



December 12, 2005

Coastal Conservation League Response to Charleston County's Application to SC Transportation Infrastructure Bank

APPLICATION, P. 5

While the *total population for the region increased around 8%* from 1990 to 2000, *the VMT during the same time period increased 27%*. In each of the three counties, the VMT growth rate was at least double that of the population growth rate. ...As illustrated in **Table 2**, three-quarters of all VMT were on interstates, freeway, and arterials, which are the region's major highways. ...Major roads bear a disproportionate amount of the region's traffic. *Although interstates/freeways account for only 4% of total lane miles, they carry about 30% of total VMT.*

RESPONSE

Building the Mark Clark extension will result in almost 12 miles of major highways dropping at least one level of service (LOS). Slightly more than three miles of major highway will be improved. The Mark Clark will negatively impact some of the Charleston region's most heavily traveled roads, including I-26 and the Mark Clark Expressway.

APPLICATION, P. 6

Table 3 shows average travel time to work for these areas, as well as several other MSA's. Travel time in Charleston-North Charleston, on average, is higher than that of Columbia, Greenville, and the State of South Carolina in general. This is not surprising, since this region is not only one of the state's largest metropolitan areas...

RESPONSE

It is not possible to determine whether commute times will decrease or increase in general if the Mark Clark extension is constructed. However, key routes will experience more congestion and therefore longer delays. The Berkeley Charleston Dorchester Council of Government's (COG) traffic model illustrates that almost 44 miles of road in the Charleston region will drop at least one level of service while 21 miles improve. As the Mark Clark extension makes more miles of road worse, some commuters will experience longer traffic delays.

APPLICATION. P. 6

INCREASE IN QUALITY OF LIFE AND GENERAL WELFARE OF PUBLIC

1. Reduction in Pollution

Cars and trucks emit pollutants while idling in congested areas. Reducing congestion, and thus the time that people spend while their automobiles engines are idling as a result of accidents and other traffic problems, can achieve significant environmental benefits. By reducing these occurrences through increased capacity and increased functionality, pollution is reduced to levels less than would otherwise exist given the growing traffic volumes.

RESPONSE

There is no analysis available to assess the total impact of congestion or pollution changes as a result of the Mark Clark extension. Therefore the applicant's statement is undefended in the application. In a number of places, congestion and pollution will increase. There are many ways extension of the Mark Clark will increase pollution in air and waterways around the Charleston metropolitan region.

1. **Wetland fill** – According to the 1995 Draft Environmental Impact Statement (EIS) for the extension of the Mark Clark, the DOT evaluated four alternative routes for the extension. Of these four, the alternative with the least amount of wetland impact would require 91.6 acres to be filled. The alternative with the most wetland impact would require 108.9 acres of wetlands to be filled. These are both OCRM and USACOE jurisdiction wetlands.
2. **Runoff** – More than seven miles of four-lane freeway is the equivalent of approximately **86 acres** of new impervious surface (assuming an average of 100 feet of paved right-of-way) over the Stono River and its associated creeks and marshes. During construction, debris, equipment, and other runoff will impact wetlands and wildlife species
3. **Air pollution** –There is no documentation of the assertion that the Mark Clark extension will lead to lower levels of air pollution. Further analysis would be necessary to justify the assertion that if the Mark Clark extension is built pollution will be reduced to levels less than would otherwise exist.
4. **Relocation and devaluation of land** –The 1995 EIS estimates that at the time, somewhere between 9 and 12 residences and 5 businesses would be required to relocate. That number is probably higher due to development over the past 10 years. Further, the proximity of the road to residences and businesses will affect their property values.
5. **Land conversion on Johns Island** – Reduced commute times will stimulate more development on Johns Island. Johns Island residents have resisted development because of their desire to live in a rural area. Many residents actively farm land and maintain livestock. Others simply want to avoid large scale suburbanization. African American residents especially have experienced problems as a result of rising property values and taxes when areas are converted from rural to suburban.

6. **Noise Pollution** – The residents remaining in close proximity to the Mark Clark extension will be severely impacted by noise from traffic – especially those living on Johns and James Islands. The 1995 EIS reveals that all alternatives would cause a “substantial noise increase” in at least 55 receptors. One alternative would cause a total of 96 substantial increases in receptors. All alternatives would have at least 19 receptors that “approach or exceed the FHWA noise abatement criteria.”
7. **Viewshed Pollution** – Many people who live along the Stono River on James and Johns Islands will have their property values and their enjoyment of the viewshed diminished due to the close proximity of the Mark Clark.

