

# COMMENT FORM

Public Scoping Meeting, Tuesday, October 27, 2015  
Military Magnet Academy  
2950 Carner Avenue  
North Charleston, South Carolina

Please note that any information (including personal identifying information) received through this form may be made available to the public online or in a paper docket, unless disclosure of the information is restricted by statute. Do not submit any information that you do not want released to the public. Electronic files should not include special characters or any form of encryption, and should be free of any defects or viruses.

Are you a public official?  NO  YES If yes, position: \_\_\_\_\_



How did you learn about this public meeting?

- Newspaper Notice
- Notice in Mail
- E-mail
- Website
- Other (please explain)

E-mail Address \_\_\_\_\_

Affiliation \_\_\_\_\_

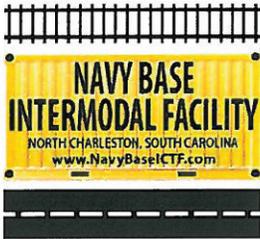
OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: *(Please make additional comments on the back, if needed.)*

*My concern is that I have Properties on \_\_\_\_\_ and \_\_\_\_\_ in North Charleston, SC. So I need to know will the Rail Road be coming in that Area.*

Comments may be turned in tonight, mailed, or emailed to the address below. Please submit your comments to:

U.S. Army Corps of Engineers, Charleston District  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403  
comments@NavyBaseICTF.com



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E-mail Address \_\_\_\_\_  
Families First LLC  
Affiliation

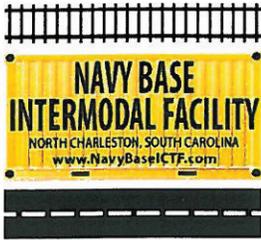
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COMMENTS: (Please make additional comments on the back, if needed.)

At the southern end of the base, will public access to the  
marina area be maintained/leased? Light, Noise,  
and Air pollution barriers placement ~~should~~ should  
be emphasized to the public living nearby.

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Are you a public official?  NO  YES If yes, position: \_\_\_\_\_

First and Last Name

Street Address

Mailing Address (if different from street address)

City, State, and Zip Code

E-mail Address

Affiliation  
*Union Heights Vice Resident*

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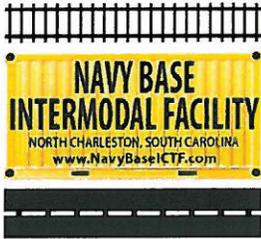
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*To what extent will the sound impact affect those close to the new road route. People are concern with displacement of neighborhood.*

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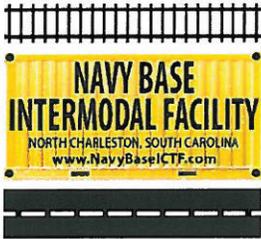
OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

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Please provide information on the interchange at Cosgrove + Spruill.

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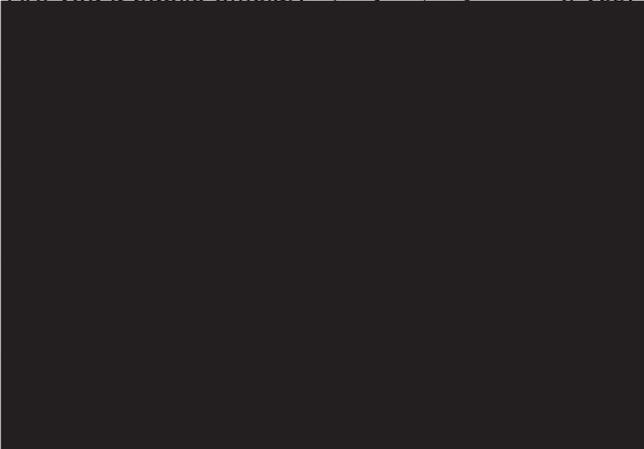


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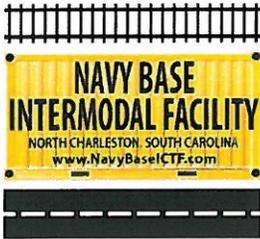
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COMMENTS: (Please make additional comments on the back, if needed.)

What a shame to waste an opportunity to  
make North Charleston more liveable.  
The Rail yard ~~THIS~~ could be moved South and this valuable  
land could be developed into restaurants, shops,  
bars - and add to the value of this city.

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E-mail Address  
metanovia / Resident

Affiliation

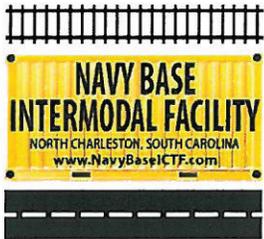
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COMMENTS: *(Please make additional comments on the back, if needed.)*

In addition to concerns already raised I am  
concerned that the increased height of the ground  
build-up for the facility will adversely affect  
drainage & flooding in Chicora / Cherokee.

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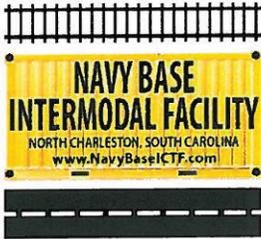
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o sound/noise impacts along with truck traffic should be studied along Virginia Ave. Rail crossing @ Naisette Blvd & Virginia Ave needs rail crossing arms along with making this a quiet zone. Quiet zone should extend further up Virginia Ave to where rail crosses Virginia Ave near Montague Ave. Consider sound barrier wall along Virginia Ave where rail is close to Old Village of North Charleston.

Comments may be turned in tonight, mailed, or emailed to the address below. Please submit your comments to:  
Please do not allow idling trains to park on Virginia Ave.

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comments@NavyBaseICTF.com

Thanks



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Signs in right of way

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COMMENTS: (Please make additional comments on the back, if needed.)

Railroad quiet zones should be a mandatory requirement of the permit, if any, along the Virginia Avenue corridor. Train horn noise is extremely disruptive, and there are residences within fifty feet of reexisting tracks. There is no justification to claim that this is outside of the "footprint" of the project when train noise

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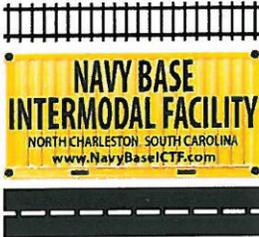
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comments@NavyBaseICTF.com

will so significantly affect the human environment and will be directly as a result of the rail yard. It is not the City's responsibility, it should be left up to Palmetto Railways. The permit for the port terminal required the SPA to comply with the Moll with the City on port development, and thus it is disingenuous to suggest the Corps has no jurisdiction over human impacts of the dramatically increased rail traffic on the Virginia Ave. corridor.

U.S. Army Corps of Engineers, Charleston District  
c/o Nat Ball  
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Charleston, SC 29403

PLACE  
POSTAGE  
HERE

**U.S. Army Corps of Engineers, Charleston District**  
**c/o Nat Ball**  
**69-A Hagood Avenue**  
**Charleston, SC 29403**



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HEARD FROM PEOPLE IN MY OFFICE.

E-mail Address \_\_\_\_\_

Affiliation \_\_\_\_\_

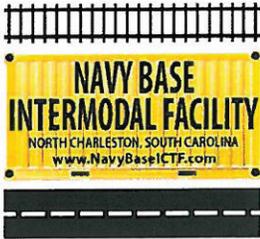
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COMMENTS: (Please make additional comments on the back, if needed.)

THIS LOOKS LIKE A GREAT USE OF THE OLD NAVY BASE, AND SOMETHING THAT WILL GREATLY HELP THE CHARLESTON AREA ECONOMY, BOTH SHORT TERM CONSTRUCTION AND LONG TERM WITH THE FACILITY. GREAT IDEA AND WELL ORGANIZED MEETING.

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\_\_\_\_\_  
E-mail Address

\_\_\_\_\_  
Affiliation

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COMMENTS: *(Please make additional comments on the back, if needed.)*

I OWN [REDACTED] WHICH IS ADJACENT TO THE BEXLEY SPUR. I AM VERY  
MUCH IN FAVOR OF THIS NEW PLAN. THE POTENTIAL FOR THE REACTIVATION  
OF THE BEXLEY SPUR HAS COST ME ONE DEAL AND DRAMATICALLY DECREASED  
THE VALUE OF MY INVESTMENT.

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Charleston, SC 29403  
comments@NavyBaseICTF.com



November 25, 2015

USACE Charleston  
69A Hagood Avenue  
Charleston, South Carolina 29403

Attention: Nat Ball

**Subject: Environmental Justice - Palmetto Railways ICTF Sept 2015**

Dear Mr. Nat Ball,

The Intermodal Container Transfer Facility (ICTF) is essential to the economic viability of the Charleston area and I strongly support the project. Presently, the environmental justice concerns regarding the ICTF Draft Revision prepared by Palmetto Railways have not been addressed. My concerns are as follows:

**The Southern Rail Connection**

The Southern Rail Connection involves CSX cargo to travel south toward the City of Charleston, loop around, and then connect to an existing CSX rail easement. During this process, the trains would block traffic along Meeting Street. Palmetto Rails indicates that this route would affect fewer residences for a lower net impact on people.

Despite the alleged lower net impact on people, the cumulative impact in the form of vibration, air quality, noise, and transit ingress egress to the Union Heights neighborhood will have a disproportionate effect on the quality of life for this community. This impact is caused when considering the both the additional trucks on the proposed Port Access Road to the south and CSX Rail cargo passing on both the northeast and southwest.

