the Sweetgrass Basket Corridor. If these historic communities cannot be avoided, proposed improvements should be designed in such a way as to minimize or mitigate these adverse effects, in consultation with the South Carolina SHPO.

For additional information, please refer to pages 66-68 in the Environmental Report

Comment Topic: **Hurricane Evacuation**

Response: The project team has coordinated with SCDOT and the local County emergency management office on hurricane evacuation route requirements to ensure there were no concerns about evacuations. Highway 41 is an evacuation route but currently only one northbound lane is utilized for evacuations, so the project design will not reduce the evacuation route capacity that currently exists.

Comment Topic: **Impacts to Laurel Hill Park**

Response: The project team has proposed a parkway along the outer limits of Laurel Hill County Park. This decision was made to minimize impacts to the Phillips Community and to offset the reduced roadway capacity (one lane in each direction instead of two) within that segment. The project team met with CCPRC on 12/19/18 and on 9/29/21. During the meeting in 2018, the team presented Alternatives 1, 5A, and 7A, and CCPRC stated that if the road had to impact Laurel Hill Park, they preferred an alternative that would minimize impacts to the park by aligning the road with park boundaries or along existing roadways. This preference aligned with Alternative 7A which has ultimately become the Laurel Hill Parkway alignment. CCPRC said Alternative 5A would prevent CCPRC from using the property for its intended use as a park because it bisected the park. The meeting in 2021 focused on a discussion of future access to their property from either SC 41 or Laurel Parkway, and no concerns were brought up related to the future usability of the park.

Wetland delineations/assessments were performed by environmental scientists in 2017 and 2019. Potential impacts to Laurel Hill County Park would include:

- 10 out of 750 acres of the site would be cleared for construction.
- Less than 2 out of 12 acres of wetlands identified in the Laurel Hill corridor would be impacted.

- Impacts to these wetlands have been minimized by shifting the alignment to cross at the narrowest point, using 2:1 fill slopes, reducing the profile to minimize the height over the wetlands.

Comment Topic: **New or Planned Developments**

Response: The consideration of new and/or planned developments included changes to the development plans of Cainhoy Plantation from the initial build out of approximately 18,000 homes to an updated build out of approximately 9,000 homes. The project team also reviewed existing and future land use and zoning plans of Charleston and Berkeley Counties to ensure new and planned developments were considered in the traffic analysis of the project.

Comment Topic: **Noise**

Response: A noise analysis report was prepared to assess noise impacts from the Recommended Preferred Alternative (RPA). The project team used SCDOT policies and FHWA regulations to prepare the noise study. The South Carolina Department of Transportation (SCDOT) Traffic Noise Abatement Policy constitutes the official SCDOT noise policy and procedures for the purpose of meeting the requirements of Title 23 of the CFR Part 772 and applicable state laws. This analysis conforms to FHWA Regulation 23 CFR 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise," and all applicable state laws (23 CFR Part 772 2010).

The FHWA Traffic Noise Model (TNM 2.5) was used to calculate existing noise levels and predict future design year noise levels for three distinct scenarios consisting of the current year (2022) Existing Alternative, design year (2045) No-Build Alternative, and RPA. Inputs to this model include noise sensitive receiver locations and existing and future roadway alignments. In addition, traffic volumes including vehicle mix and posted speeds were used.

Based on the preliminary noise analysis for the 2022 "Existing" Alternative, noise levels would approach or exceed the FHWA Noise Abatement Criteria (NAC) established in the *SCDOT Traffic Noise Abatement Policy* 37 out of 1,366 noise sensitive receivers. Noise levels for the existing condition ranged from 44.6 to 73.3 dBA.

Based on the detailed noise analysis for the 2045 "No-Build" Alternative, noise levels would approach or exceed the NAC established in the *SCDOT Traffic Noise Abatement Policy* for 37 out of 1,366 noise sensitive receivers. Noise levels for the no-build condition ranged from 44.6 to 73.3 dBA, with an average increase of 0.3 dBA over the existing condition. Traffic noise levels resulting from the design year (2045) No-Build Alternative are expected to change between -2.0 to 4.7 dBA compared to the (2022) Existing Alternative.