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The entire project **will be a very attractive and economically feasible undertaking** with other \$1,135 Million in discounted benefits, against a discounted cost of \$366 Million. This results in a **Gross Benefit/Cost ratio of 3.347 with over \$797 Million in Net Present Value.**

RESPONSE

The analysis upon which this statement is based is flawed because the applicant has not demonstrated or analyzed aggregate changes in traffic congestion. As the COG maps show, many miles of the regional road system will decline in performance. More than 40 miles of road will actually experience a drop in one or more levels of service because of the Mark Clark extension.

APPLICATION, P. 11

PROMOTION OF ECONOMIC DEVELOPMENT

The US Department of Transportation (USDOT) study calculates that every \$1 billion dollars of highway spending by the federal government will lead to what USDOT analysts describe as “employment benefits” totaling 47,576 person-years. Using these figures, the investment of \$420 million on the Extension of the Mark Clark Expressway will have the following effects:

- First-round effects total 8,224 person-years, comprised of 5,230 jobs in the highway construction sector and 2,995 jobs in industries supplying equipment and materials (e.g., stone, concrete rebars, and fuel).
- Second-round effects total 2,914 person-years of indirect employment caused by additional production demands in industries that supply highway construction materials (e.g., iron and steel, financing, insurance, repair, and chemicals).
- Third-round effects of 8,841 person-years result from spending by the workers employed in the first two rounds on consumer goods (e.g., DVDs, Big Macs, baseball caps, hockey tickets, bourbon, socks, magazines and home repair).
- As the \$420 million dollars of highway spending works its way through the economy, this input/output (I/O) analysis contends that the money will produce the equivalent of 19,982 jobs for one year.

RESPONSE

This analysis assumes that the choice before Charleston County is to build the Mark Clark extension or nothing at all. A more accurate characterization would be to compare the Mark Clark extension with a suite of other road improvement projects that would accomplish the goal of reducing congestion and increasing mobility. These road projects could be comparable in cost and would have an equivalent impact on the economy of Charleston County. A different group of projects might also have a greater benefit to the mobility of the region.

APPLICATION, P. 11

We also anticipate that the improvements will help enhance tourism opportunities by reducing frustrating delays and accidents. Tourists visit the Charleston area for many reasons: cultural performances, the Atlantic Ocean, beaches, golf, fishing and other sport recreations. Access via the Mark Clark Expressway will give travelers additional options for reaching these sites in a safe and efficient manner. It is also anticipated that by making the road safer and reducing congestion, commerce along the corridor will be more efficient, thus resulting in significant savings to the motorists. The cumulative impact of congestion in this corridor costs the region billions of dollars a year.

RESPONSE

There is no evidence that tourists are deterred from coming to Charleston because of having to drive down Maybank Highway or Highway 17 to get to Kiawah and Seabrook Island. Nor is there evidence that another bridge would bring more tourists to Kiawah or Seabrook. The application makes statements that are entirely speculative and not defended by supporting documentation. We acknowledge there are congestion points along the route between the airport and Johns Island. These can be addressed through a combination of smaller projects.

APPLICATION, P. 13-15

A.1.1.2 Projected Traffic Volumes

The results presented below were obtained through analysis of the CHATS traffic model, with adjustments to the data that reflect changes anticipated through implementation of the Charleston County Comprehensive Transportation Plan. The base data of the CHATS model was derived from SCDOT traffic counts.

If constructed, the extension of the Mark Clark Expressway, (I-526), is projected to carry approximately 60,000 vehicles daily from US 17 (Savannah Highway) to Maybank Highway and 35,000 vehicles daily from Maybank Highway to the James Island Expressway in 2030.

The construction of the Mark Clark Expressway extension would reduce daily traffic on various roadways in the James Island and Johns Islands areas by providing drivers an additional, more direct route to the existing roadway network. For example, constructing the Mark Clark Extension would reduce the projected 2030 daily traffic volumes along US 17 (Savannah Highway) to about

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their current level despite the anticipated increases in population that are expected in the area and throughout Charleston County.

Roadways projected to experience a reduction in 2030 daily traffic volumes (compared to volumes if the Mark Clark were not constructed) after completion of the Mark Clark Expressway extension include:

Savannah Highway (US 17) directly west of the Mark Clark Expressway (from approximately 49,000 to approximately 43,000 vehicles per day) and directly east of the Mark Clark Expressway (from approximately 43,000 to approximately 36,000 vehicles per day);

James Island Expressway from the proposed SC 61 Connector to Harborview Road: (from approximately 76,000 to 59,000 vehicles per day);

Maybank Highway between the proposed MARK CLARK EXPRESSWAY extension and Riverland Drive (from approximately 40,000 to approximately 21,000 vehicles per day);

Bees Ferry Road (from approximately 33,000 to approximately 24,000 vehicles per day west of the Glenn McConnell Parkway and from approximately 21,000 to approximately 15,000 vehicles per day east of the Glenn McConnell Parkway);

Main Road directly south of Savannah Highway (US 17) (from approximately 27,000 to approximately 12,000 vehicles per day);

River Road between Main Road and Brownswood Road (from approximately 9,600 to approximately 2,600 vehicles per day).

