

E1-25760

January 24, 2017

Victoria Rutson, Esq.
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

**Re: Docket number - FD 36095;
Camp Hall Commerce Park Rail Connection;
Request for Waiver of Six-Month Pre-filing Notice**

Dear Ms. Rutson,

Pursuant to 49 C.F.R. § 1105.10(c)(2), I am writing on behalf of Palmetto Railways to request that the Surface Transportation Board (the Board) waive the six-month pre-filing notice requirement of 49 C.F.R. § 1105.10(a) for Palmetto Railways in STB Docket FD 36095. Palmetto Railways intends to petition the Board for an exemption under 49 U.S.C.A. § 10901 to permit it to construct and operate approximately 23 miles of new railroad trackage (the Line). Palmetto Railways submits that a waiver of the 6 months' advance notice requirement is consistent with the regulations of the Office of Environmental Analysis (OEA) and the Board's policies.

For your information, Palmetto Railways is a division of the South Carolina Department of Commerce, a public agency and political subdivision of the State of South Carolina. Palmetto Railways intends to construct and operate an industrial rail line to connect the Camp Hall Commerce Park to the existing CSX Transportation, Inc. (CSXT) A-Line in Berkeley County, South Carolina. The Camp Hall Commerce Park comprises approximately 6,781 acres, of which 2,880 acres have been permitted by Berkeley County for development of Volvo Cars' first North American factory, which is expected to begin production by the end of 2018. An additional 1,387 acres of the Camp Hall Commerce Park is being permitted for industrial development by Santee Cooper. The Line is intended to bring industrial rail service to the entire Camp Hall Commerce Park. Industrial rail service is an additional transportation mode that enhances options for distribution and logistics for the industrial development and the customers that locate at the Camp Hall Commerce Park. In addition, the proposed industrial rail service will support the State of South Carolina and Berkeley County's infrastructure needs and will help alleviate highway congestion involving large commercial trucks.

The proposed Line will run approximately 20-30 miles through Berkeley County, depending on what route is ultimately selected as the proposed alternative. Regardless of the specific route, the nature of the general area (and a study area has been identified) means the Line will pass through a mix of commercial, residential, and silvicultural properties and the Line's assumed right-of-way will mostly be covered by forests, forested wetlands, and open water.

Because the majority of the alignment is in active silviculture areas, it will have minimal hazardous effects on potential environmental justice communities.

Regarding environmental impacts, movement of the Commerce Park traffic by rail instead of truck will be beneficial due to the reduced highway congestion and associated air and noise pollution and energy consumption. The Line is expected to potentially impact jurisdictional waters of the United States, including streams and wetlands. As such, the United States Army Corps of Engineers (USACE) is currently conducting an environmental review of the proposed project under Section 404 of the Clean Water Act (CWA) and the National Environmental Policy Act, 42 U.S.C.A. §§ 4321 *et seq.* (NEPA). Unavoidable wetland impacts along the project corridor will generally include fill and clearing impacts to wetlands and culvert, piping, and shade impacts to streams and jurisdictional ditches.

Please let me know if you have any questions. We greatly appreciate your assistance and look forward to working with you on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff McWhorter".

Jeff McWhorter
President and CEO