



Victoria Ruston, Esq.
Director, Office of Environmental Analysis
U.S. Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

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

Dear Ms. Ruston,

Please let this letter serve as Palmetto Railways' response to your letter dated November 29, 2017, requesting information to assist the Surface Transportation Board's Office of Environmental Analysis in the environmental review in the above referenced proceeding. Your questions are set forth below followed by Palmetto Railways responses.

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.

RESPONSE:

The estimate of five trains per week was taken from the total volume of cars expected to be produced by Volvo Cars, which accounts for the volume for two Volvo vehicle product lines at full production (i.e., for Volvo "Phase One and Phase Two"). Because no additional tenants have been identified for the remainder of the available Camp Hall Commerce Park acreage, Palmetto Railways (PR) has not accounted for any additional volume from future tenants, as it would be purely speculative at this time. If additional tenants requiring access to and generating rail volumes do materialize at the Camp Hall Commerce Park, it is an operational assumption that the length of the five weekly trains would need to grow considerably before additional weekly train pairs were added on the proposed rail line.

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.

RESPONSE:

PR has not determined if there would be one or two locomotives needed as the cargo loads and grades of the line have yet to be defined. It is assumed that there will be approximately 30 bi-level and tri-level auto racks (approximately 95' long) each carrying 10-15 automobiles dependent on the vehicle type (sedan or SUV).

3. Please provide the anticipated average speed of trains moving over the proposed rail line.

RESPONSE:

The proposed line will be maintained to FRA Class 2 standard with a maximum operating speed of 25 mph.

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.

RESPONSE:

The information requested above is not information to which PR would ordinarily be privy or capable of independently verifying. Notwithstanding, PR posed the provided questions to Santee Cooper and received the following responses:

The estimated average per week train volumes from Cross Generating Station to and from CSX is seven round trip trains per week, carrying three CSX locomotives and 110 coal gondola cars at 55 ft. each (approximate train length including three locomotives is 6,275 ft.). Cars are loaded inbound to the generating station and empty outbound from the generating station. The estimated speeds on the CSX Cross Subdivision between the Cross Generating Station and the CSX A Line are 10-15 mph. The FRA Class is unknown to PR at this time.

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?

RESPONSE:

It can be assumed that either a siding or new interchange track would be required at any of the Level 2 alternatives similar to that being proposed in the preferred alternative. The exact configuration was never vetted fully as those alternatives were not carried forward beyond Level 2 for detailed alignment-specific evaluation.

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).

RESPONSE:

The requested information is enclosed and submitted with this response, including GIS files and a KMZ file. With respect to the Soter South alignment, however, please note PR's response to Question #7 below, which addresses PR's current opinion as to the ability of the Soter South alignment to fulfill the basic minimum requirements and proposed purpose and need (i.e., Level 1 characteristics and criteria) of the proposed project.

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.

RESPONSE:

The described shift would be feasible and is shown in the enclosed KMZ file; however, as discussed during the December 5, 2017 telephone conference with representatives of the STB, ICF, and the Corps, PR has re-evaluated the viability of the Soter South alignment alternative in light of information that was unknown to PR at the time that it developed the Environmental Report and alternatives analysis. As discussed below, because information provided to PR since the submission of the Environmental Report, when combined with the alternative's inability to fulfill other key characteristics and criteria, suggests that the Soter South alternative fails to meet the basic minimum requirements of the proposed project, PR has determined that Soter South would not survive Level 1 of the alternatives practicability analysis, if conducted today.

