



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

#E1-26408

February 8, 2019

F/SER47:CC/pw

Ms. Diana Wood
Surface Transportation Board
Docket No. FD 36095, c/o ICF
9300 Lee Highway
Fairfax, VA 22031

Dear Ms. Wood:

NOAA's National Marine Fisheries Service (NMFS) reviewed the *Draft Environmental Assessment STB Docket No. FD 36095 Camp Hall Rail Line* (Draft EA) for work in Berkeley County, South Carolina, issued on November 30, 2018. The Draft EA focuses on potential impacts of the proposed Palmetto Railways industrial rail line connecting an existing CSX rail line near the Santee Cooper Cross Generating Stations to the Camp Hall Commerce Park. The proposed project involves impacts to 120 acres of freshwater wetlands and a new bridge crossing over the Diversion Canal between Lakes Marion and Moultrie. By letter dated May 4, 2018, NMFS recommended:

1. The staging area should be limited to 0.5 acres of anadromous fish habitat and all areas should be restored to pre-construction conditions following construction.
2. In-water work should be avoided between February 16 and June 15, to the maximum extent practicable, to avoid periods of anadromous fish migration and spawning.

Draft EA Section 3.5.2.1 states, in response to NMFS comments, "the Applicant responded by identifying best management practices that would be implemented, as required, during construction, including avoiding in-water work between January and June to the maximum extent practicable." However, neither the seasonal windows nor limited staging area are included within Section 4 Proposed Mitigation. The NMFS continues to stress the importance of seasonal windows and limiting the staging area within anadromous fish habitat, and recommends these be explicitly included as mitigation measures in Section 4.7 Fish and Other Aquatic Species.

The NMFS greatly appreciates the opportunity to provide these comments. Please direct related correspondence to the attention of Cindy Cooksey at our Charleston Area Office. She may be reached at (843) 460-9922 or by e-mail at Cynthia.Cooksey@noaa.gov.

Sincerely,

Pave Weller

/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: STB, CampHallRailLineNEPA@icf.com
COE, Elizabeth.G.Williams@usace.army.mil
SCDNR, MixonG@dnr.sc.gov
F/SER47, Cynthia.Cooksey@noaa.gov

