

Mr. McCrory — for your information # E1-26399
Tom Tethers

Ms. Diana Wood,

STB- Environmental Filing Docket No. FD 36095

C/O ICF

9300 Lee Highway

Fairfax, Virginia, 22031

Dear Ms. Wood,

I was really taken aback by the STB Campbell Hall project report about Palmetto Railways proposed project to link Cross Generating Station to the Volvo Plant.

You consistently referred to the St. Stephen to Cross existing railroad as a CSX spur line. Years ago this was a logging line of Camp Lumber operating as Carolina Western. After the company left the area, Santee-Cooper bought the rail line and modified its route west of Russellville to reach their new generating plant at "Cross".

There are several "Cross" locations. One being a cross-road on the Moncks Corner to Eutawville highway, another being the Cross church and Mercantile stores, and of course, the Santee Cooper location on the east bank of the diversion canal.

I traveled over the Lake Marion Dam to Cross 20 years ago with a trustee of Santee Cooper and visited the Power plant. The fuel coal is pulverized and then the dust is blown into a great combustion chamber that stands 12 or more stories high. I was allowed to ride the elevator up to the top of the tower and stepped out onto an open grid floor to stare down the length of the tower to the ground below. The entire structure was vibrating as the coal burned rapidly creating steam to drive the generators. It was a pivotal moment.

Santee-Cooper operated their rail line as Carolina Western which name had been used by Camp Lumber. They purchased two used diesels and pulled unit trains of coal from St Stephen to Cross and returned the empty cars to the Atlantic Coast Line at St. Stephen to run back to Virginia coal fields.

Santee-Cooper found that the diesels, being well used, were subject to heavy repair and they were unable to provide this service. They then sold the Santee Cooper diesels and made a compromise with the ACL, later SCL, then CSX to provide a Santee-Cooper crew at St Stephen to take the trains to Cross, and return the empties.

Later they contracted with the new East Cooper & Berkeley Railroad of Wando to drive to St Stephen to move the trains. Today, the EC&B continues to be an integral part of the **Palmetto Railways**.

CSX brings a loaded coal train of CWX cars (Santee-Cooper) to St. Stephen where an East Cooper & Berkeley crew (now Palmetto Railways) moves the cars to Cross using the CSX power. The CSX power is then put on a train of empty CWX cars and returns them to St.

Stephen. So, while it may SEEM that CSX owns and operates the Santee-Cooper Carolina Western Track, it does NOT (unless a new agreement has recently changed things.

The Filing Docket has considerable redundancy in that facts are stated and restated ad inifinitum, to fit the constraints of the official format. It is Far from satisfactory to present such a departure from a valid and concise report.

THESE following items stood OUT as UNSATISFACTORY and POORLY PRESENTED:

Bulltown Ditch is described over and over as being a possible problem that would require three culverts for the track to cross. YET there was NO MAP of Bulltown Ditch until the end of the entire thesis when I found one map with the ditch indicated with tiny gray letters parallel to the ditch making it a prize to discover. Considering that several maps centered on Cross, it would have been easy to identify the ditch on them. SUCH AN OMISSION IS UNFORGIVABLE.

Despite all the possibilities discussed for conditions that might occur during construction, I found NO CONSIDERATION for any derailment or worse, a wreck of a train when the railroad was in daily operation. AGAIN, A MAJOR FLAW IN THE PRESENTATION.

Under consideration should be:

An auto or truck collision with the locomotives or the freight cars.

The derailment of one or two locomotives while in transit.

The derailment of a single freight car or many while in transit.

The possible injury or death of a pedestrian along the track by one of the trains.

In the section on the waters of Four Holes Swamp, there really should be a mention that while the water flows into the Edisto River, some of the waters of the Edisto are taken directly by tunnel to the waterworks in North Charleston. This plant supplies water to North Charleston, Charleston and parts of the city west of the Ashley. Thus an environmental problem in the Four Holes Swamp area can directly affect an entire city in a dramatic way. A LAPSE OF JUDGEMENT OF SIGNIFICANCE.