Based on the detailed noise analysis for the 2045 Build Alternative, noise levels would approach or exceed the NAC established in the *SCDOT Traffic Noise Abatement Policy* for 41 out of 1,366 noise sensitive receivers, including 36 Category B receivers, one Category C receiver, and four Category E receivers. There are no impacts predicted due to a substantial increase in noise levels of at least 15 dB. Noise levels for the build condition ranged from 44.6 to 73.1 dBA. Traffic noise levels resulting from (2045) Build Alternative are expected to vary between -2.7 to 14.0 dBA compared to existing levels. The majority of the impacts would be to NAC Category B (residences).

Since there are receivers that would be impacted by noise from the 2045 Design Year Build Alternative, abatement measures were considered for the proposed project. Based on the detailed noise analysis of 7 potential barriers to shield impacts in the Build Alternative, all of the barriers were found to be not feasible due to access and safety issues. Therefore, there are no noise barriers proposed to be carried forward to the construction phase.

For additional information, please refer to pages 61-64 in the Environmental Report

Comment Topic: **Other**

Several comments received included topics such as:

- Traffic back up on Park West Boulevard from traffic on Laurel Hill Parkway turning back onto SC 41.

Response:

Based on traffic studies, the proposed Laurel Hill Parkway will function at an acceptable level of service (LOS) at its intersections with SC 41 and the Park West Blvd. roundabout. The acceptable LOS indicates that traffic will not back up on Park West Blvd. from the Parkway.

- Impacts to neighborhood entrances, including loss of green space and removal of entrance signs and monuments.

Response:

Through right-of-way negotiations, the County will be required to fairly compensate the owner of neighborhood properties that are losing green space, signage, and monuments due to any direct impacts from the project. The relocation or replacement of signs and monuments required during project construction will be at the County's expense, and the purchase of right-of-way would adhere to the Uniform Relocation Act.

- Request for more project information

Response:

Project information can be found on the project website www.hwy41sc.com under the "Resources & FAQs" tab.

- Loss of monuments in front of Dunes West at Dunes West Blvd and SC 41 and Harpers Ferry and SC 41.

Response:

Through right-of-way negotiations, the County will be required to fairly compensate the owner of neighborhood properties that are losing green space, signage, and monuments due to any direct impacts from the project.

For additional project information, please refer to the Environmental Report and information provided on the SC 41 website.

Comment Topic: **Property Value**

Response: The Highway 41 project will have impacts to properties throughout the project corridor due to roadway widening, new road construction, and drainage improvements. Any properties with direct impacts due to the proposed improvements will require Charleston County to acquire right-of-way for the construction on the property. The right-of-way negotiation process includes an appraisal of the property, and an offer will be made by the County to the property owner based on the fair market value of the property.

Comment Topic: **Residential Areas**

Response: While the Highway 41 project will intersect some areas of surrounding communities, impacts will be limited to homeowner's association properties that front Highway 41 and at intersections along Highway 41. The project minimizes impacts to the Historic Phillips Community and eliminates any property impacts to the Seven Mile Community at the Highway 41/US 17 connections. Based on a detailed noise analysis, noise walls were determined to not be reasonable or feasible due to access and safety issues. However, to minimize construction noise, the construction contractor will be required to comply with the SCDOT's 2007 Standard Specifications for Highway Construction, which includes specifications regarding nuisance noise avoidance.

Comment Topic: **Right-of-Way**

Response: The Highway 41 project will include construction along approximately nine miles of roads. The preliminary project design includes approximately 50 required acres of new right-of-way. Approximately 30 of these acres are commercial and homeowners' association (HOA) properties. Approximately 20 acres are within Laurel Hill Park. There are no individual/residential relocations associated with the project design.

Comment Topic: **T&E Species/Wildlife**

Response: Potential harm to wildlife would be minimized through the design, location, and construction techniques utilized for the project. The proposed design would avoid impacts to two tidal creeks by completely bridging these features. Potential loss of wildlife habitat would be primarily along the edge of existing roadways and/or on the backside of neighborhoods, helping to further minimize impacts to undeveloped land.

The Endangered Species Act (ESA) of 1973 was passed to conserve the ecosystems upon which endangered and threatened species depend and to conserve and recover those species. An endangered species is defined by the ESA as any species in danger of extinction throughout all or a significant portion of its range. A threatened species is likely to become endangered within the foreseeable future throughout all or a significant part of its range. Areas known as critical habitats, essential to the conservation of listed species, also can be designated under the ESA.