Other roadways expected to see a reduction in traffic with the extension of the Mark Clark Expressway include:

Maybank Highway east of the proposed Mark Clark Expressway extension;

Folly Road north of Harborview Road;

Harborview Road east of James Island Expressway;

James Island Expressway south of SC 61 Connector;

Main Road from Savannah Highway (US 17) to Bohicket Road;

River Road between main Road and Murraywood Road; and,

Brownswood Road from River Road to Main Road.

The extension of the Mark Clark Expressway may also increase traffic on a few roads in the area. The roadway section most impacted by the extension of the Mark Clark Expressway is Maybank Highway west of the proposed extension to the intersection with Bohicket Road. This section of Maybank Highway would receive more traffic as a result of the Mark Clark Expressway being constructed between US 17 and Folly Road. Traffic on Maybank Highway between the proposed extension and River Road is projected to increase from approximately 38,000 to approximately 59,000 vehicles per day. Traffic also increases between 8,000 to 14,000 vehicles per day along Maybank Highway between River Road and Main Road/Bohicket Road. These increases in traffic reflect the redistribution of traffic along the more direct route made up by the extension and Maybank Highway instead of the more circuitous

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routes taken along Savannah Highway, Main Road, River Road, Bees Ferry Road, and other roads in the area, which would result in a reduction in vehicle miles traveled for the same trips.

RESPONSE

Several roads will benefit from the Mark Clark and while conditions on other roads will deteriorate. But it is necessary to better quantify these statements. The applicant offers no means by which to measure the statement about improvements. Our response focuses only on those roads that will experience a *measurable* change due to the extension of the Mark Clark.

The SC Department of Transportation (SC DOT) uses Level of Service (LOS) standards to help quantify the conditions of a particular segment of road. In the COG scenario maps, mentioned in the application above, data was collected to help better understand the effects the Mark Clark will have on roads across the region based on Level of Service standards set by the SC DOT.

That analysis revealed three main points:

1. The Mark Clark extension will negatively impact miles of road than it will improve.
2. The Mark Clark extension will cause conditions on already failing roads in the Charleston community to further deteriorate.
3. The extension of the Mark Clark will cause more people traveling in the Charleston metropolitan region to experience delays.

(All tables are based from information gleaned from Figure 1 in Appendix A.)

1. The Mark Clark Extension will negatively impact more miles of road than it will improve.

- Out of a total of almost 65 road miles that will see a level of service change, 67% of those road miles will get worse.

CCL Table 1A: Total miles experiencing LOS changes due to Mark Clark Ext.

<i>Affect</i>	<i>Number of miles</i>
<i>Negative</i>	43.6
<i>Positive</i>	21.2

- Many of these roads are of regional significance, including approximately 4 miles of the current Mark Clark Expressway (LOS B to D and LOS E to F) and approximately 4 miles of I-26 (LOS C to D).

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- Other roads that will drop at least one level of service are Highway 61 (9.3 miles), River Road (12.8 miles), Bohicket Road (9.9 miles) and Maybank Highway (3.9 miles).
- 2. The Mark Clark Extension will cause already failing roads to further deteriorate.** (VPD = vehicles per day)
- Out of the miles of road in the Charleston region that are predicted to fail with or without the Mark Clark extension by 2030, 12.2 miles of road “fail worse” because of the extension.
 - The Mark Clark extension will cause 1.8 miles of road to drop to a LOS F.
 - While a total of 14 miles of LOS F roads will either fail or “fail worse” because of the Mark Clark extension, 4.7 miles will be elevated from a LOS F to a better level of service.

CCL Table 2A: Failing roads (LOS F) that will be worse due to the Mark Clark Extension (2030 predictions)

Road	Miles	Average VPD
<i>I-526 (Glenn McConnell Pkwy to Dorchester Road)</i>	3.4	45,829
<i>SC 61 (McLaura Hall Avenue to Bees Ferry Road)</i>	1.7	19,890
<i>North Rhett Ave. (I-526 to Valley Street and Yeamans Hall Road to Red Bank Road)</i>	4.5	45,951
<i>Folly Road (James Island Connector to Camp Rd)</i>	0.9	48,561
<i>Cosgrove Avenue (Orange Grove to Rivers Ave)</i>	1.7	63,066
Total	12.2	