**Private Drayage Road Elements**

The private drayage road element was necessitated by a condition of the 2006 Port of Charleston EIS stating that no rail will leave the facility. The drayage road is inefficient that is only considered in the context of the 2006 Port of Charleston EIS commitment. The whole Intermodal Container Transfer Facility is against the intent of the “No Rail” commitment in the Port of Charleston EIS. For Charleston to be a world-class port city, which is in the best interest of all its citizens, inefficiencies must be eliminated. Another commitment of the Port of Charleston EIS was the allocation of four million dollars for environmental justice programs.



**Intermodal Container Transfer Facility**

The southern boundary of the ICTF is adjacent to Charleston Heights. I understand that the current plan is to build a ten foot landscaped berm to protect the residences in this community from noise generated by the facility. A height of ten feet is not adequate to protect the residents. I propose that the height of the proposed noise barrier needs to be increased.

**Conclusion**

In closing, I am completely in favor of the ICTF but if USACE Charleston is seriously interested in honoring the commitment for environmental justice, changes to the existing plan must be made. I sincerely believe in the future of this project and of the Charleston community. I would be happy to participate in any way to ensure that this project is completed in such a manner to benefit everyone affected.

Thank you,



**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 11/01/2015 06:33 PM  
**Subject:** Proposed Project

---

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Navy Yard Resident)

Comment Subject: Proposed Project  
Comment: To Whom it May Concern:

I live on The Navy Yard at [REDACTED] We use our historic house for our business located in downtown Charleston, and we also live on the property as well.

In our opinion, under the new proposal, these new structural and environmental changes being forced upon residents of Navy Yard and its surrounding neighborhoods are not acceptable and should not be implemented for the following reasons.

AIR

Upon the implementation of this project, switcher and line haul locomotives will be passing by or idling during the sectional hook ups or cold days right behind our house.

Most of the locomotives being used today produce an average of 68 pounds of pollutants per hour. My family and I along with our pets, on daily basis, will be exposed to these low quality diesel fuel emissions at aforementioned rate. Also, our property exterior will be covered with soot like most of the downtown homes due to cruise ship idling at the Charleston port.

In addition, my wife is an asthma patient. Diminished air quality is going to affect her health more than anyone in our family.

Currently, we are not experiencing any problems with air quality.

NOISE

Locomotives passing by or idling will add more noise pollution to our environment. Not limited to engine and track noise, squeaking from each railcar due to breaking and loud metal thud noises due to each railcar's couplers hitting each other will be heard during the pass. Moreover, horns will be used around my property because there

is no quiet zone in our neighborhood. The Navy Yard north end crossing and the Virginia Ave. crossing will require the train horn to be used and will be heard loudly from our residence.

Proposed earth and foliage noise barrier if built with 90 feet of dense vegetation on both sides of the rail tracks may reduce noise by five decibels if it is tall enough. Under the existing proposal, earth and vegetation planting would only serve as psychological relief, but not to physically lessen noise levels.

Currently we are experiencing a distant horn noise and it is already disturbing enough and my family does not need to experience increased levels of noise.

#### LOGISTICS

One of the reasons why we purchased our property was its zoning which is residential/ business. This allows us to live on the Navy Yard and also use it for merchandise staging, storage, and restoration.

During the restoration of our property, we added a heavy duty driveway connecting [REDACTED] for eighteen wheeler trucks bringing our containers, for our trucks and trailers. In addition, we built a wide handicap ramp to allow cargo access into our building from this driveway.

The new proposed rail tracks make it so that we would be unable to access our property property from Avenue F., and container truck access becomes impossible. Palmetto Rail's idea of removing the sections of the fence built by Navy is not functional because the fence protects us from the crime in our neighborhood.

My family has not experienced any crime because of the fence and any approach jeopardizing our security is not acceptable.

#### STRUCTURAL

Our house is built in 1917. At the distance these new tracks that are going to be built to our property, each pass ground vibration will be of discomfort in our life. This disturbing effect will also cause structural damage in a long run due to historical nature of the house.

Currently, we are not experiencing any problems with our building's structure or with ground vibration.

#### HABITAT

The historic landscape that surrounds our property is being

destroyed by this new proposal. Woodland Park located around the corner from our property will be mowed down. The landscape around us is home for different kinds of wildlife which we enjoy during the year. (One of which is a red fox along with the offspring.)

BEYOND ENGINEERING POINT of VIEW:

When we purchased [REDACTED] I was intrigued for three reasons. The land provided ample space for for my family and offered a decent living. The property was a perfect fit for our antique business as a second location. But, most importantly, owning a piece of American history was priceless. I personally worked on the restoration project for two years, and made sure the Quarters was restored to its original 1917 condition.

Even though, it was our initial intention, we have never been able to implement business part of our plan due to dark rail cloud hovering above us at the Historic Navy Yard since our purchase. Our neighborhood has been experimenting the same negative effects as well.

As you know, there are other structures that will be effected by this new proposal, among them there is an orphanage.

If the rail comes through the Navy Yard:

Part of American history will be destroyed  
 Nature is going to take a hit  
 Our neighborhood will be cut in half preventing any future residential or commercial development  
 Traffic will be worse, effecting all residents and businesses  
 Our health will be jeopardized  
 Our property value will be reduced  
 Structural issues will require more funds  
 The future of our business will be drastically effected

An interesting point, I received a letter from Palmetto Rail before the scope meeting. It's language sounded very confident, as though no matter what the outcome of your report, they have already come to the conclusion that they were going to run the rail through the Navy Yard.

I believe utilizing existing rail is the solution not building more. Please do not allow this new rail project to destroy, our history, lives and nature.

Sincerely,

[REDACTED]

**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 03, 2015 4:14 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen

Comment Subject: Proposed Project

Comment: I am informed that Low Country Orphan Relief is resisting the proposed railway on the Naval Base because it runs 79 ft from their "door." I have the following comment:

I support both the work of the LOR and the need for intermodal improvements for the Port. This is a very much needed project and should go forward as planned and as expeditiously as possible. LOR has the following options, at least:

1. Move to a more desirable location. This would be much easier than the Port trying to find an alternative to the railway plan.
2. Stay where they are and let the railway go through. They are a commercial activity which is minimally impacted by the railway being located next to their shop.

The Port is very important to the commercial network of this entire region. The railway must go somewhere and this is the best location. Let it stay as planned!

Respectfully submitted,

[REDACTED]

**From:** comments@navybaseictf.com  
**Sent:** Monday, November 23, 2015 9:04 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: NGO (The Naval Order of the United States)

Comment Subject: Proposed Project

Comment: The proposal submitted by Palmetto Railways to construct a rail line that will bisect the Charleston Naval Hospital Historic District runs completely counter to the standards of the National Historic Preservation Act. Those standards, as explained by the Advisory Council on Historic Preservation, clearly state that any project that will "alter characteristics that qualify a property for inclusion in the National Register of Historic Properties in a manner that would diminish the integrity of the property, that project is considered to have an adverse effect." "Integrity" is further defined as the ability of the property to convey its significance based on its location, design, setting, materials, workmanship, feeling and association. By every measure, the proposal violates each criteria.

Further, the proposed construction of a transit train line is inconsistent with the Secretary of the Interior Standards for the Treatment of Historic Properties in that it (1) will create an inalterable change in the property's use or setting, (2) introduce incompatible visual, atmospheric and audible elements, and (3) result in deterioration of the historic value of the District.

Specifically, the NHPA states that the government should "administer federally owned, administered, or controlled historic properties in a spirit of stewardship for the inspiration and benefit of present and future generations." 54 U.S.C. § 300101(3).

Section 106 of the NHPA regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance. 36 C.F.R. § 800.5(a)(2)(vii). Such a transfer/sale is required to include covenants that ensure adequate care which results in long-term preservation. Given that, the agreement which allows the State of South Carolina to administer the property must, by necessity, bind them to respect the historical character and integrity of the Historic District. A covenant to that effect must, by law, be included in the transfer documents between the federal and state governments.

The above cited law also requires that consenting parties must consider "reasonably foreseeable effects" of such a transfer. That one participant in the agreement, the State of South Carolina, would propose to undertake a rail line through the Historic District, knowing at the time of transfer that it intended to build a port and a servicing rail facility, makes it both reasonable and foreseeable that additional rail access would be necessary. Therefore, such probability should have been included in the discussion and made part of the agreement. If it was neither disclosed nor agreed to then the transfer would be null and void.

Before the issuance of any permit, it must be determined if a Preservation Condition was made a part of any of the multiple transfers of ownership that have involved the Historic District. A close examination of applicable zoning and land use requirements of the responsible jurisdiction, in this case the City of North Charleston, and the scope of their enforceability is in order in that the proposed project will impact property outside the ownership of the State.

In keeping with the National Park Service Guidelines for the Treatment of Cultural Landscapes, the property upon which the rail line is proposed to be constructed falls within the definition of: Historic Character; Historic Designed; Historic Vernacular; and Historic Site. The Historic Character is the sum of all visual aspects, features, materials, and spaces associated with a cultural landscape's history. Historic Designed, a landscape that was consciously designed or laid out by a landscape architect, applies in that the Hospital District is an original remnant of the Chicora Park design as planned by the renowned Olmstead Brothers. Historic Vernacular, a landscape that evolved through use by the people whose activities or occupancy shaped it, is immediately obvious when one considers the effect that loss of the open space across which the trains would operate, will remove the mental and emotional healing effects such land would have upon surface and submarine sailors accustomed to the confined quarters of shipboard life. The value of the District as a Historic Site has already been ascribed by the placement of the buildings and property on the National Register out of respect and in memory of those who served and sacrificed for freedom and liberty.