The review of the habitat requirements and previous records for the federally listed species for Berkeley and Charleston Counties, along with the field observations, conclude that there is low potential for the presence of any federally protected species along the project area. However, based on the scope of the work and limited available habitat, it was determined that the project

"may effect, not likely to adversely affect" the following eleven species: West Indian manatee, Northern long-eared bat, frosted flatwoods salamander, Hawksbill sea turtle, Kemp's Ridley sea turtle, Loggerhead sea turtle, Eastern black rail, red-cockaded woodpecker, wood stork, Atlantic sturgeon, and Shortnose sturgeon. In addition, it was determined that the project would have "no effect" on the remaining federally protected species listed for Berkeley and Charleston Counties.

Due to the linear nature of the project, the need to widen SC 41, and the presence of wetlands on both sides of the roadway, total avoidance of estuarine resources was not feasible. Conservation measures to minimize the potential effects on species include the following: bridge construction access would occur from upland areas to the extent practicable, standard sediment and erosion control practices would be applied, equipment and materials used during the construction of bridges would not obstruct or impede passage through more than 50 percent of the channel, raw or live concrete would not come into contact with wetlands or open water until cured, only clean rip rap would be used if necessary, pollutants would be prevented from entering waterway or wetlands, no mechanized equipment would operate in wetlands or Waters of the United States (WOUS) unless clearly identified and authorized in the approved plans, use of "slow starts" while pile driving would minimize disturbances, and siltation barriers would be made of materials in which a sea turtle cannot become entangled.

The following commitments will also be included in the Laurel Hill Parkway area for the protection of the state threatened Spotted turtle in the general notes of the construction plans and in SWPPP documents. The contractor will be required to adhere to these commitments during project construction.

- Avoid any construction in areas within or adjacent to aquatic resources (wetlands, streams, etc.) from January 15th through May 31st.
- Prior to any construction activity, install silt fencing from November 15th through January 15th. Silt fencing should include 45-degree arms to direct spotted turtles to the uplands adjacent to the waterbody and away from the construction site. The 45-degree arms should be placed at a minimum of 100 ft from the waterbody and no more than 300 ft from the waterbody. Additionally, silt fence arms should extend at least 50-ft and extend in each direction so that the ends of each 45-degree angle to the fence meet to form a triangle. Silt fencing should remain in place throughout the duration of the proposed construction activities.
- Prior to construction, monitor the silt fencing to ensure it is effectively working properly on a monthly basis. This should effectively exclude the species from the project area prior to construction activities. Once construction activities begin, the silt fence should be monitored weekly for the integrity of the fencing and the presence of spotted turtles or other herpetofauna or small wildlife species. If spotted turtles are encountered, the SCDNR state herpetologist should be notified immediately by calling 843-527-8448.

For additional information, please refer to pages 46-52 in the Environmental Report

Comment Topic: **Traffic and Safety**

Response: The future traffic projections for the project are based on projected growth data gathered by the Berkeley-Charleston-Dorchester Council of Governments (BCDCOG), the area's municipal

planning organization. The proposed project design addresses this growth by ensuring that the key intersections along the corridor will avoid gridlock in the project design year of 2045.

The project will likely include corridor wide lighting for enhances visibility of drivers and pedestrians, additional traffic signals at key intersections, sidewalks and shared-use paths with appropriate buffers from the travel lanes.

The Highway 41 Corridor Improvements project design includes safety features and bicycle and pedestrian accommodations throughout the corridor. The speed limit of Dunes and Park West Blvd. will remain 35 miles per hour. Laurel Hill Parkway will operate at 45 miles per hour, dropping to 15 miles per hour at the new proposed roundabout on Park West Blvd. The new roundabout will include enhanced pedestrian accommodations, including high visibility crosswalks and flashing beacons at each crosswalk. Laurel Hill Parkway also includes pedestrian amenities including a shared use path and will divert more traffic from congested areas. The Parkway would remove nearly 90% of the traffic from Bessemer Rd. likely making Bessmer Rd. a more desirable option for bicycle and pedestrian use.

All safety enhancements will be designed to meet AASHTO, FHWA, and SCDOT requirements.