CCL Table 2B: 2030 Roads that will fail because of the Mark Clark Extension

Road	Miles	Average VPD
<i>Maybank Highway (River to Mark Clark)</i>	0.8	5,862
<i>Mark Clark (Leeds Ave. to I-26)</i>	1.1	41,549
Total	1.9	

CCL Table 2C: 2030 Roads that will be prevented from failing by Mark Clark

Road	Miles	Average VPD
<i>Maybank Highway (Stono River to Riverland Road and Woodland Shores to Folly Road)</i>	1.4	19,583
<i>Main Road (River Road to 17)</i>	1.9	9,832
<i>Bohicket Road (Maybank to Plowground)</i>	1.0	17,052
<i>Folly Road (Tatum Road to Harborview)</i>	0.4	27,631
Total	4.7	

3. The extension of the Mark Clark will cause more people traveling in the Charleston metropolitan region to experience delays. (VPD = vehicles per day)

- As stated above, 43.6 miles of road will drop a level of service due to the Mark Clark extension while 21.2 miles will experience congestion relief.
- Further breakdown of these numbers reveals that approximately 11.6 miles of Charleston's most highly traveled roads will drop a level of service due to the extension of the Mark Clark.
- The Mark Clark extension will relieve congestion (one level of service or more) on approximately 3.4 miles of the most highly traveled roads.

CCL Table 3A: Average VPD on roads due to experience negative LOS changes in 2030 as a result of the Mark Clark Ext.

<i>Road profile (vpd)</i>	<i>Miles of road affected</i>
<i>>35,000</i>	<i>11.6</i>
<i>15,000 to 35,000</i>	<i>9.9</i>
<i><15,000</i>	<i>22.1</i>

CCL Table 3B: Average VPD on roads due to experience positive LOS changes in 2030 as a result of the Mark Clark Ext.

<i>Road profile (vpd)</i>	<i>Miles of road affected</i>
<i>>35,000</i>	<i>3.4</i>
<i>15,000 to 35,000</i>	<i>7.5</i>
<i><15,000</i>	<i>10.3</i>

APPLICATION, P.16

A.1.2 Urgency of the Project

Since the 1980's, the Mark Clark Expressway has been a project of significance for Charleston County. It has been included in the CHATS program for decades, but lack of funding has hampered efforts to complete the highway. With continued development, traffic pressures are increasing and gridlock is not far behind.

RESPONSE

The applicant does not explain or justify the urgency of this project except to say that it has been on a list for 25 years. Simply stating that this project has been on a list for 25 years is no reason to move forward with the project, especially when the need and benefits have not been proven. In fact, the counter argument could be made that the project sat on a list for 25 years because it was not urgent.

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While the South Carolina coastal region, unlike the Gulf coast, was spared the disastrous effects of a major hurricane in 2005, it is inevitable that a major storm will impact the Charleston area sometime in the future. The completion of the Mark Clark Expressway will add capacity to evacuation routes from Seabrook, Kiawah, Johns, and James Islands. Evacuation due to a hurricane is never a quick process, but completing the Mark Clark Expressway will relieve some of the

Coastal Conservation League comments to Charleston County South Carolina State Infrastructure Bank application

gridlock on US Highway 17 and will allow faster flow to I-26 and other alternative routes away from the coast.

RESPONSE

As evidenced by hurricanes Hugo and Floyd, major traffic arteries leading out of the region (I-26, US 17 and US 52) have historically been where evacuees experience bottlenecks. There are many routes residents can choose to take between Johns and James Islands and main arteries leading out of the region. Adding one more route to bring people to the chokepoints is not going to improve evacuation in the event of a hurricane.

APPLICATION, P. 17

A.1.5 Local Support of the Project

As with any large transportation development project, there are proponents as well as opponents to the project. CHATS has demonstrated its support of the Completion of the Mark Clark Expressway by including this project in its long-range plan for many years. The residents of Charleston County recognized the importance of highway improvements when their votes approved the *Half-Cent Transportation Sales Tax* in November 2004. With this application to the State Infrastructure Bank, Charleston County Council, elected by the citizens of the County, and the elected representatives of the Town of Mount Pleasant, the City of Charleston, the Town of North Charleston, and various Chambers of Commerce are lending their voices as representatives of the people to support this application.

RESPONSE

The region is divided on this issue. During a recent set of public hearings on transportation, approximately 50% of the people who spoke of the Mark Clark extension were opposed. This opposition is impressive given that very little public discussion about the project has occurred in over 10 years.

James and Johns Island residents are speaking out in opposition to the extension. The Johns Island Rural Transportation Alliance has written a letter to the County Transportation Committee asking for improvements for roads on Johns Island instead of the extension of the Mark Clark. The towns of Kiawah Island and Seabrook Island have also written the CTC asking them to improve roads on Johns Island before extending the Mark Clark. These two towns do not support the construction of the Mark Clark extension before local improvements take place. These letters are provided as a part of this response.

