



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

#EO-2985

Office of Environmental Analysis

September 28, 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 #1

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. Please provide further explanation of the term "logistically feasible" as it is used and applied in the Environmental Report provided by Palmetto Railways, including explanation of why the use of multiple Class I freight carriers to access the Port of Charleston would be "logistically impractical and functionally infeasible." (p.19)
2. Please provide documentation that Palmetto Railways would not be able to have operational control of a new rail line that would connect the Camp Hall Commerce Park to the Norfolk Southern freight line running through Dorchester County.
3. Please provide further explanation of the statement in the Environmental Report (p. 18) which, implies that connection to the Norfolk Southern mainline would require expansion of the capacity of that line. Please include clarification of the "logistic and feasibility risks."
4. Based on the route information provided in GIS format along with the Environmental Report, it appears that portions of some routes would be located within power line rights-of-way. Has Palmetto Railways discussed the feasibility of sharing these ROWs with the owners/operators, and if so, what were the results of those discussions?
5. It appears from the Environmental Report that different criteria were used for comparing potential alternative routes at the Tier 1, 2 and 3 levels. Please clarify the criteria that were used at each level and the associated rationale for use of those criteria.

Thank you for your assistance in this matter. Please feel free to contact me or 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 October 30, 2017.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victoria Rutson".

Victoria Rutson
Director, Office of Environmental Analysis

cc: Courtney Stevens, USACE