

#E1-26400



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December 28, 2018

Ms. Diana Wood
Surface Transportation Board
Environmental Filing Docket No. FD 36095
c/o ICF
9300 Lee Highway
Fairfax, VA 220311

**Re: STB Docket No. FD 36095, Palmetto Railways—Construction and
Operation Exemption—In Berkeley County, South Carolina**

Dear Ms. Wood:

This letter contains comments on the Draft Environmental Assessment (the “Draft EA”) for the above-referenced project (the “Project”) on behalf of Weyerhaeuser Company (“Weyerhaeuser”). Weyerhaeuser owns 48,000 acres of land in Berkeley County, including more land that will be directly and indirectly impacted by the Project than any other landowner. The proposed rail line will require more right-of-way acquisition over land owned by Weyerhaeuser than any other owner along the route. As the private landowner most significantly affected by the Project, Weyerhaeuser respectfully suggests that the preferred route and alternatives in the Draft EA be examined in the context of the changing character of land uses in the Project area proximate to Highway 176. Weyerhaeuser further notes that the Draft EA plans depict only one rail yard (on the Volvo property). Weyerhaeuser expects that any additional rail yard proposed by Palmetto Railways would require separate environmental study. Also, the Draft EA contains verbiage relating to a proposed maintenance shed, but lacks specificity regarding its location or dimensions. As a result, the draft EA does not identify the full suite of impacts that the Project will have on the affected environment in the context of reasonably probable land uses.

First, the Draft EA appears to conclude that the existing use of the Weyerhaeuser property today will continue indefinitely despite the significant growth and development reasonably expected in the proximity of its property and the anticipated transformation of the highest and best uses of the property surrounding the Volvo and Camp Hall Commerce Park. For example, in Section 3.9, entitled, Land Use, the Draft EA presumes that the rail line would largely traverse timber lands with few single-family residences. See 3-67 to 3-68; see also 3-81 (noting

that the rail would traverse “a landscape characterized by evergreen timber plantations, cleared lands, and flat, open, grassy lands supporting low-density, rural land uses. Although it would pass through mostly timber lands, the proposed rail line would also pass by a few single-family residences....”).

This analysis ignores the inevitable and current transformation of the area surrounding the Volvo plant, including property owned by Weyerhaeuser impacted by the Project, from largely rural and agricultural to a high-density, mixed-use commercial and residential center. *See* VOLVO BRINGING FIRST U.S. FACTORY, THOUSANDS OF JOBS TO BERKELEY COUNTY” https://www.crda.org/news/local_news/volvo-bringing-first-u-s-factory-thousands-of-jobs-to-berkeley-county/; “Next-generation park: Utility sees Camp Hall at Ridgeville as home to 10,000 jobs” https://thetandd.com/business/local/next-generation-park-utility-sees-camp-hall-at-ridgeville-as/article_f8a491c4-2271-54f7-8dbf-5af13c2dcb4.html; “CBRE to market 88-acre tract at Camp Hall” https://www.postandcourier.com/business/real_estate/rural-comfort-communities-beyond-west-ashley-maintain-charm-as-growth/article_e6535388-022f-11e9-9380-5f1c359d9449.html; <https://www.camphall.com/>. Transportation restrictions will dictate nearby workforce residential development, as studies have shown that I-26 is facing serious congestion challenges, and a new interchange was deemed necessary to accommodate existing growth and development. <https://bcdco.com/transportation-planning/framework/>

In sum, to presume that the property surrounding the Project will remain timberlands as its highest and best use given the proposed development of Camp Hall which the Project is designed to support, ignores the fact that the character of the property surrounding the Project is presently undergoing change to support the increased demand for housing and services that will accompany the thousands of jobs that will come with the development of Camp Hall (including the Volvo site). To this end, Weyerhaeuser is actively engaged in planning for potential zoning changes and development for its property surrounding the Project. The governing administrative agencies have a duty to anticipate reasonably expected future changes to land use in the Draft EA. *See* 40 CFR § 1508.8.

Furthermore, Weyerhaeuser has concerns regarding the proposed action identified in the Draft EA. The assumptions in the Draft EA relating to Train Passbys appear to underestimate the potential impacts upon the inevitable surrounding residential and mixed use development. This impact will only increase as the Camp Hall Commerce Park matures to full build-out and utilization, resulting in a low estimate of the customers that the rail line will serve. *See* Draft EA at Summary, S-3; Sections 1-1, 2-1, 2-2, 2-20, 3-4.

Due to failures to recognize land use changes within the affected environment, numerous impacts will be greater than described. Some of these impacts may require mitigation that is not addressed in the Draft EA. *See*, for example, Section 3.1.2.2, Vehicle Safety; Section 3.1.2.3, Vehicle Delays; Section 3.7, Noise and Vibration; Section 3.10, Visual Resources and Aesthetics and Section 3.15, Socioeconomics.

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Weyerhaeuser would be pleased to work with the permit applicant and governing regulatory bodies to develop alternatives to ensure that reasonably expected changes in surrounding land use are adequately addressed in the final Environmental Assessment. In addition, to the extent that a second rail yard remains within the contemplation and planning of the applicant, it should be subjected to future environmental study. Discussion regarding the proposed location, necessity, timing and impact of the second rail yard will be critical from Weyerhaeuser's perspective.

Thank you for attention to these comments.

Yours Sincerely,

/s/ Richard D. Bybee
/s/ Jeffrey S. Tibbals

Richard D. Bybee
Jeffrey S. Tibbals

JST/ksh
cc: Keith M. Babcock, Esquire