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South Carolina Department of Natural Resources

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Alvin A. Taylor
Director
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Director, Office of
Environmental Programs

September 28, 2017

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

Ms. Courtney Stevens
U. S. Army Corps of Engineers
69-A Hagood Avenue
Charleston, SC 29403-5107

Re: STB Finance Docket No. 36095, Palmetto Railways – Construction and Operation
Exemption, Berkeley County, SC; Preliminary Consultation

Dear Ms. Wood and Ms. Stevens:

As you know, Palmetto Railways has filed a petition for exemption with the Surface Transportation Board (Board) pursuant to 49 U.S.C. §§ 10502 and 10901 in Docket No. FD 36095 for authority to construct and operate a new rail line in Berkeley County, South Carolina. The proposed rail line would provide rail service from the existing 6,781-acre Camp Hall Commerce Park to the A-Line of CSX Transportation Inc. (CSXT) near the Santee Cooper Generating Station. The stated purpose of the project is to bring rail service to the industrial park, to support area infrastructure needs, and to alleviate highway congestion involving large commercial trucks.

We understand that The Board's Office of Environmental Analysis (OEA) together with the United States Army Corps of Engineers (Corps), as joint lead agencies, are evaluating the potential environmental effects of the proposed project and are soliciting input from the resource and regulatory agencies regarding potential impacts to resources of concern to our agency.

As an agency mandated to protect and conserve the natural resources of this state, we have a strong interest in the construction of the proposed rail line. According to the Environmental Report dated July 25, 2017 prepared for this project, approximately 83.18 acres of jurisdictional wetlands will be impacted by project construction. Wetland

areas provide valuable habitat for fish and wildlife and are essential in maintaining water quality in adjoining water bodies. Careful consideration should be given to avoiding wetland impacts whenever possible and minimizing unavoidable impacts to the maximum extent possible. Means for avoiding and minimizing wetland impacts should be incorporated early on in the planning and design stages and should include such things as bridging and culverting wetland crossings, reduced right-of-way widths, and the use of minimal disturbance construction methods. The project corridor also crosses open water at the Diversion Canal between the Santee-Cooper lakes. In an effort to minimize impacts to diadromous fish (American shad, blueback herring, and hickory shad) spawning runs, construction should be excluded between January and April.

As a part of the permitting of the Camp Hall Commerce Park (P/N 2015-01764), a significant area of wetlands on-site was set aside as mitigation for project impacts. There is a large area of wetlands designated as preservation located in the northeast corner of the Park where the rail line comes onto the property. Every effort should be made to avoid existing on-site mitigation areas in the planning and final design of this project.

The Protected Species Assessment dated July 25, 2017 included in the Environmental Report submitted for this project outlines the survey protocol used in identifying potential habitat that could support threatened or endangered species along the project corridor, including the Red-cockaded woodpecker (RCW). Due to access constraints, only the project corridor (200' wide area) was assessed for RCW's. The minimum distance heavy machinery can come within active RCW cavity trees during RCW breeding season is 200', necessitating the need for a survey boundary of 200' on either side of the project corridor. Site visits conducted by SCDNR staff identified some areas of potential suitable habitat that will require further review within the current 200' corridor (see attached maps). For questions regarding these survey recommendations, please contact Ms. Caroline Causey (SCDNR RCW Project Leader) at 803-603-9391 or CauseyC@dnr.sc.gov.

South Carolina State Wildlife Action Plan (SWAP) species have been documented near the project corridor. SWAP species are those species of greatest conservation need not traditionally covered under any federal funded programs. Species are listed in the SWAP because they are rare or designated as at-risk due to knowledge deficiencies; species common in South Carolina, but listed rare or declining elsewhere; or species that serve as indicators of detrimental environmental conditions. SCDNR recommends that appropriate measures should always be taken to minimize or avoid impacts to these species of concern. Occurrences of Cedar Creek Crayfish (<http://www.dnr.sc.gov/swap/supplemental/crayfish/cedarcreekrayfish2015.pdf>) and Black Mottled Crayfish (<http://www.dnr.sc.gov/swap/supplemental/crayfish/blackmottledcrayfish2015.pdf>) have been documented approximately 2 miles to the west of the Diversion Canal crossing. Other possible crayfish in this area include the Santee Crayfish (<http://www.dnr.sc.gov/swap/supplemental/crayfish/santeecrayfish2015.pdf>).