The James Island Public Service District passed a resolution opposing the extension of the Mark Clark, due to the impacts the road would have on the community. The resolution cites increased traffic congestion, impact on property owners and the environment as reasons for opposition. The resolution is provided as a part of this response.

APPLICATION, P. 18

A.1.6 County, Municipal, and Chamber of Commerce Resolutions

The following entities have passed resolutions and, in some cases, provided additional information in support of Charleston County's application to the State Infrastructure Bank for funding to complete the Mark Clark Expressway.

- Charleston County Council
- Charleston Area Transportation Study (CHATS)
- Charleston Legislative Delegation
- SC Coordinating Council for Economic Development
- The City of Charleston
- The Charleston Chamber of Commerce
- The Town of Seabrook Island

RESPONSE

The Johns Island Rural Transportation Alliance is formally opposed to the project and has written a letter to the Charleston County Transportation Committee asking for road improvements to Johns Island rather than the Mark Clark extension. Kiawah and Seabrook Islands have also requested that the CTC improve conditions on Johns Island roads before the Mark Clark is built. Finally, James Island Public Service District commissioners passed a resolution opposing the Mark Clark extension due to the lack of public benefit and the impact the project would have on the island. All aforementioned letters are attached as a part of this response.

APPLICATION, P. 18-19

A.1.7 Regional and Statewide Significance of the Road

Construction of the Mark Clark Expressway extension will complete an important interstate highway link that has been discussed for decades. This connection is important to the region as a commuter highway, a hurricane evacuation route, and a tourist route for access to/from James, Johns, Kiawah, and Seabrook Islands. The Project will add significant capacity during the normal tourist seasons, facilitate the daily commute of residents, and add much needed capacity in the event of disasters and emergencies.

Significant benefits to the affected communities, the region, and to the state itself include:

- Promoting hurricane evacuation from James Island and Johns Island;
- Reducing congestion along SC 700 (Maybank Highway) and US 17;
- Improvement to the transportation system as a whole by offering more options to commuters and freight carriers;
- Facilitation for the movement of military personnel and equipment; and,
- Improved regional air quality, which offers environmental benefits.

Coastal Conservation League comments to Charleston County South Carolina State Infrastructure Bank application

Although the entire State of South Carolina and the South Carolina Department of Transportation will benefit greatly by having a more effective and efficient transportation and highway system, the primary benefactors of this project are the commuters in the greater Charleston area.

RESPONSE

The Mark Clark Expressway is part of the Charleston regional transportation system but it is not a road of statewide significance. The road is in no way analogous to US 17, the Cooper River Bridge and I-26. The asserted regional benefits are also questionable.

Promoting hurricane evacuation from James Island and Johns Island: As evidenced by hurricanes Hugo and Floyd, major traffic arteries leading out of the region (I-26, US 17 and US 52) have historically been where evacuees experience bottlenecks. There are many routes that residents can choose to take between Johns and James Islands and the main arteries leading out of the region. Adding one more route to bring people to the chokepoints is not going to improve hurricane evacuation.

Reducing congestion along SC 700 (Maybank Highway) and US 17: The COG models show that although congestion may be reduced on portions of SC 700 and US 17, other sections of those roads, and other roads in the region, will experience more congestion.

Improvement to the transportation system as a whole by offering more options to commuters and freight carriers: Almost 12 miles of our heaviest traveled roads will drop at least one level of service due to the extension of the Mark Clark. A total of almost 44 miles will drop at least one entire level of service due to the extension. I-26, our most important truck route, will get worse.

Improved regional air quality, which offers environmental benefits: The applicant offers no evidence that air quality will be improved due to the Mark Clark extension. Until such analysis exists, such a statement can not be evaluated.

APPLICATION, P. 19

BENEFITS TO THE STATE'S ECONOMIC CONDITION

An efficient, safe, congestion free transportation system is key to maintaining and enhancing a region's economic vitality. A sub-standard highway system results in an area becoming less attractive for economic development. The improvements of this portion of the Mark Clark Expressway will support the continued economic vitality of communities throughout the corridor and increase accessibility for those who use it for work, shopping, or visiting tourist attractions. The Project will also have spin-off benefits for the entire region. Not only will the actual construction create thousands of new jobs for the entire construction period, but the widening itself, by addressing safety

Coastal Conservation League comments to Charleston County South Carolina State Infrastructure Bank application

and congestion issues, will make the region more attractive to new and expanding businesses.