The Hospital District is but one of three contiguous National Historic Districts that contain a total of one-hundred and twenty-nine individually listed buildings. Together they tell a story that span the years from 1901 to 1996 and speaks of America's evolution into a world power. The main hospital building was such an important WPA project that President Franklin Roosevelt visited twice to check on its progress. Ensign John Kennedy, while stationed in Charleston, was treated at the facility and Helen Keller stopped in to encourage wounded service members on her morale building tour.

By virtue of its National Register status, the Charleston Naval Hospital Historic District qualifies as a Section 4(f) property under the US Department of Transportation Act and, thereby, the presumption of preservation protection. A key requirement of Section 4(f) compliance is an attempt to show whether or not a property can be completely avoided while meeting the transportation need. It states further that when the proposal under consideration uses land from one or more Section 4(f) properties, alternatives that avoid each of the properties must be evaluated. When selecting an alternative the most important point to remember is if an avoidance alternative is determined to be feasible and prudent, if so, it must be selected.

In submission of the proposal to construct a new rail line that in effect "takes" a Historic District, there has been a failure to consider what can only be described as the perfect feasible and prudent alternative. Completely outside the District, there is an existing CSX rail line that will satisfy the stated needs Palmetto Railways has put forth. By its very presence, such an option that meets the evaluation criteria requires that the permit request be denied.

**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 03, 2015 3:53 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Rail road )

Comment Subject: Proposed Project

Comment: Where could I learn more about the building of a railroad so close to Lowcountry Orphan Relief and if there might be a better alternative.

[REDACTED]

**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:15 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Proposed Project

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 26 Oct 2015 15:28:51 -0400  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** [REDACTED]  
**Affiliation:** Business (Co Owner [REDACTED])

**Comment Subject:** Proposed Project

**Comment:** Comments are in regards to the modifications to rail access from the south.

As property and business owners who support this project overall, we must make comment about the multiple at grade crossings from the southern access. There are multiple commercial and industrial businesses that will be negatively affected by trains stopped/crossing the roadway. There is no doubt a high demand for services and we expect to see lots of usage. Being able to get employees, customers and materials to our place of business is of the highest priority. We service and sell all types port related activities and being able to respond immediately is what we do. we feel that the current version of the southern access will negatively effect our business by limiting access due to the at grade crossings.

thank you for your consideration,  
[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 03, 2015 7:48 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]

Last Name: [REDACTED]

Email: [REDACTED]

Affiliation: Private Citizen (Protest against Palmetto Railways)

Comment Subject: Proposed Project

Comment: I want to protest the railroad tracks planned by Palmetto Railways to be placed a mere 75 feet from the Lowcountry Orphan Relief facility. This wonderful charity serves the most vulnerable children in North Charleston. Please reconsider the placement of these tracks or move them at least 300-400 ft. and provide a sound buffer.

Sincerely,

[REDACTED]

**From:** comments@navybaseictf.com  
**Sent:** Friday, November 27, 2015 10:33 PM  
**To:** comments@navybaseictf.com  
**Subject:** Public Involvement

New comments submitted on navybaseictf.com

First Name: [REDACTED]

Last Name: [REDACTED]

Email: [REDACTED]

Affiliation: Private Citizen (I live in the Park Circle area, Oak Terrace Preserve neighborhood: [REDACTED]  
[REDACTED] North Charleston, SC 29405)

Comment Subject: Public Involvement

Comment: My wife and I are EXTREMELY concerned about the effect of (a) loud train horns sounding at night and (b) trains blocking major roads during rush hour.

We recognize that this project will bring an economic benefits to the state and the local area, and we support this aspect of the project. However, we believe that in return for the economic opportunities provided, the railroad companies should coordinate their operations to minimize their impact on the surrounding community by not blocking roads during rush hours (7-8am and 5-6pm Monday through Friday) and by establishing Quiet Zones at all grade crossings in North Charleston (especially at North Rhett, South Rhett, East Montague (all crossings), Braddock, Spruill, Virginia, and Attaway).

Unfortunately, it is my understanding that CSX and Norfolk Southern are already violating existing agreements with the City of North Charleston to honor quiet hours and to avoid blocking roads during rush hour. My wife and I continually suffer from lack of sleep because train operators sound their horns for excessive lengths of time (sometimes 30 seconds continuously) at all hours of the night. Since these existing agreements are already being violated, I am distrustful of any verbal or written promises from Palmetto Railways that they will "do the right thing." I would STRONGLY urge the Army Corps of Engineers to require the establishment of legally binding, enforceable requirements that hold the railways accountable for their impacts on the surrounding community.

Specifically, I would like to see noise meters installed at every grade crossing to continuously monitor (a) the volume and (b) the duration of all train horn soundings. There should also be cameras to record (c) the time and (d) the duration of street closures at grade crossings. On a regular, frequent basis, these records should be compared to mutually-agreed standards (agreed between City of North Charleston and the railways), and if the railways are in violation, they should pay a significant monetary fine (e.g., \$10,000 per violation) to the City.

If there is a better way to handle enforcement, I am certainly open to hear it. I just want something to be done. I fear that the railway companies view themselves as above the law, and this public involvement process is one of our last opportunities as citizens to curb their harmful actions that are negatively affecting the neighboring community.

Thanks for listening.

11-24-2015

Mr. Nathan Ball  
Army Corp of Engineers  
via comments @ navybase ictf.com

Reference: Proposed Southern Access Rail Line

Dear Mr. Ball,

I have owned and operated a general contracting firm located at [REDACTED] since 2001. This business location has proven to be extremely convenient for my employees and clients over the years. It is my expressed desire to remain at this location long into the future.

As a contractor, time is what I sell, thus any disruption to my daily routine is sure to equal a loss in company revenues.

Your proposed new rail line servicing the port expansion will adversely effect my daily operations greatly and with more expected delays to the already burdensome BMW operations.

Please consider an alternative route to your newly proposed rail service which is currently being considered.

Respectfully submitted,

[REDACTED], Inc.

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 09/29/2015 10:06 AM  
**Subject:** Cumulative Impacts

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New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Resident of Hunley Waters Circle)

Comment Subject: Cumulative Impacts

Comment: Looking at the proposed route of tracks I have a couple questions/concerns.

1. Concerned about noise and vibration levels within our neighborhood with how close the tracks would come to St. Johns Ave. Would any type of sound barrier be constructed to alleviate noise? How will it be determined if there will be any vibration issues?
2. Concerned about the environmental impact on the marsh area surrounding Noisette Creek.

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:16 PM  
**To:** [REDACTED]  
**Subject:** Fwd: RESPONSE to the NAVY BASE ICTF (Revised Proposal)

-----Original Message-----

**From:** [REDACTED]  
**To:** <comments@navybaseictf.com>  
**Date:** Mon, 26 Oct 2015 21:24:01 -0400  
**Subject:** RESPONSE to the NAVY BASE ICTF (Revised Proposal)

[REDACTED]  
Please read the below. If you have no objections, I would like for you to email the the address below, YOUR comments that are written in RED . ~ f

[comments@navybaseictf.com](mailto:comments@navybaseictf.com)

Thank you for the opportunity to respond to the revised proposal to which I stand opposed. Specifically, my opposition is based on ANY additional rail crossings on Meeting Street Road south of the Meeting Street & Spruill Ave intersection for reasons set forth below.

Our company relocated to [REDACTED] in 2007, where we were attracted to the geographic accessibility of many area communities in Greater Charleston. This attraction diminished some years later when learning of plans to eliminate the I-26 #218 on and off ramp servicing Spruill Avenue.

Our challenge faced would be access to eastbound roadways when rail traffic (locally referred to as the "car" train) crossed and paused on Meeting Street at Cunnington Avenue. The train is so long that it will also block the crossover from Meeting Street to King Street at Discher Street. Alternative accesses to eastbound roadways would be available at the Cosgrove and I-26 interchange or the newly constructed interchange on the old Naval Base Viaduct Road. The timing delay associated with this rerouting is 15 minutes in very light traffic conditions.

This premise set forth is important because the changes you propose create a very high probability in creating substantial delays to "first responders" and other emergency personnel in the support of our area (Meeting Street Road, north of Milford and south of Tuxbury Lane) cut off by the rail crossing.

Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting our ability to gain access to our business. Our security division needs ready access to roadways in which to service the multiple security alarm systems services in the Lowcountry.

There are better solutions than the #6 Southern Rail Crossing, most notably around Kingsworth Avenue where other public authorities have taken stake.

[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no

October 21, 2015

Mr. Nat Ball  
U.S. Army Corps of Engineers  
Regulatory Division  
69-A Hagood Avenue  
Charleston, SC 29403

Re: Proposed Navy Base Intermodel Facility, Project SAC 2012-00960

Mr. Ball,

Thank you for the opportunity to respond to the request to revise the Proposed Navy Base Intermodel Facility. As a catalyst for inclusive community engagement in the Upper Peninsula, [REDACTED] is intimately involved in the footprint that this proposal adversely affects. Based at [REDACTED], [REDACTED] reach spans from Huger St. to Spruill Ave. As a result, we stand with our neighbors and are opposed to any additional rail crossings along Meeting Street Road.

Additionally, current infrastructure needs should be addressed before impact is increased. Residential cut-throughs have become an inadequate solution to increased vehicular volume and increased frustration of the existing trains schedule. There is no place for pedestrians and cyclists to safely cross over tracks, and existing tracks are currently poorly maintained.

