



SABINE & WATERS

ENVIRONMENTAL LAND MANAGEMENT CONSULTANTS

March 1, 2018

Mr. T Ravenel
Director of Special Projects
Palmetto Railways
540 East Bay Street
Charleston, SC 29403

**SUBJECT: Protected Species Assessment (Appendix D of the Environmental Report)
Camp Hall Railroad Project
Berkeley County, SC**

Dear Mr. Ravenel:

This letter responds to the request for additional information from the Surface Transportation Board (STB) and United States Army Corps of Engineers (USACE) pertaining to the Protected Species Assessment performed on the referenced project. These agencies requested:

- maps, and supporting GIS data, showing locations used to access the project area and conduct the evaluation;
- maps, and supporting GIS data, showing areas determined to contain suitable habitat for the species assessed;
- a map, and supporting GIS data, of the of an area adjacent to the corridor where suitable habitat was identified; and
- information pertaining to two nearby areas identified by natural resources agencies as having potentially suitable habitat.

Each of these topics are addressed below and indicated on the attached maps.

Enclosed are maps and shapefiles depicting the potentially suitable habitat identified as well as access to the different areas of the corridor. The entirety of the corridor was further assessed in the field for potential suitable habitat for all listed species during the wetland delineation process. The length and width of the corridor was traversed with transect spacing depending on habitat suitability, ground conditions and basal area of the forest. If habitat was considered unsuitable for an area, additional assessment was not completed. The corridor was re-visited many times

during subsequent site visits with USACE personnel, during which no threatened or endangered species were encountered.

Access to the corridor was granted from the property owners that the corridor crosses. Most access points were gated and locked, with access granted from Weyerhaeuser and a key provided. Some gated areas we had vehicular access (shown in red on attached map) and other areas we were required to walk in (shown in yellow on attached map). Access routes show gates, roads, and trails that were used to navigate around the corridor and large wetlands; however, the entirety of the corridor was traversed. Where potential suitable habitat was documented, the area was surveyed for listed species. We did not have legal access to some properties abutting and outside of the corridor in order to assess the habitat and survey for any listed species. Any adjacent properties without access were assessed from public right of ways and from properties we had permission to access. Further research was completed based on aerial imagery and coordination with SCDNR on species occurrences.

In the area identified as potentially suitable RCW foraging habitat adjacent to the corridor, Sabine & Waters obtained landowner permission to conduct a survey on August 2, 2017 to determine presence of RCWs in the area. No vocalizations, RCWs, natural starts, cavities, or any evidence of RCWs were observed. Per the United States Fish & Wildlife Service's (USFWS) RCW Recovery Plan, we confirmed there is not enough potentially suitable habitat on the adjacent property to support nesting habitat, but it does qualify as foraging habitat. This property is primarily loblolly pine and was thinned to its current state in 2013. The rail corridor is approximately 130-140 linear feet away from the property boundary that has the potentially suitable habitat. This area of potentially suitable habitat is surrounded by unsuitable habitat including fields, houses, wetlands, industrial timberlands, and roads.

USFWS and South Carolina Department of Natural Resources (SCDNR) further identified two areas near the Cross Generating Station as potentially suitable RCW habitat. Area 1 is not within the project area of the corridor we assessed and delineated; therefore, this area was not evaluated. An evaluation of Area 1 can be completed upon request.

Area 2 was surveyed and does not meet the suitable habitat guidelines outlined in the USFWS's RCW Recovery Plan. This area is loblolly pine approximately 20 - 40 years old, with a density above 70 basal area. An established understory of sweet gum, loblolly, red maple and hickory would also deter RCW's from using the area. There is evidence of a past prescribed fire on the landscape although it has been many years since this stand has seen fire. Because the habitat is considered unsuitable per the RCW recovery plan, a detailed survey was not completed in this area.

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Based upon our habitat assessment, there are few areas along the corridor that could be considered potentially suitable habitat for any listed species due to the land use (i.e. industrial forestry) and the practices that are commonplace with forest management of these areas. Mechanical and herbicide site preparation treatments, short rotation harvests and lack of fire on the landscape do not provide the ecosystems necessary that would harbor listed species. Areas outside of the project impact area could only be assessed from the corridor where access was allowed and with the use of remote sensing technology.

Please contact me with any additional questions.

Respectfully,

Robert Strange
Sabine & Waters, Inc.

Copy: Tom Hutton GEL

Enclosure