RESPONSE

The applicant has produced no evidence, no analysis, and no studies that support the assertion that the Mark Clark extension will provide a new benefit to the state's economy. There is a fixed amount of money available to improve the state's transportation system. The question is not whether the Mark Clark will add new jobs through the construction of the roadway but whether the Mark Clark will produce more economic benefits than a suite of alternative road projects that cost a comparable amount of money constructed all over the state.

APPLICATION, P. 38

2.4 Amount of Assistance Required

Charleston County respectfully requests \$420 million for the Completion of the Mark Clark Expressway and \$300 million for the design and construction of the Port Access Road and railroad overpasses for a total funding request of \$720 million. The local contribution of \$354 million will comprise 33 percent of the total \$1.074 billion program.

RESPONSE

Charleston County Council has not yet determined how they are going to spend sales tax revenues. Charleston County's statement that they are going to spend \$253 million on improvements to state and federal roads is premature and should not be considered as an adequate match because the sales tax road projects in Charleston County have not been determined nor have dollar allocations been made.

APPLICATION, P. 45

Charleston County will spend \$354 million in local funds improving SCDOT roads, thereby relieving SCDOT of the responsibility of maintenance for those roads involved in the improvements. This effort will more than offset the maintenance costs associated with the Mark Clark Expressway and the Port Access Roads/Railway overpasses for which funding is requested in this application.

RESPONSE

If Charleston County is permitted to use the \$253 million as a match for the project and if they use that money on state roads, by no means would the improvements to the roads relieve SCDOT of the responsibility of maintenance for those roads. The County isn't offering to take those roads out of the state system. Until that happens the state would still be responsible for maintenance associated with these roads.

APPLICATION

2.11.1 Contingency Plan

Coastal Conservation League comments to Charleston County South Carolina State Infrastructure Bank application

Should the SIB Board grant less than the amount requested for both projects, it is our intention to move forward on the Mark Clark Expressway and await further funding from the SIB or the State Legislature to proceed with the Port Access Road.

RESPONSE

The benefits of the Port Access Road are demonstrable and significant, where the benefits of the Mark Clark extension are questionable, at best. There is a broad consensus that the port is an important state asset. Although Charleston County has done so, the Infrastructure Bank should not prioritize the Mark Clark extension, a regional road, over the significant Port Access Road.

APPLICATION

A.3.2 Description of the Current Project Status

The Mark Clark Expressway Extension Project has already completed the NEPA process through the EIS process and public hearing milestones. The “Draft Supplemental EIS (DEIS), dated August 1995” along with the original “Final EIS, dated December 1980” may require updating and possibly additional environmental studies.

RESPONSE

The NEPA process will need to be restarted from scratch because the input and the EIS are outdated.

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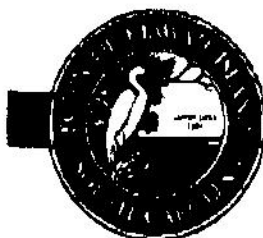
Appendix A

Roads that will be impacted by the Mark Clark extension, indicated by level of service change (+ or -)

Road	Distance (miles)	Average VPD w/ Mark Clark	Impact of Mark Clark	Location of Road
Maybank Highway (Main to Mark Clark)	3.9	42,022	Negative	Johns Island
River Road (Betsy Kerrison to Maybank Highway)	12.8	12,749	Negative	Johns Island
Bohicket Road (Edenvale to Kiawah Island)	9.9	19,524	Negative	Johns Island
I-526 (Highway 17 to Glenn McConnell and Dorchester Road to I-26)	3.9	41,272	Negative	West Ashley/North Charleston
Highway 61 (165 to McLaura Hall Avenue)	9.3	9,063.5	Negative	West Ashley
I-26 (Aviation to Ladson Road)	3.9	58,811.5	Negative	North Charleston
Maybank Highway (Mark Clark to Folly Road)	3.5	18,720	Positive	James Island
River Road (Main to Murraywood)	3.7	2625.5	Positive	Johns Island
Main Road (Highway 17 to Maybank Hwy)	6.6	8,670.6	Positive	Johns Island
Bohicket (Maybank to Plowground)	1.1	16,962	Positive	Johns Island
Folly Road (Tatum Rd to Harborview)	0.4	27,631	Positive	James Island
Folly Road South	0.3	26,883	Positive	James Island
Bees Ferry Road (Main to Glenn McConnell)	2.3	24,702.5	Positive	West Ashley
Glenn McConnell (Bees Ferry Rd to Tobias Gadsden Road)	2.5	48,210	Positive	West Ashley
Highway 17 (Oak Forest to White Oak Rd.)	0.8	37,601	Positive	West Ashley

Appendix B

**Letters from
Town of Kiawah Island
Town of Seabrook Island
Johns Island Rural Transportation Alliance
James Island Public Service District Commission**