Since the submission of the Environmental Report, PR has been provided the details of the proposed line's alignment within the Camp Hall Commerce Park, including the preferred approach and location of the spur's connection to the Volvo site, as well as the location of the spur to the remaining portions of Camp Hall Commerce Park which to date is conceptual and undeveloped. Previously, PR's preferred alternative project alignment terminated at the boundary of the Camp Hall Commerce Park, as the internal rail schematic for the Volvo site and remaining portions of the Park were still in the planning and development stage. However, Volvo has since informed PR that the proposed rail/automotive facility interface and rail spur, is to occur on the northern side of the Volvo site. This location means that the proposed entry point of the Soter South alternative to the Camp Hall Commerce Park, which was shown on the east/southeast boundary, *see* Environmental Report at Appendix A (Figures 1-5), is on the opposite side of the Volvo site from the proposed interface and rail spur. Such a configuration would require the spur

approach to the plant interface to either transect or loop completely around the Volvo site in order to meet Volvo's desired location.

Looking at each option in turn, transection of the Volvo site is deemed patently inadequate and unavailable to PR given the late stages of development of the Volvo site and access issues caused by such a route. *See Id.* at 12 (listing one of the primary characteristics and criteria of the proposed project as being "sufficient rail *access* and capacity to serve both phases of the Volvo Cars site") (emphasis added). Additionally, in order to provide rail access to the remaining portions of the Camp Hall Commerce Park, the transection route would require a crossing, either at-grade or grade separated, of Centerline Road in order to provide an access spur north/northwest of the Volvo Site. For the same reasons that such a crossing was deemed alternatively inadequate, cost-prohibitive, and logistically infeasible in considering the Ridgeville Route, *see id.* at pp.17-18, the transection route of the Soter South alternative is not a viable alternative. Similarly, looping around Camp Hall Commerce Park, as shown in the enclosed KMZ file, would substantially increase the impacts of the Soter South route due to additional rights-of-way acquisition and anticipated additional community and environmental impacts.

The above additional factors, when combined with Soter South's impact on the environment (e.g., the highest impact on emergent wetlands and the second highest overall wetland impact of the route alternatives), as well as the route's impacts on existing and proposed development (e.g., the permitted Nexton development), socioeconomic resources (e.g., required displacements/relocations), traffic and noise/vibration, PR has determined that the Soter South alternative fails to meet the basic minimum requirements of the proposed project and therefore should not be considered as a viable alternative to the Cross Route.

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.

RESPONSE:

In response to the above question, PR submits that it is feasible to make the requested shift to the Moncks Corner alternative, and PR submits a GIS file showing the shift along with this response. However, PR further submits that making the requested shift causes an obvious route modification that further impacts Calmus Pond Road, Whitehouse Road, and Lebanon Road, located to the east of the proposed Caton Creek stream and wetland mitigation bank. These areas are developed with residential properties, and minimizing residential relocations along those roads would require excess additional track curves or shifting the alignment further east near the main run of Wassassamaw Swamp. In lieu of these additional substantial impacts, which PR considers to be unacceptable, PR is enclosing an alternative alignment shift that avoids the mitigation bank to the north, mirroring the Cross Tier 2 Option north and west.

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.

RESPONSE:

The above recitation of the process of developing the alternatives and routes described in the Environmental Report is accurate; however, PR provides the following additional background and explanation on that process, as requested. As an initial step, PR developed generalized routes for all six (6) of the alternatives described in the Environmental Report's Range of Alternatives section (§ 3.4.2), using basic avoidance and minimization measures and based on two connection points: entry/exit point at the boundary of the Camp Hall Commerce Park, and a connection point with the alternative existing rails lines in the vicinity of the Park. These generalized routes served as the foundation for PR's consideration of the practicability of each alternative as determined by the alternative's ability to fulfill the basic minimum requirements, characteristics, and criteria of the project, as developed by PR. For those alternatives that did not fulfill the basic minimum requirements of the project (i.e., the Ridgeville, Eutawville/Holly Hill Routes), PR undertook no additional study, evaluation, or creation of optimized routes along those generalized routes.