Comment Topic: **Utilities**

Response: The project will have unavoidable impacts to utilities, including electric, gas, water, sewer and telecommunications providers. All utility owners are aware of the project and any required relocations of their utilities are being coordinated as the project progresses. Disruption to utility services would be kept to a minimum during relocations.

Comment Topic: **Wetlands**

Response: Waters of the U.S. (WOUS), as it applies to the jurisdictional limits of the authority of the U.S. Army Corps of Engineers (USACE), is defined in 33 CFR Part 328, and includes:

- All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- All interstate waters including interstate wetlands;
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds;
- All impoundments, tributaries, and adjacent wetlands to the waters defined above; and
- The territorial seas.

Between October 3 and October 16, 2017, March 8 – 12, 2019, and December 27, 2021, environmental scientists reviewed the project study area for WOUS under Section 404 of the Clean Water Act (CWA). The on-site review revealed nine tidal wetlands (42.6 acres), 55 non-tidal

wetlands (61.8 acres), 26 open water features (4.9 acres), and four freshwater streams (2,016 linear feet [LF]) within the detailed project study area.

The Recommended Preferred Alternative (RPA) would result in various unavoidable impacts to tidal and freshwater wetlands. Approximately 4.6 acres of tidal/critical area wetlands and 6.3 acres of freshwater wetlands would be impacted through the addition of permanent fill material to accommodate the proposed widening. These impacts would be adjacent to the existing roadway and are necessary to accommodate the roadway widening. These impacts would include fill impact for construction of the proposed roadway, along with clearing impacts to install and maintain erosion control measures during construction.

The proposed project would avoid impacts to all five linear drainage features. However, the project would result in a total of approximately 0.1 acre of impact to two open water features (Open Water 1 and 2) through the addition of permanent fill material to accommodate the proposed widening.

Executive Order (EO) 11990 - Protection of Wetlands was issued, in furtherance of the National Environmental Policy Act (NEPA), in order to avoid impacts to wetlands wherever there is a feasible alternative. EO 11990 requires new construction in wetlands to be avoided unless there are no practicable alternatives to the impacts, and the project incorporates all practicable measures to minimize impacts. The assessment of the applicability of alternatives to wetland impacts and the incorporation of avoidance measures considers economic, environmental, and other pertinent factors. Therefore, wetlands and WOUS were given special consideration during development and evaluation of this project. The RPA would permanently impact approximately 11 acres of wetlands. This includes less than 2 out of 12 acres of wetlands identified in the Laurel Hill corridor would be impacted.

For additional information, please refer to pages 33-39 in the Environmental Report

Letter Campaign Topics

Comment Topic: **Increased Traffic/Longer Drive Times**

Response: Traffic modeling shows that the proposed Laurel Hill Parkway will divert local traffic traveling to and from Dunes West and Park West, allowing Highway 41 between Dunes West Blvd. and Joe Rouse Rd./Bessemer Rd. to function adequately now and into the design year of 2045. The proposed Laurel Hill Parkway will help reduce traffic on Bessemer Road by nearly 90%.

Comment Topic: **General Environmental Impact**

Response: The Charleston County project team has diligently followed an extensive environmental review process since project kickoff in 2017. The environmental review examines several factors within the study area, including water quality, costs, endangered species, floodplains, farmlands, historic and cultural resources, wetlands, residential areas, and more. The interdisciplinary project team has coordinated throughout design to avoid or minimize impacts to both communities and the natural environment to the extent possible. Mitigation measures (or environmental commitments) for unavoidable impacts have been included in the project planning.

Comment Topic: **Impact to Wetlands**

Response: Waters of the U.S. (WOUS), as it applies to the jurisdictional limits of the authority of the U.S. Army Corps of Engineers (USACE), is defined in 33 CFR Part 328, and includes:

- All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- All interstate waters including interstate wetlands;
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds;
- All impoundments, tributaries, and adjacent wetlands to the waters defined above; and
- The territorial seas.

Between October 3 and October 16, 2017, March 8 – 12, 2019, and December 27, 2021, environmental scientists reviewed the project study area for WOUS under Section 404 of the Clean Water Act (CWA). The on-site review revealed nine tidal wetlands (42.6 acres), 55 non-tidal wetlands (61.8 acres), 26 open water features (4.9 acres), and four freshwater streams (2,016 linear feet [LF]) within the detailed project study area.