The proposed revisions will amplify the already challenging train traffic, and work to further physically fragment the community. We need to work together to create a plan that is beneficial to the existing community and allows for future and successful development of the Upper Peninsula of Charleston and the southern end of North Charleston. These revisions are not the answer. Once again, [REDACTED] stands opposed.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

[REDACTED]

Cc: Katie McKain, Senior Planner, City of Charleston Upper Peninsula Initiative

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:13 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Opposition to Southern Rail Access

-----Original Message-----

**From:** [REDACTED]  
**To:** "comments@navybaseictf.com" <comments@navybaseictf.com>  
**Date:** Sun, 25 Oct 2015 21:24:13 +0000  
**Subject:** Opposition to Southern Rail Access

As owner of commercial property located at [REDACTED], I offer the following reasons for my objection to the proposed rail access:

1. More traffic congestion
2. Inability to get to my business location in a timely manner - [REDACTED] - Over 20 taxi cabs moving in and out of this location daily.
3. Decrease in value of my property

[REDACTED]

Sent from Windows Mail

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:17 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Navy Base ICTF

-----Original Message-----

**From:** [REDACTED]  
**To:** comments@navybaseictf.com  
**Date:** Tue, 27 Oct 2015 08:02:54 -0400  
**Subject:** Navy Base ICTF

Thank you for the opportunity to respond -- I am against your proposal. My opposition is against ANY additional rail crossings on Meeting Street Road south of the Meeting Street & Spruill Ave intersection for reasons set forth below.

Access to eastbound roadways when rail traffic (locally referred to as the "car" train) crosses and pauses on Meeting Street at Cunnington Avenue is detrimental. The train is so long that it will also block the crossover from Meeting Street to King Street at Discher Street. Alternative accesses to eastbound roadways would be available at the Cosgrove and I-26 interchange or the newly constructed interchange on the old Naval Base Viaduct Road. The timing delay associated with this rerouting is 15 minutes in very light traffic conditions. The changes you propose create substantial delays to "first responders" and other emergency personnel in the support of our area (Meeting Street Road, north of Milford and south of Tuxbury Lane) cut off by the rail crossing. I live in the area that would be cut off and find this unacceptable.

Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting my ability to gain access to my residence.

Let us now turn to other safety concerns. On multiple occasions and with great difficulty, we have contacted CSX about engines left running and unattended next to our building. The noise and diesel fumes emitted are stifling. The level of plausible deniability when addressing this and other matters with CSX has given rise to letters being sent to the company Chairman.

There are better solutions than the #6 Southern Rail Crossing, most notably around Kingsworth Avenue where other public authorities have taken stake.

[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:16 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Response to the NAVY BASE ICTF (Revised Proposal)

-----Original Message-----

**From:** [REDACTED]  
**To:** comments@navybaseictf.com  
**Date:** Tue, 27 Oct 2015 01:37:45 +0000 (GMT)  
**Subject:** Response to the NAVY BASE ICTF (Revised Proposal)

Thank you for the opportunity to respond to the revised proposal to which I stand opposed. Specifically, my opposition is steadfast against ANY additional rail crossings on Meeting Street Road south of the Meeting Street & Spruill Ave intersection for reasons set forth below.

Relocating to [REDACTED] in 2007, we were attracted to the geographic accessibility of many area communities in Greater Charleston. This attraction diminished some years later when learning of plans to eliminate the I-26 #218 on and off ramp servicing Spruill Avenue.

Our challenge faced would be access to eastbound roadways when rail traffic (locally referred to as the “car” train) crossed and paused on Meeting Street at Cunnington Avenue. The train is so long that it will also block the crossover from Meeting Street to King Street at Discher Street. Alternative accesses to eastbound roadways would be available at the Cosgrove and I-26 interchange or the newly constructed interchange on the old Naval Base Viaduct Road. The timing delay associated with this rerouting is 15 minutes in very light traffic conditions.

This premise set forth is important because the changes you propose create a very high probability in creating substantial delays to “first responders” and other emergency personnel in the support of our area (Meeting Street Road, north of Milford and south of Tuxbury Lane) cut off by the rail crossing.

Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting our ability to gain access to our business. These traffic jams would contain (among other such type vehicles) sewage trucks emitting repugnant odors while they are stalled in gaining access to the North Charleston Sewer plant whose routes have been cut off by the crossing.

Let us now turn to other safety concerns. On multiple occasions and with great difficulty, we have contacted CSX about engines left running and unattended next to our building. The noise and diesel fumes emitted are stifling. The level of plausible deniability when addressing this and other matters with CSX has given rise to letters being sent to the company Chairman.

Lastly, I have very deep concerns regarding CSX’s level of commitment to this area. I challenge anyone to compare the track conditions next to our facility. At our facility facing south, the tracks to the far right are maintained by Southern Railways. The two sets of tracks to the left, maintained by CSX. The stark comparison is quite revealing. When looking more closely, the comparison (or better stated – absence of commitment) is more noticeable by the level of trash discarded by their staff on and about the track. This issue cannot be denied because the water containers we have documented are issued by CSX.

There are better solutions than the #6 Southern Rail Crossing, most notably around Kingsworth Avenue where other public authorities have taken stake.



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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:16 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Proposed Project

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 26 Oct 2015 21:17:04 -0400  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** [REDACTED]  
**Affiliation:** Private Citizen (Property Owner)

**Comment Subject:** Proposed Project

**Comment:** Against your proposed "#6 Railway Crossing" because it will effectively cut off property owners on and east of Meeting Street Rd north of Herbert St. from the City of Charleston emergency services. The project benefits the City of North Charleston yet you are burdening the property owners in the City of Charleston with the inconvenience and hidden cost in supporting its ongoing operation. Keep you crossings north of Kingsworth Avenue.

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

October 26, 2015

Mr. Nat Ball  
U.S. Army Corps of Engineers  
Regulatory Division  
69-A Hagood Avenue  
Charleston, SC 29403

***Re: Proposed Navy Base Intermodal Facility, Project SAC 2012-00960***

Mr. Ball,

Thank you for the opportunity to respond to the request to revise the Proposed Navy Base Intermodal Facility. As a property and business owner on upper Meeting Street Road we are adamantly opposed to any additional rail traffic in this up and coming commercial corridor. We started making investments and improvements in this area many years ago and continue to work with the City of Charleston on progressive change along this corridor. Much work has been done at the city, county and community level to make this change a reality over the last few years. As I'm sure you are aware, this proposed increase in train traffic will stifle any future positive change along upper Meeting St. Rd. and is in direct conflict with the goals of the Upper Peninsula Initiative that was just adopted by the City of Charleston.

There are current infrastructure needs in the area that should be addressed prior to any consideration of additional impacts. Rerouting of the existing lines should be studied for this part of the Charleston peninsula. The low volume of train traffic that currently exists already has a negative impact on the community at large and any increase will further fragment this fragile community. Currently there are no adequate crossings for pedestrians and bicycles and no consideration has been shown to make any improvements. Increased vehicular congestion, due to an additional rail line, is not something the city or this community is interested in seeing. We are in constant contact with our neighbors and no one is happy with this revision.

We will work with Corps to come up with a reasonable solution that will help better benefit the existing community and the current goals of the City of Charleston for this part of the upper peninsula.

Sincerely,



Cc: Katie McKain, Senior Planner, City of Charleston Upper Peninsula Initiative

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, November 25, 2015 9:27 PM  
**To:** comments@navybaseicf.com  
**Subject:** Railroad

11-25-2015

Dear Mr. Ball,

We are writing to you about the proposed southern loop of the railroad that will ultimately cause us to lose our property. We own [REDACTED], Inc. My wife and I opened this business in 1994, and purchased this piece of property, [REDACTED] in 2007. Which is at the corner [REDACTED] Streets. We were off Brigade St the 1st 12 years of business. These locations are in the perfect area for my wife & I to run our business. It took our 12 year savings and a \$20,000 loan out against our home to purchase it. We deal with customers from downtown to Kiawah, and Awendaw to Summerville, but most our business is downtown Charleston. It took us almost 4 years to find a piece of ideal property for us to purchase and would be very debilitating to our family to lose it. This property was my wife and I's retirement. We had intentions to sell it in 10 to 15 years or lease it. The way Charleston is growing north and North Charleston growing south, we would make a very large profit for us to live on in our retirement. If we keep it and leased it, the property would one day belong to our children and be a very valuable piece of property as we all know there is hardly any property left in our area for sale. If we could find a fenced in, half acre with a new 5000 square foot shop in the downtown area, it would cost an arm and leg. At the present time we still have a daughter at the college of Charleston and will be heading to medical school soon. We hope that your final decision on this route of the railroad could spare us and not cause us or our company this kind of setback.

Thank you,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, November 09, 2015 4:27 PM  
**To:** comments@navybaseictf.com  
**Subject:** Navy Base ICTF follow-up and continued involvement

Dear Mr. Ball-

I attended the ICTF Public Scoping meeting on October 27 and plan on submitting more detailed comments in writing soon. I did speak briefly at the meeting on the general need to consolidate the rail lines and bring CSX back to the planning table.

I would like your consideration for inclusion in the followup discussions that will lead to the final report. Many residents of North Charleston will be making sacrifices and decisions that will last a lifetime and I believe we need to honor that with the best possible plan for the future of the region. I believe we should be looking at the impact over the next 20-40 years, including the impact to future economic development and growth to the geographic center of a growing region.

I believe my growing resident following, communications skill set, and ties to various community and neighborhood groups would add value to your process.

I recently ran (unsuccessfully) for North Charleston City Council in [REDACTED] [REDACTED]). While [REDACTED], the incumbent, won the seat, it was a very respectful campaign oriented around progress for the community and [REDACTED] and I (along with [REDACTED]) plan to work cooperatively in the near future.

