

#EL-26401

1990 Liberty Road
Charlotte, TN 37036
December 29, 2018

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

Dear Ms. Wood:

After review of the Draft Environmental Assessment: Camp Hall Rail Line (STB Docket No. FD 36095) dated November 30, 2018, I have the following comments:

1. In "Purpose and Need and Proposed Action" on Page S-1, it is stated that "The Applicant intends for the proposed rail line to bring industrial rail service to the Volvo Cars of North America (Volvo Cars) facility and others in the Camp Hall Commerce Park, thus enhancing distribution and logistics for current and future tenants." Will Volvo Cars or businesses associated with Volvo Cars use the proposed rail line to transport the equipment, parts, and supplies needed to assemble Volvo vehicles into the Volvo facility via the proposed rail line and how will these needs affect traffic on the proposed rail line (type of rail cars, length of trains, number of passbys, etc.)? Since the rail line is expected to be used by other tenants in addition to Volvo Cars, the operational impact of the rail line should be evaluated based on its expected usage after full development of the Camp Hall Commerce Park. In "Introduction" on Page 1-1, it is stated that Volvo Cars will occupy 2,880 acres of the 6,781 acre commerce park while another 1,387 acres has been permitted for industrial development by Santee Cooper. What kind of industry does Santee Cooper plan for its acreage and what type of development is expected for the remaining 2,514 acres in the commerce park? How much rail traffic is this additional development expected to produce? What affect would any additional rail traffic needed to transport equipment, parts, and supplies for Volvo or to meet the needs of other future tenants of the commerce park have on noise, accident risk rate, vehicle delay, and other factors evaluated in this environmental assessment during operation of the proposed rail line? This Environmental Assessment is incomplete without this information and needs to be completed before it is decided whether to approve the application under consideration.
2. On page S-3 under "Preferred Alternative", it is stated that "the Applicant anticipates transporting approximately 50,000 automobiles per year on five round trips (10 transits or passbys) on the propose rail line per week, for an average of 1.4 train passbys per day." This does not include usage by other future tenants of the Camp Hall Commerce Park. The Applicant should be required to provide a projected number of train passbys per day after full development and a projected timeline for future development of the Camp Hall Commerce Park.
3. In "Summary of Impacts" on Page S-6, for the Noise and Vibration resource it is stated that "Construction noise would exceed the FTA threshold at one sensitive receptor (91 dBA: threshold is 90 dBA). The same receptor could be affected by wayside noise (horn) during operations." The proposed mitigation is "VMs will require use of noise-dampening rail

materials; support community-initiated establishment of Quiet Zones.” This is repeated on Page S-8 under Cumulative Impacts. I can see how the proposed mitigation actions will address noise during operation but I do not see how they would address noise during construction. Please have the Applicant explain how noise-dampening rail materials and Quiet Zones would address construction noise or, if they do not, the Applicant should be required to provide a mitigation plan that addresses construction noise in the area where the FTA threshold is exceeded.

4. In Norfolk Southern’s letter (dated February 26, 2018) in Appendix A, Norfolk Southern refutes the main reasons given by Palmetto Railways for eliminating the Ridgeville Route which would connect to their existing rail line at Ridgeville, South Carolina, and emphasizes the many efforts they made to facilitate consideration of this alternative. I noted two reasons given for eliminating the Ridgeville Route were quite contradictory with conclusions made for the Cross Route: 1) the Applicant objected to the impact of an at-grade crossing within the Commerce Park with the Ridgeville Route yet belittled the impact of at-grade crossings of two state highways and numerous county roads outside the Commerce Park with the Cross Route; and 2) the Applicant objected to the cost of constructing a bridge across Interstate 26 with the Ridgeville Route yet belittled the cost of constructing a bridge across the Diversion Canal with the Cross Route. In view of the greatly reduced length of new rail line required, the commensurate reduction in adverse impacts, and the potential for a much greater number of passbys to be expected with full development of the Camp Hall Commerce Park, use of this route should be re-evaluated.
5. In Palmetto Railway’s responses in Appendix A to the U.S. Surface Transportation Board’s letter of November 29, 2017, the former responded to the latter’s request for “an estimate of potential additional rail traffic associated with Phase II and with other anticipated development of the Commerce Park” by stating that “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.” While it is agreed a calculation of additional volume from future tenants is speculative at this time, such an estimate need not be created in a vacuum. The development of any commerce park is predicated on an analysis of potential tenants with much thought given to developing the facility so as to meet their needs, including transportation of parts and materials needed during operation and products produced. In addition, there is much information available from other commerce parks, and particularly commerce parks with an auto manufacturer as an anchor tenant, that can be used to make projections on potential rail transportation needs. This evaluation can obviously begin with considering tenants that would be associated with Volvo Cars. Thus, the Applicant’s substitution of an unsubstantiated assumption (that future needs can be satisfied simply by lengthening the “five weekly” trains required by Volvo Cars) for a detailed analysis of the rail transportation needs of future tenants should not be acceptable. The Applicant should be required to provide a fact-based estimate of the rail transportation needs of potential future tenants of the Camp Hall Commerce Park, including the expected volume and frequency of passbys required, and this estimate should be applied to the Environmental Assessment or, if needed, an Environmental Impact Statement.

Assistance from Santee Cooper and Camp Hall Commerce Park staff will be needed to produce this information but this input is essential to evaluating the full impact of the Applicant's proposed rail line. And even if it is determined that the Applicant's assumption that future needs can be satisfied by lengthening the passbys required by Volvo Cars, the impact of these longer trains should be considered in evaluating the proposed project's impacts.

6. In Palmetto Railway's responses in Appendix A to the U.S. Surface Transportation Board's letter of November 29, 2017, the former responded to the latter's request for information on "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" by stating (based on information provided by Santee Cooper) "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.)." Since, based on this information, the currently estimated five round trip trains per week required by Volvo Cars will nearly double the level of traffic on the existing spur line, an evaluation of the impact of this change should be required. This evaluation should include information such as the length and alignment of the existing spur line, the number of at-grade crossings along this line, and the effect of the increased rail traffic on wildlife, residents, and vehicular travel through the area. Note that the consideration of additional rail transportation required by future tenants of the Camp Hall Commerce Park would bolster the need to require evaluation of the impact of increased rail traffic on the existing spur line.

Thank you for the opportunity to comment on this proposed n. I consider my comments #1, #2, and #5 to be CRITICAL comments as FULL development of the Camp Hall Commerce Park has the potential to create MUCH more rail traffic than used to prepare this Environmental Assessment and has a significant potential to trigger the need for additional mitigation and/or a full Environmental Impact Statement.

Sincerely,
Phyllis Kohl 