Level 2 of the alternatives analysis then applied a finer level screening to each of the generalized routes, first gathering available public information related to environmental, economic, and socioeconomic resources, including cultural resources, within a 2-mile wide study area for each alternative. PR defined each study area as the area in which the alignment could be shifted in order to try and minimize the impacts to the natural and community environment. Thereafter, in the course of its Level 2 analysis, PR and its consultants conducted a fine-level information gathering and screening process that involved on-site review and testing of the sixteen (16) resource categories, *see* Environmental Report at 21-46, of each of the four (4) alternatives within a 200-ft project corridor, with the resulting information and data detailed in Level 2 of the alternatives analysis. Upon the evaluation of the Level 2 information for each of the alternatives, the Cross route was identified as PR's preferred project corridor, because it projected the least amount of overall impacts, while still meeting the characteristics and criteria identified for the proposed project. Only after the Cross route was carried forward to Level 3, did PR develop optimized routes within the broader Cross alternative through the use of avoidance

and minimization measures designed to reduce the impacts of the project route on the resources identified and studied in Level 2. PR identified and analyzed a number of optimized routes for their impacts before finally selecting two variances of the route with four alternatives.

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.

RESPONSE:

Please see the response to Question #9, above, which partially answers the question posed by this question. Additionally, PR submits that the conclusions for the Level 2 analysis were determined based on the expected impacts to the identified resources within the 2-mile study area. Additional or optimized routes within the study areas for the Moncks Corner, Soter South, and Soter North alternatives were not developed based on PR's determination that the Cross route impacted the identified resources the least. As detailed in PR's response to the initial request for additional information, Level 2 of the alternatives analysis looked at each alternative's impact on sixteen (16) explicit areas, including:

- Land use;
- Air quality;
- Noise;
- Geology and soils;
- Surface waters;
- Floodplains;
- Water quality and water resources;
- Wetlands;
- Endangered, threatened, and other listed species;
- Historic and archaeological resources;
- Environmental justice;
- Potential relocations;
- Traffic and transportation;
- Recreation and land stewardship;
- Section 6(f) resources; and
- Hazardous materials

See Environmental Report at 21-46. In general terms, if PR's analysis showed that an alternative would impact one of the resources listed above, measures were taken to establish a route that would avoid and minimize that impact, to the maximum extent

possible, while recognizing that shifts designed to avoid or minimize an impact on one resource, might cause or increase the impact on a different resource.

11. Please provide the project area corridor and all wetlands verified in the April and August 2017 Preliminary Jurisdictional Determinations in GIS file format.

RESPONSE:

The requested information is enclosed and submitted with this response.

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.

RESPONSE:

The requested information is enclosed and submitted with this response.

With respect to the request for clarification of the ROW and project corridor, please see the response to Question #9, above, which partially answers the request posed by this question. In an attempt to further clarify the use of the varying widths for the project and study areas, PR submits the following distilled explanation:

- Once PR determined that four (4) of the six (6) identified generalized routes would meet the basic minimum requirements of the project, PR, in conjunction with its consultants, gathered existing and publicly available information related to the environmental, economic, and socioeconomic resources, including cultural resources, within a 2-mile study area for each of the four (4) generalized routes. The information gathered served as a starting reference point for PR's Level 2 analysis.
- As a part of its Level 2 analysis, PR and its consultants next conducted a fine-level information gathering and screening process that involved on-site review and testing of the sixteen (16) resource categories of each of the four (4) alternatives within a 200-ft project corridor. The results of that information gathering and testing is detailed in Level 2 of the alternatives analysis. The purpose of gathering resource information within a 200-ft project corridor was to account for the possibility that the route alignments might shift slightly during the final stages of planning and development.

- The 100-ft project ROW reflects the minimum¹ actual project area and boundary of properties that PR intends on purchasing and/or condemning for the project, and therefore reflects the project ROW requested in the petition for exemption.

Sincerely,



T. Ravenel
Director of Special Projects

CC: Diana Wood, STB
Elizabeth Williams, USACE
David Bauer, ICF

¹ The 100-ft project ROW reflects the outer boundary of the construction limits for the project; however, PR's actual property purchase or condemnation may be larger than 100-ft in certain locations along the project route, depending on negotiations with the existing landowners.