During the campaign, I was able to build a community of residents through email, facebook, twitter, in-person canvassing, community meetings, and my campaign web site. I am now converting those campaign communication tools to continue to be in touch with [REDACTED] and wider North Charleston residents on important issues - including rail traffic, transit issues (public transit, sidewalks, bike lanes, roads, traffic calming), affordable housing, and community resources.

I have over 600 facebook followers on my community page and participate in several other community pages. I have an email distribution list that is 400 households and growing, and I received 527 (32%) of the vote in my district. I also have relationships with several local churches, the Metanoia group, the Upper Peninsula Initiative, and contacts in the cities of North Charleston, Charleston and the county of Charleston.

In my professional life, I am the CFO for [REDACTED] (since 1996) and I serve on the [REDACTED].

I appreciate the evaluation role that ACE has and I believe there is still room for this project to further improve. I believe we have a huge opportunity in this plan to re-align and consolidate rail traffic so that the upper peninsula, neck, Union Heights, Chicora/Cherokee, Park Circle, Liberty Hill, and Charleston Farms neighborhoods (as well as those outer neighborhoods also rail adjacent) can not only reduce the impact of future rail traffic, but lessen the impact for the rail traffic that already exists.

I would welcome the opportunity to speak with you at your convenience.

Best regards,



**From:** comments <comments@navybaseictf.com>  
**Sent:** Monday, November 30, 2015 2:49 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Opposition to Southern Rail Connection

-----Original Message-----

**From:** [REDACTED]  
**To:** <comments@navybaseictf.com>  
**Cc:** [REDACTED]  
**Date:** Fri, 27 Nov 2015 22:50:06 -0500  
**Subject:** Opposition to Southern Rail Connection

I own two pieces of property, [REDACTED] and [REDACTED], which will be grossly affected by the proposed railway. My business, [REDACTED] Inc., is located at the corner of Meeting and Herbert Streets. Our business services primarily commercial truck customers. Currently, these tractor trailers must turn onto Herbert Street to access the property behind our building to be serviced. The front parking lot on Meeting Street is not large enough to accommodate this necessary service. I have two warehouses; one on Herbert Street and one on Harmon Street. I also have a manufacturing plant on Harmon Street. All of these buildings, also including the front shop, receive daily deliveries from various vendors. In addition, my employees work outside adjacent to Herbert Street 20-25 feet from the proposed track.

I am extremely concerned how this proposal by Palmetto Railways is going to affect my customers, vendors, and employees. Some of my concerns include access for customers/vendors, worsening traffic congestion, decreased property values, noise/vibration problems, and health effects for my employees working in such close proximity to the track.

Currently, there are existing grade crossings a block before (Meeting/Cherry Hill) and a block after (Meeting/Milford) the intersection of Meeting and Herbert Streets. It seems these existing tracks could be adapted instead of creating another grade crossing, which would total 3 crossings in a 3 block section of Meeting Street. There is great concern regarding the blockage these crossings create to traffic on Meeting Street. But, I am even more alarmed that the blockage could prevent my customers/vendors from accessing and being serviced by [REDACTED] Inc.

The proposed plan calls for one long 8% curve that crosses over multiple properties to connect the 2 lines. The same result can be achieved by connecting a new line at Milford. The current line that is dedicated to Kinder Morgan can be moved over to allow for a new parallel Intermodal line at Milford. This new line would not be a continuous 8% curve as the current plans shows, but an 8% curve then a straight line with an 8% curve on the other end to connect the two tracks. This would limit the amount of new track and would not disrupt long time existing businesses in the area. It would also keep the railroad tracks all together in one area. According to the exhibited drawings, there are already 8 tracks in this area and there appears to be room for a ninth line to be added.

In closing, I want to state that I am very opposed to this proposed "southern rail connection". I believe it will harm my current business and property value. I believe other solutions are possible to achieve Palmetto Railway's objective without damaging many existing businesses.

Thank you,



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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 03, 2015 9:01 AM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen

Comment Subject: Proposed Project

Comment: Palmetto Railways is planning to route a section of their railway in extremely close proximity (75 feet) to the Lowcountry Orphan Relief building located in North Charleston. This action would prove very harmful to the mission of this great organization which provides a critical and irreplaceable life-line of hope and support to the most vulnerable children of North Charleston and surrounding counties. The proposed location of the track would subject the children and their supporters to unbearable noise levels, and exposure to diesel fumes. Additionally, the closeness of the track, a mere 25 paces from the doorway, would ruin the property value making any sale for relocation almost impossible. Surely, reasonable people can agree on other options. Palmetto Railways owns many adjoining acres of land...can they not modify the route of their track so as not to negatively impact valuable services to our needy children. Please use all influence and decision making power you have to save our Lowcountry Orphan Relief program!

**From:** comments@navybaseictf.com  
**Sent:** Wednesday, November 25, 2015 2:19 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Community member)

Comment Subject: Proposed Project

Comment: I agree with other members of my neighborhood who so eloquently addressed our concerns in this letter. The plans for the ICTF are threatening this delicate balance that the City of North Charleston is striving to achieve and maintain. Thus far, it is obvious that the economic impact of the proposed facility and railroads has been considered and there are many who stand to profit from this venture. However, now another “E”—the environmental impact, not solely the economic impact—must be considered, and this needs to include the quality of life that North Charleston is striving for. The fact that the city has opposed many facets of this facility is notable, considering that it is coming from a city which works hard to encourage economic growth and opportunity. The residents of North Charleston, while far from resenting the industry that thrives in their city, feel taken advantage of in the underhanded proceedings surrounding the plans for the new port and the ICTF. The current plans for the port, ICTF, and rail traffic are drastically different from what residents relied on when first accepting the idea of the new port being located in their city.

If the ICTF plans are carried out as proposed, residents of North Charleston will be faced with increased rail traffic along with accompanying noise, pollution, and loss of aesthetics and opportunities. For the sake of the residents who would be forced to bear the burden of these new facilities, the following three concerns need to be addressed by the environmental impact study:

1. Communication and dialogue: Residents should have an opportunity to dialogue (in contrast to a monologue, as was pointed out at the last public meeting) with those in charge of the planning for both the port, the ICTF, and the railways. Since residents are being asked to shoulder the negative impacts of the new facilities, they should have the opportunity to meet with those who benefit financially from these facilities. I believe the financial stakeholders should be willing (required, if not willing) to talk face-to-face with those who live, work, breath, and raise families in close proximity to their business ventures. This will go a long way toward improving local perception of the facilities. It is by no means a new concept that a business venture entering a community should work to include the community members and ensure that they are valued and listened to. This has not happened yet in this project, and it needs to occur. The last public scoping meeting I attended had the feeling of a legal formality rather than a real opportunity to listen to the community. Other industries that have come into the area have demonstrated the willingness to show concern for residents and have thus been well-received. One particular business near our house has sent representatives to our neighborhood meetings, sent out e-mails letting residents know about issues that may affect them, and set up a community relations panel that holds regular meetings at which members of the community can receive updates and voice complaints.
2. Ongoing pollution—both noise and air quality: The amount of increased noise and air pollution likely to be generated by the ICTF and the associated rail traffic needs to be studied along with its environmental and health impacts. The findings need to be thoroughly and promptly reported to the community and steps taken to mitigate them both in the planning stages and going forward into the future, as the amount and effects of noise and air pollution could significantly change over the life of the ICTF.
3. Access to current waterfront parks as well as river access in general: The environmental impact study needs to carefully assess how the plans for rail exiting the ICTF affect residents’ ability to access and enjoy the waterfront of North Charleston both now and in the future. The current proposal for the ICTF, which calls for train traffic extending for miles north along the river, would cut off the residents of North Charleston from access to the river. North

Charleston’s extensive riverfront should be enjoyed as one of the city’s greatest assets, just as it is in other areas. For example, on the nearby peninsula of Daniel Island (the original site of the planned port), quiet boardwalks and parks line the rivers and marshes. Leading industrial cities across the nation have been realizing the immense impact that a human-focused waterfront can have on their communities. These cities have been reclaiming their waterfronts and experiencing the economic goldmine of an aesthetically-developed waterfront. The residents of North Charleston, in accepting a facility that will benefit individuals outside of the community financially, should not be denied access to one of their greatest natural resources. The two places that now exist for residents to enjoy the waterfront are Riverfront Park, located on the Old Navy Base, and Hendricks Park, along Virginia Avenue. The map of proposed rail traffic demonstrates that residents will be cut off from both of these parks—and from future utilization of riverfront properties—by trains exiting the ICTF. The current rail lines that exist along the river are not heavily used, and my family currently enjoys biking to both Riverfront Park and Hendricks Park. Crossing the rails with our children is not a problem as these rails are rarely used and the enjoyment of the parks is rarely interrupted by passing trains. Residents have been inadequately informed of just how much rail traffic would be going through these areas, not to mention that any current estimates could easily be surpassed if the port is successful (as developers are surely hoping it will be). In directing the rail traffic as it exits the ICTF, residents’ right to access their waterfront must not be denied. Solutions can be found that do not inhibit the residents of North Charleston from enjoying the current parks along the river and striving for an aesthetically pleasing riverfront for the future. Obviously, the port needs to be located on the river, but there is no necessity for rail traffic to be directed along the river at all.

