



Palmetto
RAILWAYS

May 15, 2018

#E1-26306

Ms. Diana Wood
Project Manager, Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Camp Hall Rail Project Community Mitigation Commitments

Dear Ms. Wood:

Please accept this letter in response to your request for a more detailed description of the community mitigation measures that Palmetto Railways (PR) intends to implement as a part of the Camp Hall Rail Project (Proposed Project). PR recognizes the impacts of the Proposed Project and is committed to implementing the measures described below in the Cross, South Carolina, community to mitigate for the impacts of the proposed project. Please note these commitments are also described in the Avoidance and Minimization Plan that accompanied the Section 404/401 application submitted to the US Army Corps of Engineers on March 23, 2018. The community mitigation measures proposed by PR, which were developed in collaboration with community leaders from Cross, include:

Community Outreach

- PR will develop a Public, Agency, and Stakeholder Coordination Plan to ensure that outreach to diverse groups takes place throughout the Project to improve project awareness and education on the NEPA process. These types of coordination plans have been utilized for similar projects in the area in the past.
- PR is teaming with a local telecommunications company, Home Telecom, to provide financial assistance for a broadband infrastructure improvement program for the communities surrounding the project area. The extent and mechanism for implementing this assistance will be finally determined after input with local community leaders to ensure that the assistance meets the greatest need.
- PR will provide financial assistance for renovations and improvements to the existing Community Center and Spiers Landing recreational facility that are utilized by the Cross Community. Again, the extent and mechanism for implementing this assistance will be finally determined after input with local community leaders to ensure that the assistance meets the greatest need.
- PR will provide active warning systems with lights and gates at the 10 major roadway intersections, including advanced warning systems for three of the proposed grade crossings (Shortcut Rd, Old Highway 6 and Ranger Rd), which are all located within the Cross Community.
- PR will introduce and provide instructional programs from Operation Lifesaver, a nonprofit public safety education and awareness organization dedicated to reducing collisions, fatalities and injuries at highway-rail crossings and trespassing on or near railroad tracks (oli.org), to the

communities impacted by the Proposed Project. These will include in person, written, and online materials.

Noise and Vibration

PR will use continuously welded rail and steel ties to minimize noise associated with the operation of the rail line.

- Mitigation measures will be implemented for Pile Driving/Caissons/Drilled Shaft Foundations where applicable, and these conditions will be included in the construction contract.
 - a. The contractor will use drilled shaft foundations instead of piles, where feasible.
 - b. The contractor will use a vibratory hammer to the maximum extent practicable.
 - c. The contractor will use cushion blocks or other noise attenuation devices when using an impact hammer.
 - d. Pile driving activities shall be limited to no more than 12 hours per day (February - March, sturgeon; May - September, manatee).
 - e. The contractor will use a "soft start" for a pile driving activities (i.e. - driving does not occur at full power at first).

Air Quality

- PR will implement best management practices to minimize air emissions for the community and the environment of the region.
- The completed rail spur will comply with all applicable SCDHEC requirements.

Health and Safety

- The Proposed Project will utilize lights and gates at roadway crossings where an active warning system is warranted and appropriate.
- PR will implement early warning systems at Shortcut Road, Old Highway 6 and Ranger Road.
- PR will coordinate community workshops within the Cross community to educate residents about rail and rail crossing safety and to answer questions about the project.
- PR will coordinate with emergency services to address concerns with delays and will train local first responders on rail safety.
- PR will partner with the Berkeley County Emergency Services Division and the Cross Rural Fire District to upgrade equipment and/or facilities to improve services for the Cross Community.
- PR will provide Operation Lifesaver programs in the area.

PR is committed to being a good neighbor and being active in the community to ensure a positive and meaningful relationship and to promote safety, quality of life, and economic viability.

Should you have any questions or require any additional information, please contact me.

Sincerely,



T Ravenel
Director of Special Projects