There was no recognition of the effect that additional industries at Campbell Hall would, or could, effect the number of trains needed. One sentence mentions a few extra cars could be added to the train. I think in the long haul, that success could lead to many more trains.

Finally, under historic influence on the property being considered, interviewing Cherokee people who are centered in western North Carolina about any cultural ties to the Low Country was **ludicrous. I recommend asking the elders of the local Wassamassaw Tribe centered near Long Ridge and Sand Ridge what ties they may have.**

You list only two historic sites in the overall area of note: The Garrett Cemetery and the original Santee Canal. Neither was going to be affected by the construction or the operation of trains.

Sadly, you overlooked a great deal of significant development that co-exists, although perhaps not clearly evident on the surface, it may prove of interest during construction. Seeing that **ALL CONSTRUCTION WILL STOP IMMEDIATELY if such artifacts are discovered, you should make an effort to document the existence BEFORE any surprised discovery.**

I suggest looking into the property of E. P. Burton Lumber Co.; J. F. Prettyman & Sons; and A. W. Taylor Land & Lumber Company.

The town of Chicora, SC in Berkeley County was highly active with several logging railroads spreading out in many directions. The Berkeley Railroad (built as the New England City Railroad) from Moncks Corner to Pineopolis and out to Chicora had an extension to "Cross" that had the church and two local stores. THIS CROSSES THE PROJECTED PALMETTO RAILWAYS LINE.

You failed to mention the historic villages of **Long Ridge** on State Road just east of Wassamassaw Swamp, as well as the community of **Deer Park** just west of Wassamassaw Swamp at Columbus Road. The railroad itself ran from **Summerville to Long Ridge to Deer Park and west to Mill Pond Road** with a number of logging spurs. These rail lines intersect the proposed Palmetto Rails project line. **THIS WOULD BE AN HISTORIC FEATURE OVERLOOKED BY YOUR REPORT.**

North of Summerville, a logging line ran west to Cypress Swamp and ran north nearly to State Road. THIS LINE ALSO ESCAPED NOTICE IN YOUR REPORT.

Using your maps, I place the Campbell Hall location as east of Dorchester County and north of I-26. It is in Berkeley County, west of Cypress Swamp. However, I found it difficult to directly place this on South Carolina Topological maps of circa 1919, as many of the major roads of that period did not get identified or drawn in on the simplified maps used in the report.

On page S-3, you report anticipation of 5 round trips per week. And that is equal to 1.4 trains per day. YOUR MATH IS MAGICAL unless a week is only 5 DAYS in your book. I doubt that Volvo is under this assumption. Even 5 times 1.4 is far greater than 5 round trips calculated by magic.

Under paragraph 2211, Level 1 you mention a direct connection to a Class 1 rail Freight main line. The Santee-Cooper freight line does not conform to Class 1 Rail Freight Main Line status.

The CSXT Line A at St. Stephen does meet the category, but the Campbell Hall Palmetto Rails line does NOT connect with the CSXT line "directly". Looks like a bit of fudging going on here.

"Cross High School" is outside the sound barrier limit, but close enough to be an attractive nuisance. It will seem to provide an excellent alternative to following the local roads of the area and with only a trip a day, will seem fully safe once a train has passed. I suggest some consideration be made to discourage the use of the right of way as a path home.

One of the presented maps shows "Cross" as south of Nelson Hall (at the intersection of Route 6 and the Palmetto Rails crossing. This appears to be the site of the CROSS with the church and mercantile stores. While track WAS built from Chicora up to THIS Cross, it is now under the waters of Lake Moultrie. Nevertheless, Track was built north and west from THIS CROSS that ran to Ferguson on the Santee River which was a Santee River Cypress Lumber Company line. THIS RAILROAD IS IN DIRECT INTERSECTION WITH THE PALMETTO RAILS PROJECTED LINE. AGAIN, NOT RECOGNIZED AS A HISTORIC LOCATION.

Page 3-20. The stated proposed rail yard at Campbell Hall is shown as two or three parallel lines joined at the northeast end. Considering that Santee-Cooper resorted to a large circular feature to turn the trains as they were emptied and before sending them back to St. Stephen, it is worth considering that this feature may be more advantageous for the Palmetto Rails proposed line.