The Recommended Preferred Alternative (RPA) would result in various unavoidable impacts to tidal and freshwater wetlands. Approximately 4.6 acres of tidal/critical area wetlands and 6.3 acres of freshwater wetlands would be impacted through the addition of permanent fill material to accommodate the proposed widening (Figure 4-3, Figure 4-4, and Figure 4-5). These impacts would be adjacent to the existing roadway and are necessary to accommodate the roadway widening. These impacts would include fill impact for construction of the proposed roadway, along with clearing impacts to install and maintain erosional control measures during construction.

The proposed project would avoid impacts to all five linear drainage features. However, the project would result in a total of approximately 0.1 acre of impact to two open water features (Open Water 1 and 2) through the addition of permanent fill material to accommodate the proposed widening.

Executive Order (EO) 11990 - Protection of Wetlands was issued, in furtherance of the National Environmental Policy Act (NEPA), in order to avoid impacts to wetlands wherever there is a feasible alternative. EO 11990 requires new construction in wetlands to be avoided unless there are no practicable alternatives to the impacts, and the project incorporates all practicable measures to minimize impacts. The assessment of the applicability of alternatives to wetland impacts and the incorporation of avoidance measures considers economic, environmental, and other pertinent factors. Therefore, wetlands and WOUS were given special consideration during development and evaluation of this project. The RPA would permanently impact approximately 11 acres of wetlands. This includes less than 2 out of 12 acres of wetlands identified in the Laurel Hill corridor would be impacted.

For additional information, please refer to pages 33-39 in the Environmental Report

Comment Topic: **Impact to Endangered Species Living in Laurel Hill Park**

Response: Potential harm to wildlife would be minimized through the design, location, and construction techniques utilized for the project. The proposed design would avoid impacts to one tidal creek located near Laurel Hill Park by completely bridging this feature. Potential loss of wildlife habitat would occur primarily along the edge of existing roadways and/or on the backside of neighborhoods, helping to further minimize impacts to undeveloped land and endangered species.

Comment Topic: **Water Safety and Quality Concerns**

Response: Water quality refers to the chemical, physical, biological, and radiological characteristics of water. It is a measure of the condition of water relative to the requirements of one or more biotic species and or to any human need or purpose. It is most frequently used by reference to a set of standards against which compliance can be assessed. The most common standards used to assess water quality relate to health of ecosystems, safety of human contact, and drinking water.

The RPA does have the potential to impact water quality through both the quantity and quality of stormwater runoff. The proposed project would result in an estimated 27.6 acres of new impervious (paved) surface area with the SC 41 improvements. This would increase the amount of runoff due to the increase in impervious material, which would be captured and conveyed within the existing stormwater systems. The existing drainage systems include various open and closed (i.e., piped) drainage features that effectively convey stormwater offsite. This drainage system would be improved and designed to accommodate the volume of stormwater associated with the RPA.

Potential impacts to stormwater quality resulting from vehicular traffic were considered. Water quality pollutants commonly associated with vehicular traffic include suspended solids, heavy metals, nutrients, and oil-and-grease. The proposed project is not expected to affect the existing traffic volumes or vehicle mix, and therefore would result in similar pollutant-loading as the existing condition.

The project would have the potential to temporarily impact water quality during construction through various land-disturbing activities. These activities would increase the potential for sediment loading in runoff by mechanized land clearing, removal of vegetation, and alteration of land contours. This potential shall be minimized through the use of erosion control BMPs which may include the use of silt fence, sediment basins, sediment tubes, or temporary and permanent cover.

For additional information, please refer to pages 39-41 in the Environmental Report

Comment Topic: **Historic Preservation Concerns**

Response: The National Historic Preservation Act of 1966 requires federal agencies to review the effects of any proposed projects on historic properties. Historic resources include districts, buildings, sites, structures, or objects that are significant in American history, architecture, archaeology, engineering, and/or culture. Prior to undertaking a project, a federal agency must determine if any resources exist in the study area through detailed literature searches and field

surveys. If resources exist, then the federal agency will consult with the State Historic Preservation Office (SHPO) to determine whether the resource is eligible for listing on the National Register of Historic Places (NRHP) and how the proposed project would impact the resource.

The cultural resources survey of the SC 41 improvements project included background research, archaeological and architectural survey, laboratory analyses, and NRHP assessment. These investigations were conducted to identify any historic properties that may be affected by the proposed project.

