

Palmetto Railways Response to
National Marine Fisheries Service Questions

May 25, 2018

1. The project states that 8 new 8.5 ft piles will be installed and that the in-water work will cover a total area of 453.6 ft². Can you please clarify if there are other in-water structures since 8 piles x 8.5 ft in size (102 inches) = 68 ft²

The six-span bridge would be supported by seven new bents. In-water structures include four bents. Each of the four bents consists of two 8 foot 6 inch-diameter drilled shaft foundations that would be constructed in water. A total of eight drilled shaft foundations would be placed in water for a total of 453.6 square feet of in-water structures.

2. How will the metal casings be installed to cast in place the concrete piles? We are trying to ensure that no metal is installed by impact hammer so as to prevent injurious noise effects.

As described in Palmetto Railways' Community Mitigation Commitments letter, the following conditions will be placed on Pile Driving/Caissons/Drilled Shaft Foundations:

- a. The contractor will use drilled shaft foundations instead of piles, where feasible.
 - b. The contractor will be required to implement measures to control and/or contain suspended sediments resulting from construction activities.
 - c. Siltation barriers, if required, will be made of material in which a Protected Species cannot become entangled, will be properly secured, and will be regularly monitored to avoid entrapment of protected species.
 - d. The contractor will use a vibratory hammer to the maximum extent practicable.
 - e. The contractor will use cushion blocks or other noise attenuation devices when using an impact hammer.
 - f. Pile driving activities will be limited to no more than 12 hours per day
 - g. Contractor will use a "soft start" for a pile driving activities (i.e. - driving does not occur at full power at first).
3. If you cannot give a construction schedule at this time, can you at least provide an estimated time or worst case scenario for how long it will take to complete the in-water work (days, weeks, months) and if work will be limited to daytime construction?

The project is being constructed through a design build delivery method and the construction schedule is not yet determined. Once construction is initiated, however, the Contractor will be required to complete the project in an expeditious manner in order to minimize the period of disturbance to environmental resources. All in-water work will be limited to daylight hours.

4. Are you willing to cease operations in the unlikely chance that a sturgeon is spotted? if so, would you agree to follow the Sea Turtle and Sawfish Construction Conditions and apply them to sturgeon?

[http://sero.nmfs.noaa.gov/protected_resources/section 7/guidance_docs/documents/sea_turtle_and_smalltooth_sawfish_construction_conditions_3-23-06.pdf](http://sero.nmfs.noaa.gov/protected_resources/section_7/guidance_docs/documents/sea_turtle_and_smalltooth_sawfish_construction_conditions_3-23-06.pdf)

Palmetto Railways will agree to apply these conditions to sturgeon.

5. Item 2 of the checklist states that water quality effects will be minimized or avoided. Does this include turbidity curtains or do you not feel they are necessary at this location and can you explain why?
- o Construction could also temporarily affect water quality, causing an increase in turbidity levels and reduction of dissolved oxygen levels in the water column. Construction materials (including concrete) and accidental petro-chemical spills could also enter the water column which could temporarily degrade water quality conditions. It is anticipated that these potential temporary water quality impacts would be avoided or minimized through best management practices proposed by Palmetto Railways.

General BMPs: The following BMPs will be implemented during construction by the contractor responsible for the execution of the work. These will be required in addition to conditions set forth in regulatory permit(s).

- a. Prior to construction, the Contractor shall be required to submit a Work Plan describing its proposed construction approach, methodology, and equipment to be used. This plan will be reviewed by the Owner and/or their representative(s) to ensure compliance with applicable regulatory conditions and BMPs. The contractor shall also be required to attend and document his/her attendance at the Pre-Construction Conference meeting.
- b. Once construction is initiated, the Contractor shall be required to complete the project in an expeditious manner in order to minimize the period of disturbance to environmental resources.
- c. Land disturbing activities shall not encroach into any wetland areas outside of the permitted impact area.
- d. The Contractor will be required to implement BMPs that will minimize erosion and migration of sediments on and off the upland project site, including reclaimed lands, during and after construction. The contractor will also be required to conduct inspections at a minimum of at least once every calendar week or within 24 hours of the end of a storm event of 0.5 inches or greater, until final stabilization is reached on all areas of the construction site.
- e. The contractor will be required to ensure that oil, tar, trash, debris, and other pollutants do not enter the adjacent waters or wetlands during construction.
- f. All construction personnel will be instructed on the potential presence of protected species in the construction area as described in the Protected Species Assessment and the need to prevent entrapment, harm, or other impacts to these animals.
- g. All construction personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing protected species.
- h. All in-water construction activities will be performed during daylight hours.