Under Section 6.1.1.1 (Recreation and Land Stewardship) of the Environmental Report for this project, protected and conserved lands in the project corridor are described. In

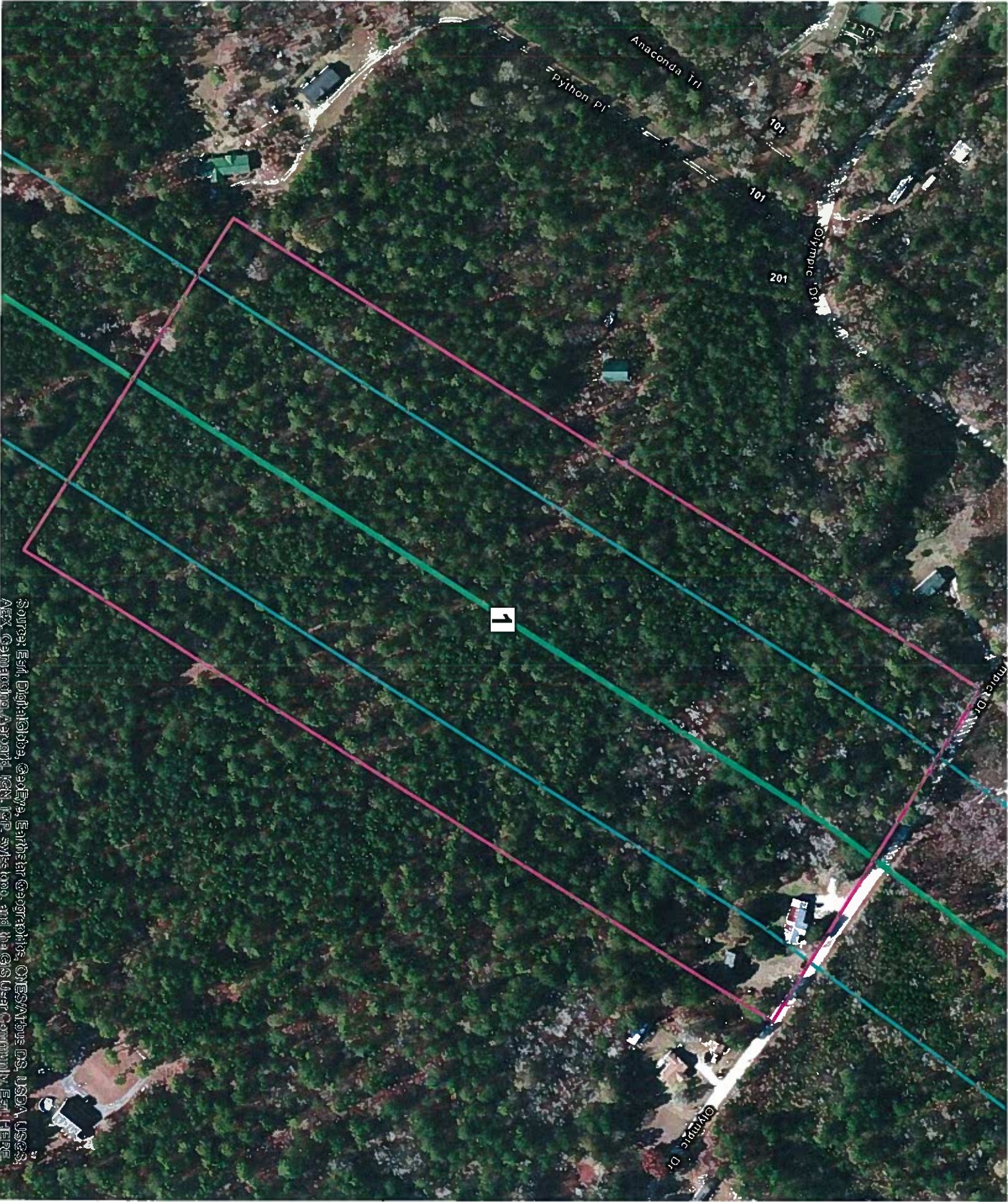
reviewing our protected lands database, we identified a conservation property located immediately east of the project corridor (see attached map). This property consists of 85.25 acres of land held under a conservation easement by the Lord Berkeley Land Trust. Every effort should be made to avoid encroachment into this area in the planning and final design of this project.