Section 3.8.2.1 Archaeological Resources states **“No archaeological Site or isolates were identified.”** I have IDENTIFIED SEVERAL FOR CONSIDERATION. Even the village of CHICORA now submerged under Lake Marion had five or more rail lines radiating in all directions. Some investigation of the various lumber mills should disclose the exact position of these forgotten archaeological sites.

MAP 3-9-3 Coastal Zone

This map bears a most interesting rail development east of the CSXT A Line and just north of the Santee River. The map shows it as north of Alvin, SC with a large rail yard identified as PVTX.

I, for one would like an explanation of this alphabet soup location. The use of code on a map designated as EXPLANATORY, fails if the Code is not de-ciphered. NOT READER FRIENDLY

Chicora was originally well to the east of Millpond Road which crossed Route 311 at **CROSS SCHOOL** (Crossroad).

North of **CROSS SCHOOL** on Millpond Road was **CROSS**, the church with two Goods stores nearby.

Further north, Millpond Road met Road 260 headed west while Millpond Road bent in a north east direction to pass east of Eadytown.

The 260 road passed through Priolow and into Orangeburg County near Congaree Post.

The railroad passing through Long Ridge north of STATE ROAD ran to near Wassamassaw Swamp where it turned northwest to cross the swamp, and Calomus Road where they put up a station at Deer Park. The logging lines ran west and south, due west and some north, and northwest and north.

E P Burton is documented in this same area.

PRETTYMAN LUMBER left Summerville to run east to Black Tom Bay, then north and back west past Appi Church and on to a sawmill just east of Wassamassaw Swamp, but not crossing the line out of Long Ridge.

It was a pleasure to review the proposed submittal, and I apologize for finding so many items that need review or correction. Your solicitation for public review probably did not result in another letter quite like this.

I graduated from THE High School of Charleston where original Historical research was required. I prepared text on Sargeant Jasper who defended Sullivans Island and Isle of Palms from British Forces.

I took Chemical Engineering at Clemson College/University and went on to work in Packaging research for over 40 years as a scientist, then Senior Scientist, then Manager and finally as Director. Although I was NOT to travel away from the central labs as company policy, I traveled extensively under special orders to nearly all the traditional breweries in the US, as well as many trips to Toronto and Montreal, and fairly often to Mexico City. I also was sent to Belgium, Germany, France, Leichtenstein, Switzerland, Italy, England and Netherlands. I also was sent to Barbados, Trinidad, Guyana, Brazil, Argentina, Peru and Venezuela on projects of one to three weeks away. I should add Curacao and Haiti where I was only there for a day.

I received a Commendation from the State Legislature of the State of South Carolina, and have had 8 books published on rail and architectural History.

The Piedmont & Northern

Palmetto Traction (Street Railways of SC)

Logging Railroads of South Carolina

Lustron Homes

Logging Railroads of the Blue Ridge and Smoky Mountains, Vol 1

The Charleston & Hamburg Rail Road

Logging Railroads of the Blue Ridge & Smoky Mountain, Vol 2

And have also written

The Santee River Cypress Lumber Company of Francis Beidler

D. W. Alderman and his ALCOLU Railroad and Enterprises

The Complete Story of The Pickens Railroad

The Complete Story of the Greenville & Northern Railroad

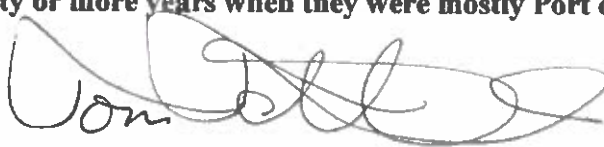
Railroads of Colleton County, SC

Phosphate Mining in the South Carolina Low Country

You can reach me by e-mail at tfetters1@comcast.net or by mail.

I am sending a duplicate copy to Palmetto Rails as I have followed their progress closely over the past sixty or more years when they were mostly Port of Charleston rail services.

Tom Fetters

A handwritten signature in dark ink, appearing to read 'Tom Fetters', with a stylized, cursive script.

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