TOWN OF KIAWAH ISLAND

21 BEACHWALKER DRIVE • KIAWAH ISLAND, SC 29455 • (843) 788-9100 • FAX (843) 788-4764

November 14, 2005

Mr. Howard Chapman, Chairman
County Transportation Committee
4045 Bridge View Drive
North Charleston, SC 29405

William G. Wert, Mayor

Council Members
Alan I. Burnaford
Charles R. Lipuma
Donald H. McIvor, Jr.
G. Steven Orban

Town Administrator
Allison B. Harvey

Dear Mr. Chairman:

On behalf of the Town of Kiawah Island, I would like to follow up on our letter of September 19, 2005, concerning the Half Cent Sales Tax prioritization.

Road improvements on Johns Island are needed to meet safety, mobility and economic needs in the entire Johns, Wadmalaw, Seabrook and Kiawah Island communities.

Improvements to the Bohicket and Main Road corridor on Johns Island, to include intersection improvements at Highway 17 and Main Road should be funded. These improvements can include creating a parkway the length of Bohicket and Main, otherwise widening the roads as needed to meet the above concerns, adding turning lanes or a third lane, and/or the use of other sensible, cost-effective and sensitive alternatives which protect the people, the canopy of trees and the environment of our community.


This corridor is one of the most beautiful and scenic in the state, and is well known for the famous over-arching canopy of oaks. Any work to be done on this corridor will require special consideration to protect the historic communities, the beautiful oak canopies, clusters of trees and the otherwise rural nature of the road.

This request assumes the following:

- The improvements can be phased if necessary;
- Improvements can be made to existing traffic corridors and will not necessarily include new roadways;
- Improvements will extend the length of the corridor from Highway 17 to the Betsy Kerrison Parkway; and
- Citizens will be integrally involved in the process.

The Town respectfully requests consideration of this request.

Sincerely,


William G. Wert
Mayor

cc: Town Council
The Honorable Leon Stavrinakis
Jim Hutto, Charleston County Public Works
John L. Knott Jr., Charleston County Transportation Advisory Board
John Boylston, RoadWise

Town of Seabrook Island
2001 Seabrook Island Road
Seabrook Island, SC 29455
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November 15, 2005

Mr. Howard Chapman, Chairman
County Transportation Committee
4045 Bridge View Drive
North Charleston, SC 29405

Dear Mr. Chapman:

In a letter dated October 31, 2005, James D. Armstrong, Program Coordinator for the Charleston County Transportation Committee, asked Mayor John B. DuBois for any comments the Town of Seabrook might have on road projects affecting our community. Please excuse our delay in responding, which is the result of our recent elections.

We are very concerned with the road system across Johns Island as it exists today. This concern is heightened by the focus being placed on the Mark Clark extension to James Island. While we believe that this project should go forward, it should not be undertaken prior to providing relief to the ever-increasing traffic on Johns Island roads. Funds should be provided to address the safety and traffic flow issues on Bohicket, Main and River roads. Widening these roads to add more lanes would help to alleviate these problems, which are becoming more aggravated over time. The Mark Clark extension, in and of itself, is not the solution for either Seabrook Island or Johns Island. In fact, it would increase Johns Island's traffic problems.

It is thus our opinion that a high priority should be placed on providing relief to these Johns Island roads, including the Main Road/Savannah Highway intersection.

Sincerely,



Frank W. McNulty
Mayor

Johns Island Rural Transportation Alliance, Inc.
P.O. Box 602
Johns Island, SC 29457

November 15, 2005

Mr. Howard Chapman, Chairman
County Transportation Committee
4045 Bridge View Drive
North Charleston, SC 29405

Dear Mr. Chapman,

On behalf of the Johns Island Rural Transportation Alliance, Inc., we are submitting the following project to your committee for CTC and ½ Cent Sales Tax funding. This request is to meet safety, mobility and economic needs on this growing sea island and surrounding areas.

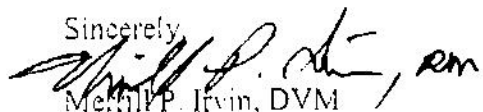
Improvements to the Intersection of Main Road and Hwy 17 and to existing traffic corridors on Johns Island: We request that improvements be made to the existing traffic corridors on Johns Island, to begin with the intersection improvements at Hwy 17 and Main. These improvements can include adding turn lanes or a third lane passing lane or creating a parkway from Hwy 17 along the entire length of Bohicket, Main and River Roads. This includes the use of other sensible, cost-effective and context sensitive alternatives, which protect the people, the canopy of trees and rural environment of Johns Island.