The State Ports Authority had originally planned to build on the south end of Daniel Island. However, the residents of the relatively new, affluent development on Daniel Island successfully fought having the port built on their peninsula. The State Ports Authority relocated their plans across the river to North Charleston, and the port and related industry are now threatening the more established but less economically advantaged neighborhoods there. My family used to live on Daniel Island and while we enjoyed our time there, we have found a home in North Charleston—a unique place where diversity exists and is trying to thrive—racial diversity, economic diversity, and diversity of land use. Industry exists alongside residential areas and people feel a sense of community because they do “live, work, and play” here. The Environmental Protection Agency states that environmental justice “will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.” I am writing in the hope that people with consciences will consider issues of environmental justice and how to preserve the special balance that exists in North Charleston and not allow a unique and established community to be “railroaded” for the sake of economic gain.



[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:18 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Proposed Project

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 22 Oct 2015 10:24:05 -0400  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** [REDACTED]  
**Affiliation:** Business (Public Notice Number SAC-2012-00960.)

**Comment Subject:** Proposed Project

**Comment:** We operate a business, [REDACTED] Inc., at [REDACTED], at the corner of Viaduct Rd and Spruill Ave. We would like to see a rendering of the final result of the removal of Viaduct Rd to our north, and the railway development to our east.

[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments@navybaseictf.com  
**Sent:** Wednesday, November 25, 2015 2:21 PM  
**To:** comments@navybaseictf.com  
**Subject:** Cumulative Impacts

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (ICTF North Charleston SC)

Comment Subject: Cumulative Impacts

Comment: I have great concerns regarding the proposed container transfer facility in North Charleston and I feel that it would greatly diminish the quality of life the many people who call North Charleston home.

As an avid fisherman the proposed rail yard and the increased traffic it would generate would cut off access to waterfront for this growing community to enjoy. I understand economic growth is needed however it can not be at the expense of those who live work and play in North Charleston.

**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 10, 2015 9:05 AM  
**To:** comments@navybaseictf.com  
**Subject:** Affected Environment

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Resident on Bexley St)

Comment Subject: Affected Environment

Comment: We have lived on Bexley Street near the intersection at Spruill avenue. The rail traffic has steadily increased since we moved in 2 years ago. We understood when we bought the house that having a train go by would be part of the neighborhood, but it has begun to effect our quality of life. The trains blow horns all hours of the night, despite it being a quiet zone. The trains alone are loud enough to wake us at 2 and 3 in the morning. The increased weight that the trains have been carrying is causing our house to shake to the point that the ceilings are beginning to fall in. Cracks run throughout the home, despite having a solid foundation. Rail line traffic jams cause stuck trains on both the Bexley line as well as the one crossing North Rhett on a daily basis. Please, PLEASE do not increase the rail traffic Through residential areas. At the very least consider a sound barrier running the length of the line through residential districts. I am a business owner in the area and try to do what I can to contribute to the progress that Park Circle has made over the past decade. But if the rail traffic continues to get worse we will be forced to move and leave the area all together.

Should you have any questions about our experience or would like to inspect the house please do not hesitate to reach out.

Thank you for your time and consideration.

[REDACTED]

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Wednesday, October 28, 2015 11:05 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Public Involvement

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 27 Oct 2015 14:45:14 -0400  
**Subject:** Public Involvement

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** [REDACTED]  
**Affiliation:** Business ([REDACTED])

**Comment Subject:** Public Involvement

**Comment:** We've registered our vote against the railroad that will go directly in front of our property. We will no longer be able to have our children's events in the front area, as well as additional parking for our volunteers and guests. The railroad will be not only an eye sore but cause noise issues during business hours.

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Wednesday, October 28, 2015 11:06 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Preferred Alternative

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 28 Oct 2015 09:14:42 -0400  
**Subject:** Preferred Alternative

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** [REDACTED]  
**Affiliation:** Other (Founder of [REDACTED])

**Comment Subject:** Preferred Alternative

**Comment:** We at [REDACTED] have just finished building a new Distribution Center costing \$425,00. We have been in business serving three counties, 68 agencies and 29 Title I schools and have abused children on our property for classes throughout the summer and winter. The railroad is within 100 feet of our property causing sound, smells, earthmoving and environmental effects on our much loved and needed buildings and mission. Please move the tracks further away from our building or build a large sound barrier or give us land that will equal or be better than what we have at the present. We have asked for one million to get land, build again and re-establish five separate buildings that we now own and operate out of. This is not a favorable location that has been selected and we would like to work with the railroad in pleasing everyone. [REDACTED], Founder of [REDACTED]  
[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 10/30/2015 11:13 AM  
**Subject:** Affected Environment

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New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen

Comment Subject: Affected Environment

Comment: "...an internal railyard is likely to have substantial impacts on existing transportation infrastructure and the adjacent community that extend well beyond the scope of the impacts evaluated in the EIS for the port facility and access road..." Tina Hadden November 13, 2008. I agreed with the Regulatory Chief then and I hope her position has not changed as this project will have severe impacts on the surrounding environmental justice communities. The EIS should include a social impact assessment of neighborhoods within a 10 mile radius to include the Bennett Yard Road CSX intermodal yard.

[REDACTED]

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**From:** comments@navybaseictf.com  
**Sent:** Wednesday, November 04, 2015 3:14 PM  
**To:** comments@navybaseictf.com  
**Subject:** Affected Environment

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (North Charleston Resident)

Comment Subject: Affected Environment

Comment: The use of EPA's EJ Screen to establish a consistent and transparent approach for identifying potential communities with environmental justice concerns.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 24, 2015 4:15 PM  
**To:** comments@navybaseictf.com  
**Subject:** [REDACTED]

Hello,

We are writing as a business on [REDACTED]. Our business is already affected by the train due to the road being blocked when it is passing by during business hours. We often times have traffic backed all the way up to our business and down the road when that happens (sometimes right around the 4:30 or rush hour traffic times). Sometimes this happens more than once a day and we are in a part of the road that we cannot always “race” to beat the train to get out of the blockage. As a business that is planning to expand in the next couple months, we will have a front office space being leased out, and we fear that the new Southern Rail Connection could be a reason for people to look elsewhere - it’s noisy, annoying when the road is closed and sometimes can be dangerous. The tracks we have directly to the back of us, also draws loitering when the train cars are parked, which is always a concern to us as an office of all women.

We hope that you consider this when making the decision about the new Southern Rail Connection.

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:18 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Intermodal Facility

-----Original Message-----

**From:** [REDACTED]  
**To:** "comments@navybaseictf.com" <comments@navybaseictf.com>  
**Date:** Sun, 25 Oct 2015 11:40:10 -0400  
**Subject:** Intermodal Facility

Please keep in mind not only the trains but the horns that they blow at each and every crossing. Two longs and a short or whatever but at 4 or 5 AM, it definitely ruins a night's sleep.

Thanks

Sent from my iPhone

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

[REDACTED]

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**From:** comments <comments@navybaseictf.com>  
**Sent:** Tuesday, October 27, 2015 1:15 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Affected Environment

-----Original Message-----

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 26 Oct 2015 20:22:04 -0400  
**Subject:** Affected Environment

New comments submitted on navybaseictf.com

**First Name:** [REDACTED]  
**Last Name:** [REDACTED]  
**Email:** edistosc@gmail.com  
**Affiliation:** Private Citizen

**Comment Subject:** Affected Environment

**Comment:** In Ravenel is an about to be adopted commercial / industrial special district (Spring Grove) that will need rail access for both goods and commuting workers. In your design please provide for these features in the future.

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

**From:** comments@navybaseictf.com  
**Sent:** Wednesday, November 25, 2015 12:12 PM  
**To:** comments@navybaseictf.com  
**Subject:** Cumulative Impacts

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Business ([REDACTED] Inc.)

Comment Subject: Cumulative Impacts

Comment: [REDACTED], Inc. is a manufacturer and installer of prestressed concrete piling. Our product is used in deep foundation work throughout the area and is always on the critical path of any construction project that we're awarded. Examples of the projects that we've serviced in the past 24 months include hospitals, manufacturing facilities, parking decks, multifamily / student housing projects, and many other time sensitive owners. We are located at [REDACTED] and have significant concerns regarding the expansion of the rail service parallel to North Meeting Street. It is certain to have an impact on the cost and schedule of our manufacturing and installation operations.

In general, our work follows the pattern outlined below:

1. We are awarded a contract for a project and are mobilized on site within weeks to begin load testing.
2. Once load tests are completed, we begin casting concrete piles specific to each project. We utilize 8-18 loads of concrete each day and casting must continue in a uniform fashion once the pour starts. Concrete pours can last 2-5 hours depending on the days demand and can experience significant and costly quality issues if delivery of the concrete is delayed.
3. Within a week of beginning production of piles, we start installation of the product. Our pile driving rigs are fed directly from pile supply at our yard with 2-4 trucks delivering 10-25 flatbed loads each day. With limited laydown space on projects, the efficiency and profitability of our installation operation is dependent upon consistent and timely delivery of piling cast and delivered from our Pittsburgh Avenue location.

The process described above runs in a continuous and time sensitive cycle with the constant threat of claims for damages if the process is delayed outside the responsibility of the owner / GC.

As you can see from the general description of our work, additional rail traffic on an already busy line would have significant impact on the supply of time sensitive raw material (concrete) to our plant and to the delivery of finished product to our onsite driving rigs. With crews and equipment in both locations that run hundreds of dollars per hour servicing projects with liquidated damages that are, at times, tens of thousands of dollars per day, you can understand our concern with added restrictions that will undoubtedly limit and delay our supply chain.