We appreciate the opportunity to provide input in the early stages of this project and will be available for future input. If you have any questions regarding these comments, please contact me at daviss@dnr.sc.gov or 843.953.9003.

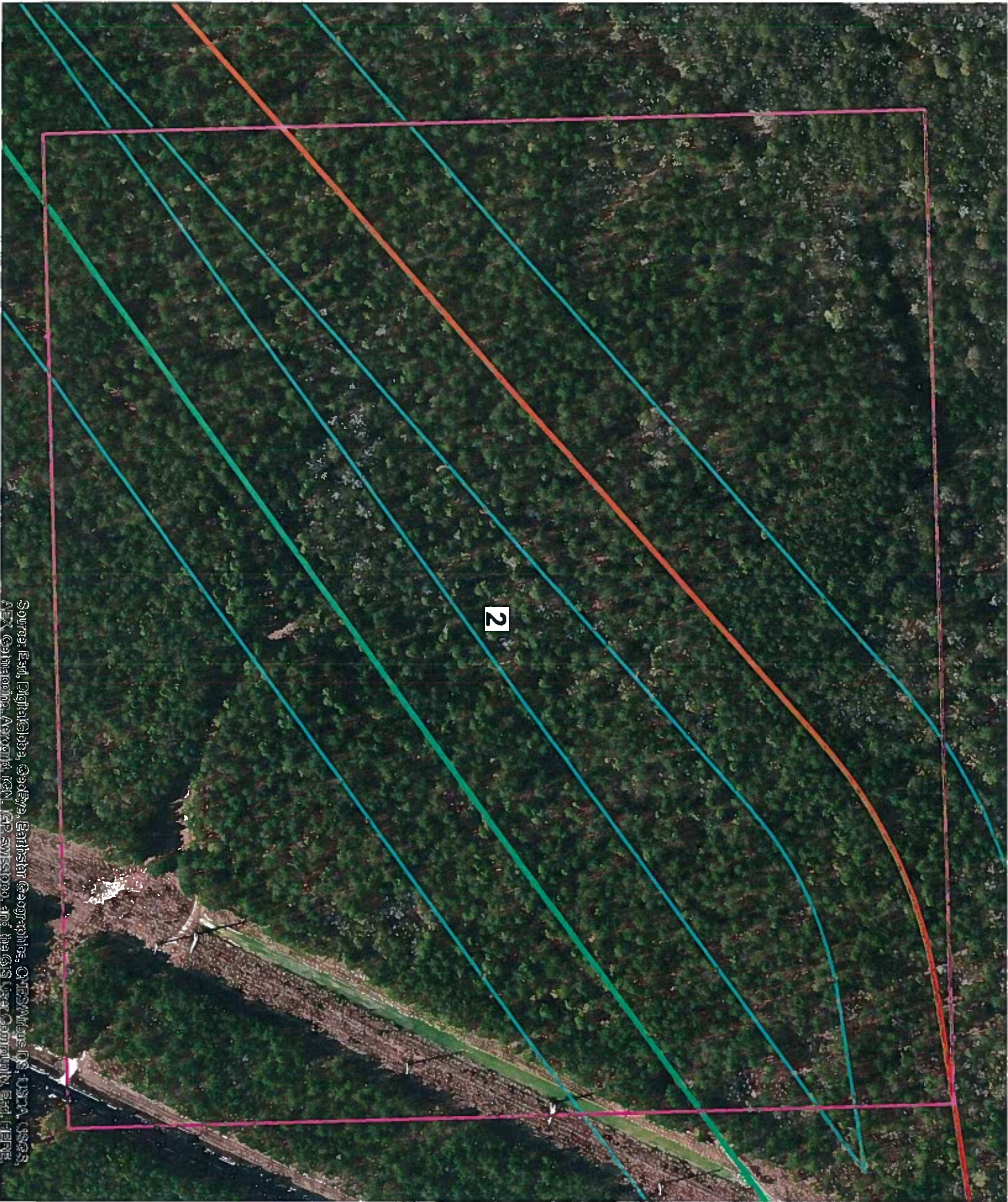
Sincerely,

Susan F. Davis

Susan F. Davis
Coastal Environmental Coordinator



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, GeoEye, AeroMap, IGN, IGP, Swisstopo, and the GIS User Community



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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, IGP, Swisstopo, and the GIS User Community. See HERE