Previous investigations identified five archaeological sites (38BK171, 38BK1621, 38BK1810, 38CH648, and 38CH649) in the archaeological survey universe. Sites 38BK1621 and 38BK1810 overlap and should be considered one archaeological site, 38BK1621/38BK1810. The current investigation identified 11 new archaeological sites (38CH2534– 38CH2542,38CH2571, and 38CH2674) and four isolated artifact finds (Isolates 1–4).

The architectural survey universe extends through one Historic District (the Phillips community), one Traditional Cultural Property ([TCP] the Sweetgrass Basket Corridor), and includes 100 individual, aboveground resources.

The Phillips community is an NRHP-eligible district located in the central portion of the study area. A previous study resulted in the identification of 28 individual, aboveground resources in the Phillips Community Landscape and Historic District (CL/HD). These individual resources are considered contributing elements of the Phillips CL/HD. Twenty of these 28 resources are in the architectural survey universe. The architectural historian recorded five sweetgrass basket/fruit stands and 24 cultural landscape features in the architectural survey universe that may contribute to the Phillips CL/HD. Additionally, two historic cemeteries (Site 38CH1752/SHPO Site No. 7923 and Site 38CH2675/SHPO Site No. 0563) are in the architectural survey universe and may also be contributing elements of the Phillips CL/HD. Furthermore, cemeteries are protected from desecration by South Carolina state law.

The Seven Mile community is in close proximity to the Phillips community and the two share many historical and cultural characteristics between them. Seven Mile is located at the southern-most portion of the study area, including the intersection of US 17 and SC 41. While Seven Mile has not been specifically recognized by SC SHPO as historically eligible, several resources within the community have been recognized as historic. The project includes a portion of the Sweetgrass Basket Corridor TCP and 33 associated sweetgrass basket stands near the intersection of SC 41 and US 17. Of the 22 previously recorded sweetgrass basket stands located in the current study's architectural survey universe, six are no longer extant. The current investigation recorded 17 newly identified sweetgrass basket stands. These 33 stands are contributing elements to the Sweetgrass Basket Corridor TCP.

Among the 19 identified archaeological sites in the 2014 cultural resources survey at Laurel Hill, only one site may be potentially affected. Further investigation to avoid, minimize and/or mitigate potential impacts will be performed before any construction activities take place.

The RPA may have an adverse effect on the Phillips CL/HD, the Sweetgrass Basket Corridor TCP, Site 38CH1752/SHPO Site No. 7923, Site 38CH2674, and Site 38CH2675/SHPO Site No. 0563. If these cultural resources cannot be avoided, proposed improvements should be designed in such a way to minimize or mitigate these adverse effects, in consultation with the South Carolina SHPO.

For additional information, please refer to pages 66-68 in the Environmental Report

Comment Topic: **Safety**

Response: The Highway 41 project includes a multi-use path along Laurel Hill Parkway that will connect to the existing path along Park West Blvd. and to a new path along Highway 41 providing safe pedestrian and bicycle use throughout the corridor. Laurel Hill Parkway will end at a new proposed roundabout on Park West Boulevard, which will also include high-visibility (hi-vis) crosswalks and flashing signals. Hi-vis crosswalks and flashing signals will also be used to cross Highway 41 in the Phillips Community and at various intersections throughout the project.

The overall project will benefit first responders by adding highway capacity along Highway 41 and incorporating Laurel Hill Parkway. The project team has coordinated with SCDOT and the local County emergency management office on hurricane evacuation route requirements to ensure there were no concerns about evacuations.

Comment Topic: **General Needs and Welfare of My Local Community**

Response: Charleston County is entrusted with providing for the general needs and welfare of the community. There has been extensive public involvement and opportunities for the community to provide valuable input on this project over many years. The County has listened, thoroughly evaluated, and updated the design to reflect the input provided by project stakeholders. The County has done its best to balance the environmental, social and property impacts associated with the SC 41 corridor improvements to provide an equitable and fair solution. The project has multiple benefits to the community including additional travel lanes to ease congestion on SC 41, additional road connections to provide regional connectivity, and sidewalks and shared-use paths for use by pedestrians and bicyclists throughout the corridor.

Please let us know if you have any questions or require additional information.

Sincerely,

Cal Oyer, PE
Charleston County Public Works
Construction Project Manager