Beyond the regular 10-15 minute delay experienced with each train that crosses Pittsburgh Avenue, we have experienced at least 2 road blockages in the past 12 months that have lasted hours and meant the costly shut down of our operation. Increased traffic will only increase the number of regular delays that interrupt our process and increase the likelihood of delays that would leave us idle for the day.

We also have concerns for the safety of our employees, many of whom utilize the public transit system and walk each day from the intersection of North Meeting Street and Pittsburgh Avenue to our location. Additional rail lines and traffic will only increase the possibility of injury or fatality as these valued employees make their way to work each day. In

addition to the added risk associated with the commute, we have significant concerns regarding the ability of emergency vehicles to access our site in the event of a medical or property emergency.

We request that the impact to our business, the safety of our employees, and the concerns of other businesses around us be considered carefully prior to finalizing plans for the rail expansion. Should you have any questions or need additional information, please don't hesitate to call.

Best,



**From:** [REDACTED]  
**To:** comments@navybaseictf.com  
**Date:** 09/28/2015 10:17 PM  
**Subject:** Proposed Navy Base Intermodal Facility

---

We are residents in the Hunley Waters community which is located off of St. John's/O'hear Ave on Noisette Creek. We moved here last October and are frequently awakened nightly by the loud horns of the trains. The horns are usually heard from 1 am on. It's not unusual to be awakened and remain awake for several hours due to the noise. Half of our neighborhood backs up to Noisette Creek like our home does. The noise is amplified over the water. There are 36 homes in our neighborhood and we have talked to our neighbors, many who are having the same problem. What we don't need is more noise!!!! I am certainly not an engineer but I know there is a lot of industrial property on the old navy base that is not surrounded by homes that might be better utilized for this project. If more trains are brought closer to our neighborhood we will suffer not only in lost sleep but in lower home values. We live in some of the most expensive homes in the area and we worry that the financial impact on us could be significant as no one will want to live where they can't sleep!!

We are also concerned about how this plan will affect traffic. While we understand trains are necessary, we spend a lot of time in traffic waiting for them to pass. We are frequently waiting on Spruill Ave.as trains pass since the O'Hear bridge has been closed and under construction since September 2014. We are looking forward to the opening of the new bridge next month. However, it is our understanding that the Spruill Ave.bridge is being replaced next and will be closed for a year as well. That closure compiled with train line construction could make entrance and egress virtually impossible for us. We hope that you will consider the impact this plan will have on the residents of Hunley Waters and St. John's Ave. as you move forward.

--

[REDACTED]

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 09/29/2015 08:23 AM  
**Subject:** Proposed Project

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New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Proposed Navy Base Intermodal Facility)

Comment Subject: Proposed Project

Comment: We are residents in the Hunley Waters community which is located off of St. John's/O'hear Ave on Noisette Creek. We are natives but moved over here last October from Mt. Pleasant. We are frequently awakened nightly by the loud horns of the trains. The horns are usually heard from 1 am on. It's not unusual to be awakened and remain awake for several hours due to the noise. Half of our neighborhood backs up to Noisette Creek like our home does. The noise is amplified over the water. There are 36 homes in our neighborhood and we have talked to our neighbors, many who are having the same problem. What we don't need is more noise!!!! I am certainly not an engineer but I know there is a lot of industrial property on the old navy base that is not surrounded by homes that might be better utilized for this project. If more trains are brought closer to our neighborhood and a second train bridge over the creek, we will suffer not only in lost sleep but in lower home values. We live in some of the most expensive homes in the area and we worry that the financial impact on us could be significant as no one will want to live where they can't sleep!!

We are also concerned about how this plan will affect traffic. While we understand trains are necessary, we spend a lot of time in traffic waiting for them to pass. We are frequently waiting on Spruill Ave. as trains pass since the O'Hear bridge has been closed and under construction since September 2014. We are looking forward to the opening of the new bridge next month. However, it is our understanding that the Spruill Ave. bridge is being replaced next and will be closed for a year as well. That closure compiled with train line construction could make entrance and egress virtually impossible for us. We hope that you will consider the impact this plan will have on the residents of Hunley Waters and St. John's Ave. as you move forward.

**From:** comments@navybaseictf.com  
**To:** comments@navybaseictf.com  
**Date:** 09/29/2015 09:53 AM  
**Subject:** Proposed Project

---

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Resident living in Proposed Project Area)

Comment Subject: Proposed Project

Comment: Looking at the map and the proposed project, the area surrounding will be significantly affected negatively. This project will cut through an area many have invested as their home and would devalue any possible future investments. More importantly, trains in the area already prove to be a nuisance as the noise has kept area residents up at night. Please, I beg you, do not follow through on this project!

[REDACTED]

---

**From:** comments <comments@navybaseictf.com>  
**Sent:** Wednesday, October 28, 2015 11:05 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Proposal Navy Base Intermodal Facility - Opposition  
**Attachments:** NBIF.pdf

-----Original Message-----

**From:** [REDACTED]  
**To:** "comments@navybaseictf.com" <comments@navybaseictf.com>  
**Date:** Tue, 27 Oct 2015 21:24:30 +0000  
**Subject:** Proposal Navy Base Intermodal Facility - Opposition

To whom it may concern,

Could you please pass along the attached letter to Mr. Ball?

Sincerely,

[REDACTED]

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The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

October 27, 2015

Mr. Nat Ball  
U.S Army Corps of Engineers  
Regulatory Division  
69-A Hagood Ave.

**RE: Proposed Project for the NBIF**

Dear Mr. Ball,

I want to thank you for taking the time to respond to people and business owners of Charleston in regards to the new proposal of the Navy Base Intermodal Facility. Like many Charlestonians, I love my city and understand that more people are moving here every day, which is starting to cause some congestion issues at times. Since many people are moving here it is causing jobs to grow, which is great for our community and economy. Many businesses have begun to move towards upper King and Meeting Streets.

Because of laws within the city, businesses cannot build more than five stories and have started to move west to upper King and Meeting Streets. From what I understand the new rail proposal will also be moving this direction and crossing more roads than the current rail. This is only going to cause frustration with business owners and developers in the city that are trying to expand. The newly proposed rail line will cause more congestion in a city that is already struggling with transportation issues, flooding, and neighborhood parking.

The city planners and officials are trying to solve the issues and better the city for the people that enjoy Charleston for what it is. A new rail that comes into the city's commercial district will only only cause more congestion and frustration among citizens that already struggle with the issue. If you would, please consider what the City of Charleston has been working on for years so businesses can continue towards upper King and Meeting without the worry of any further city congestion.

Thank you very much for you time, Mr. Ball.

Sincerely,





**From:** comments@navybaseictf.com  
**Sent:** Tuesday, November 03, 2015 3:59 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Physician)

Comment Subject: Proposed Project

Comment: Dear Sirs,

I have long been a donor to the Lowcountry Orphan Relief Project. They are one of the best charitable organizations in Charleston, SC. No one else is there to provide clothing, shoes, underwear, toiletries, books, stuffed animals, and books to the many, many foster children in this area.

If you build your railroad so close to their building, I fear they will no longer be able to continue their work. Please count me as one citizen who is concerned about this situation.

Very sincerely yours,

[REDACTED]

October 27, 2015

Mr. Nat Ball  
U.S. Army Corps of Engineers  
Regulatory Division  
69-A Hagood Avenue  
Charleston, SC 29403

***Re: Proposed Navy Base Intermodal Facility, Project SAC 2012-00960***

Mr. Ball,

Thank you for taking the time to listen to those in opposition of the proposed Naval Base Intermodal Facility. As a property owner on the Upper Meeting St corridor, we are in strong contention of any additional rail traffic, and the subsequent bottleneck effect it would have on the entire area as whole.

Many businesses, individuals, and groups have been working directly with the City of Charleston to develop this area in a positive manner. The proposed plan would serve to counteract all that is envisioned for the area.

It is our desire to work with the Corps to come up with an alternate plan. A plan that is beneficial to the community as a whole, and meets the goals of the City of Charleston and the business and property owners within this corridor.

Sincerely,

A large black rectangular redaction box covers the signature and name of the sender.

Cc: Katie McKain, Senior Planner, City of Charleston Upper Peninsula Initiative

[REDACTED]

---

**From:** comments@navybaseictf.com  
**Sent:** Wednesday, November 18, 2015 12:29 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Business (law firm)

Comment Subject: Proposed Project

Comment: This needs to be fairly negotiated which it is not with the tracks going so close to other peoples property which took them years to purchase, rehab and enhance. Stop the big business bully and do what is right. At least be fair and be glad that there are people who are actually trying to do something good for our state. The Palmetto Railways must have someone who is creative enough to device another route among o much land!!!!

[REDACTED]

---

**From:** comments@navybaseictf.com  
**Sent:** Monday, November 02, 2015 1:02 PM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Local Property Owner - Rail Road)

Comment Subject: Proposed Project

Comment: Hello,

There is a proposed rail road addition to be made in the St. John's Avenue area of North Charleston. I understand there is much to be planned and the formalities are still in the making. The intent of this comment is to tell you how the new rail would impact myself, my husband and my neighbors negatively.

We view the area of St. John's as up and coming. While at the moment, it is not the safest, nor the most well developed area of North Charleston, though we certainly hope it gets there! Our interest in finding a home this area were for this very reason - we believe that the area is indeed up and coming for a revitalization. The new construction of the O'Hear bridge, the new restaurants being added to Olde North Charleston, the new developments throughout Park Circle really give us hope to that area. [REDACTED] off of Avenue F (close to St Johns), Hunley Water's behind us, and the new bridge really give me hope that safety and revitalization is about to happen in this area. I feel, along with my husband, that the addition of new rail tracks will only deter future growth in that area. Our concerns for our personal safety in the area, paired with new safety concerns with a railway, not to mention any noise pollution or physical pollution the railway would cause. This proposed addition makes us worried not only for ourselves and our property, but the neighborhood and area as a whole.

