



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 29, 2017

Tarek Ravenel
Palmetto Railways
540 East Bay St
Charleston, SC 29403

Re: Docket No. FD 36095, Palmetto Railways – Petition for Exemption – In Berkeley County, South Carolina; Information Request #2

Dear Mr. Ravenel:

Consistent with 40 C.F.R. § 1506.5(a), we request the information listed below to assist the Surface Transportation Board's Office of Environmental Analysis in the environmental review in the above-referenced proceeding.

1. The Environmental Report states that it is anticipated that five trains per week would travel over the proposed rail line to the Camp Hall Commerce Park. Please provide further detail on the basis for this estimate. In particular, is this estimate for anticipated rail traffic for Phase I of the Volvo Cars plant only? If so, please provide an estimate of potential additional rail traffic associated with Phase II and with other anticipated development of the Commerce Park.
2. Please provide additional information on the train consist of the anticipated rail traffic, including the number of locomotives per train, the type and length of the estimated 30 cars per train, and the approximate number of automobiles that could be transported on each auto rack rail car.
3. Please provide the anticipated average speed of trains moving over the proposed rail line.
4. Please provide the typical number of round-trip trains per week on the existing spur line between the Santee Cooper Cross Generating Station and the CSXT mainline. In addition, please provide the typical average train speed, number of locomotives per train, number of railcars per train, and overall train length.
5. Please provide of a description of changes, if any, to existing rail lines that would be associated with each of the Level 2 alternatives considered in the Environmental Report. For example, would a Wye or siding need to be added?
6. Maps included with the Environmental Report in Appendix A show Level 2 and Level 3 alignments terminating at the boundary of the Camp Hall Commerce Park. Please provide information in GIS file format that shows the continuation of these alternative alignments to the same two destinations within the Commerce Park that have been provided for the proposed route (referred to as Cross 3 in the Environmental Report).
7. Would it be feasible to shift the Soter South alignment in the vicinity (~+/- 1 mile) of the crossing of Jedburg Road to pass southwest of the electric substation and cross Jedburg Road in the vicinity of Hardwood Lane to reduce potential impacts to area residents? If so, please provide a revised alignment in GIS file format. If not, please explain why.

8. Would it be feasible to shift the location of the Moncks Corner alignment to avoid crossing the proposed Caton Creek stream and wetland mitigation bank? If so, please provide a revised alignment in GIS file format. If not, please explain why.
9. The Environmental Report states that a generalized route for four alternative alignments (i.e., Cross, Moncks Corner, Soter North, and Soter South) was developed and a study area for each, defined as a 1-mile buffer surrounding each generalized route (2-mile total width), was evaluated. Within the Environmental Report, the Level 2 analysis provides the potential impacts to different criteria, often using a 200' right-of-way for quantifying impacts of the four alternative alignments. At the conclusion of the Level 2 analysis, four additional alternatives were developed for the Cross alignment because the generalized route was not optimized to reduce environmental, economic and socioeconomic impacts. Please provide clarification on how the optimized routes for the Cross alternatives were developed and any information, if available, on other optimized routes for other alignments.
10. If the conclusions for the Level 2 analysis were based on a 200' generalized route (versus the 2-mile wide study area), were other routes evaluated for the Moncks Corner, Soter South, and Soter North generalized routes (as was done for the Cross generalized route) that may have had fewer potential impacts? Please explain the factors that were evaluated within the 2-mile study area and how those factors were used to determine the potential routes and impacts within the study area.
11. Please provide the project area corridor and all wetlands verified in the April and August 2017 Preliminary Jurisdictional Determinations in GIS file format.
12. The Environmental Report indicates that disturbance limits would extend approximately 180 feet surrounding the Diversion Canal. For all alignments considered in the Level 2 and 3 analysis, please provide, in GIS format, all locations where (1) a ROW width of more than 100 feet would be required and (2) additional locations, if any, where disturbance outside the 100-foot ROW would be anticipated during construction. Also, please clarify why the petition for exemption requests a 100 foot ROW while the Alternatives Analysis in the Environmental Report used a 200 foot corridor.

Thank you for your assistance in this matter. Please feel free to contact Diana Wood of my staff at 202-245-0302 or by email at Diana.Wood@stb.gov, if you have any questions. I would appreciate two copies of your response, one sent to Diana Wood at 395 E Street SW, Washington DC 20423 or by email at the above address, and one sent to David Bauer of ICF, our independent third-party consultant, at 9300 Lee Highway Fairfax, VA 22031 or by email at David.Bauer@icf.com. We look forward to receiving this information at your earliest convenience, but no later than December 12, 2017.

Sincerely,



Victoria Rutson
Director, Office of Environmental Analysis