This corridor is one of the most beautiful and scenic in the state, and is well known for the famous over-arching canopy of oaks. Any work to be done on this corridor will require special considerations, by experts with expertise in context sensitive design, to protect the historic communities, the beautiful oak canopies and clusters of trees, and the otherwise rural nature of the road.

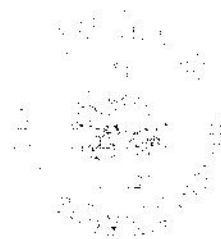
This request assumes the following:

- That the improvements can be phased if need be.
- That improvements will be made to existing traffic corridors only and will not include *any* new roadways.
- That improvements will extend the *entire* length of the corridor from Hwy 17 to the Betsy Kerrison Parkway
- That any designs will be done by an outside engineering firm with experience in context sensitive design relating to environmental and cultural issues as is provided by the University of Kentucky's Kentucky Transportation Center.
- That citizens of Johns Island will be integrally involved in the process.

Sincerely,


Merrill P. Irvin, DVM
Director

Rod Welch, Chair
Donald A. Hollingsworth, Vice Chair
Michael M. Smith, Secretary
Inez BrownCrouch
Eugene Platt
Charles Rhodes
June Waring
Robert Wise, District Manager



1739 Signal Point Road
P.O. Box 12140
Charleston, SC 29422-2140

Phone:(843) 795-9060
Fax:(843) 762-5240

JAMES ISLAND PUBLIC SERVICE DISTRICT

November 30, 2005

Mr. Donald D. Leonard, Chairman
South Carolina Transportation State Infrastructure Bank
955 Park Street, Room 102
Columbia, South Carolina 29201

Dear Mr. Leonard:

The James Island Public Service District Commission met on November 29, 2005, and passed Resolution No. 2005-07 opposing the completion of the Mark Clark Expressway. Enclosed is a copy of that resolution.

We are not opposed to the construction of an access road to the new SC State Ports Authority terminal at the Charleston Navy Yard property.

If the Infrastructure Bank truly wants to make evacuating the Charleston area easier, I hope you will seriously consider adding a third lane to the westbound side of I-26 all the way to I-95. Our problem is not getting off of our islands. It's sitting on I-26.

Sincerely,

A handwritten signature in cursive script that reads "Rod Welch".

Rod Welch, Chair
JIPSD Commission

RW/te

Attachment

cc: JIPSD Commission

A RESOLUTION NO. 2005-07
BY THE JAMES ISLAND PUBLIC SERVICE DISTRICT COMMISSION
OPPOSING THE COMPLETION OF THE MARK CLARK EXPRESSWAY

Adopted November 29, 2005

- WHEREAS** The James Island Public Service District Commission is composed of duly elected representatives of the citizens of James Island and, as the only elected representatives serving exclusively more than 22,000 citizens of James Island, it is appropriate for the Commission to state an official position on important issues affecting those citizens; and
- WHEREAS** The Commission previously passed Resolution No. 01-05, adopted March 19, 2001, opposing the completion of the Mark Clark Expressway; and
- WHEREAS** Projections indicate that completion of the Mark Clark Expressway onto James Island would create as many or more traffic problems on the island (and elsewhere) as it would solve; and
- WHEREAS** Completion of the Mark Clark Expressway onto James Island would make it more difficult and dangerous for eastbound drivers to enter the James Island Expressway on their way to downtown Charleston; and
- WHEREAS** Experience has repeatedly shown that while new expressways may reduce traffic congestion for a short while, they soon promote rapid land development, urban sprawl, and even worse traffic congestion; and
- WHEREAS** The urban sprawl promoted by the completion of the Mark Clark Expressway would fundamentally degrade the quality of life of many of our neighbors on Johns Island and Wadmalaw Island; and
- WHEREAS** Construction and use of an extended Mark Clark Expressway would pollute the Stono River and its associated creeks, and damage and pollute James Island and Johns Island marshes and wetlands; and
- WHEREAS** Completion of the Mark Clark Expressway onto James Island would cause many James Island and Johns Island residents near the path of the expressway to lose their homes and businesses, and would reduce property values for many others;

NOW, THEREFORE, BE IT RESOLVED, The James Island Public Service District Commission reaffirms its opposition to the completion of the Mark Clark Expressway onto James Island.

NOW, THEREFORE, BE IT FURTHER RESOLVED, The James Island Public Service District Commission specifically and publicly requests the aid of State Representative Wallace Scarborough and State Senators Chip Campsen and Glenn McConnell in deterring any South Carolina state agency from advancing completion of the Mark Clark Expressway.

IN MEETING DULY ASSEMBLED, this 29th day of November 2005

(SEAL)


Chairman, JIPSD Commission


Secretary, JIPSD Commission