[REDACTED]

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**From:** comments@navybaseictf.com  
**Sent:** Monday, November 02, 2015 12:22 PM  
**To:** comments@navybaseictf.com  
**Subject:** Cumulative Impacts

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen (Resident on St Johns, [REDACTED])

Comment Subject: Cumulative Impacts  
Comment: To whom it may concern,

My primary concerns lies with health issues and property damage as a result of the proposed rail tracks. The tracks will cross in front of my family's, and others homes within close proximity.

Links to childhood asthma and the developement of cancer have both been found for individuals living in close proximity to rail tracks. I fear the needs of the railroad are being placed before the safety of the children my wife and i plan to have. Kids attend 1 of several schools off of St Johns and play in the streets. The decision to lay track here would negatively effect the Noissette community's youth as a whole.

Also of concern to my wife and I are devaluation of our newly bought home and longterm structual damage from constant vibrations. There are not too many people willing to buy a house with train tracks essentially in the front yard. Horns and squeeling metallic sounds at all hours dont make an easy sell. A well built sound barrier that would add to the community rather than detract might help here. I do not know what could alleviate longterm structual damage, however.

Other concerns that my family and I worry about include traffic patterns, as a train parked on Virginia would stress an already at capacity N Rhett in the morning, and Riverfront Park becoming cut off as trains become more frequent.

My wife and I are trying to keep an open mind, as there is no perfect solution for all. The possibility of new tracks has alarmed us, though, and we can't see too many benefits from our point of view.

[REDACTED]

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**From:** comments@navybaseictf.com  
**Sent:** Wednesday, September 23, 2015 2:07 AM  
**To:** comments@navybaseictf.com  
**Subject:** Proposed Project

New comments submitted on navybaseictf.com

First Name: [REDACTED]  
Last Name: [REDACTED]  
Email: [REDACTED]  
Affiliation: Private Citizen ([REDACTED] property owner. )

Comment Subject: Proposed Project

Comment: To whom it may concern and in regards to Public Notice Number SAC-2012-00960: This comment is being written on September 23, 2015. There has been an ongoing survey very recently on the northern end of the navy yard. There are survey stakes and markers everywhere. Some of these stakes are literally through my back yard. There has been no public announcement to indicate that the proposed rail track has changed. However, the survey stakes are a stark indication that it HAS indeed changed. I am a private citizen, my property was purchased solely for residential use, even though its zoned for dual purposes, both residential and commercial. I have two small children, ages 5 and 7. The presence of these stakes, and their implications are of grave concern to me and my young family. When are you planning on notifying the public of the rail lines' new intentions? How close to my home is the railroad allowed to build????? Their markers are not more than ten yards from my back door. Are there any plans of updating this information in the near future?



November 24, 2015

**Via Email: Comments@navybaseictf.com**

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp of Engineers  
69-A Haygood Ave.  
Charleston, SC 29403

Re: Proposed Project for NBIF

Dear Mr. Ball:

I am writing to provide comments regarding the southern rail connection proposed for the ICTF in North Charleston.

Our [REDACTED] is located at [REDACTED]. We share a parking lot with [REDACTED] at [REDACTED], which will likely be condemned for a right-of-way as part of the project if the southern rail connection is permitted. We have many concerns regarding the southern rail connection, including the impact on our local business community, as well as our business in particular.

Our [REDACTED] is involved with maritime issues, and often responds to the investigation of marine accidents and appearances in Court. We are concerned regarding the length of container trains that would occupy Meeting Street Road for extended periods of time, greatly limiting our access to downtown and East of the Cooper. Our access is already directly impacted by the closure of the Spruill Street exit and entrance which is proposed for the new terminal truck access. Additional impacts by extended rail delays on Meeting Street Road will therefore greatly exacerbate the effect of the dedicated truck access.

In addition, because the premises we occupy is next to the railroad tracks, the existing short trains running on the CSX line create only intermediate disruptions. However, the longer intermodal trains will cause excessive vibration for extended periods of time and interfere with our ability to work, and to conduct conferences with clients and other parties.

In short, we are concerned about the direct impact on our parking facilities, the extended delays for important travel by our employees, and the impact on meetings and work areas imposed by vibrating trains.

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp of Engineers  
November 24, 2015  
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Thank you for your attention to the above.

With best regards, I remain





Tina Hadden  
Army Corps of Engineers

Re: Southern Access

Dear Ms. Hadden,

It has been brought to our attention of a proposed new rail connection. The project would result in containers well over a mile long. It would traverse over a new railroad crossing that would block Meeting Street, Herbert Street, Cherry Hill Lane and Pittsburg Avenue.

The present railway has already been causing major traffic issues for our area. This would also include the inability for vendors to enter or exit from our property. Our much needed taxis on the roads of the Tri-County are many times held up because of the train travel. It has created a safety issue as well being only feet from our front door.

I see this present problem only being exacerbated by this proposed additional Southern Rail Connection. I also see it affecting negatively the value of our property. I realize these connections must be important or would not have been considered of being built.

Yet, I feel it would create major problems for our area. I respectfully ask that you consider the negative impact on our and surrounding businesses.

Thank-you for your consideration of my thoughts.



[REDACTED]

November 24, 2015

**Via Email: Comments@navybaseictf.com**

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp. Of Engineers  
69-A Haygood Ave.  
Charleston, SC 29403

Re: Proposed Project for NBIF

Dear Mr. Ball:

I am writing on behalf of [REDACTED] to provide comments regarding the southern rail connection proposed for the ICTF in North Charleston.

[REDACTED] is the owner of an office building located at that same address. It has two tenants, [REDACTED], a [REDACTED] in Charleston and [REDACTED], a [REDACTED]. The building was constructed as part of the City of Charleston's revitalization effort for the area. At the time of construction, it was located in an economic development zone that was promoted by The City of Charleston and the federal government.

[REDACTED] is concerned about the negative impact the southern rail connection will have on the upper Meeting Street Road corridor. The offices at [REDACTED] were conceived and developed along with its neighbor, [REDACTED], as an incubator for future office buildings and other nonindustrial uses. The proposed southern rail connection likely will run through the jointly shared parking lot with [REDACTED] and destroy the revitalization purpose of the real estate project, which has been in the making for over 10 years, long before the southern rail connection was even discussed.

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp. Of Engineers  
November 24, 2015  
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Contrary to the permittee's description of the area involving the southern rail connection as an "industrial area," there are many offices, non-profits and other buildings that would be impacted by this proposed southern connection. It will likely result in the closure and/or relocation of several offices.

Vehicular traffic is also a major concern. Interstate 26 is already overburdened, and the southern rail connection at its proposed location would create an additional crossing on the only secondary, multilane vehicular access up and down peninsular Charleston. With a track train speed limit of less than 10 miles an hour, longer duration train crossings and more frequent disruptions of vehicular traffic will occur. Long trains bound for the port currently proceed at well below 10 mph as they cross Meeting Street at an existing crossing to the south of the southern rail connection. These port bound trains often come to a dead stop and occupy the existing crossing for significant periods of time. There is no legally enforceable way to prevent similar long-duration occupations at an additional crossing on Meeting Street Road after it is permitted. With no practical, nearby traffic routing alternatives for the southern rail connection, such as at the other existing crossing, which happens to be located near an existing railroad right-of-way where a similar connection could be utilized, the southern rail connection will affect not just quality of life and the economic interests of businesses, but also raise fire, safety and security issues due to delayed response times inherent with a lack of alternative routes nearby.

Finally, we are concerned with a substantial increase in fumes, noise and vibrations caused by longer and more frequent intermodal trains and the potential of delays with switching activities at the southern rail connection. The offices at [REDACTED] were constructed next to railroad tracks that primarily carry short trains for local industries. Such short trains take relatively little time to pass by, utilizing fewer locomotives and minimizing vibrations. But they also occasionally stop and idle, emitting constant noise and noxious fumes. The trains proposed for the southern rail connection will stretch well over one mile in length with additional locomotives, taking more time to pass and resulting in more noise, vibrations and fumes. Additionally, there is no legally enforceable way to prevent such additional intermodal trains also from stopping and idling for hours, or to prevent them from increasing in length, weight and frequency of standby time during switching operations, well beyond levels currently proposed and after the

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp. Of Engineers  
November 24, 2015  
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permitting process is complete. Accordingly, we are concerned about the effects of increased vibrations, noise and fumes on the work of our tenants, ourselves, and future potential occupants, as well as the structure itself.

We appreciate your consideration of the above comments.

With kind regards, I remain





# City of Charleston

Joseph D. Riley, Jr.  
Mayor

November 25, 2015

Mr. Nathaniel Ball  
U.S. Army Corps of Engineers  
Regulatory Division  
69-A Hagood Avenue  
Charleston, SC 29403

RE: Palmetto Railways Navy Base Intermodal Facility: Public Notice Number SAC-2012-00960

Dear Mr. Ball:

The City of Charleston appreciates the opportunity to comment on the proposed Palmetto Railways Navy Base Intermodal Facility. The proposed project has a new southern loop which prompts significant concerns for the City of Charleston that I would like to share with you.

1) Mobility and Access Restrictions

A new at-grade rail crossing on Meeting Street will significantly impair movement in the entire City of Charleston as Meeting Street is a major north-south thoroughfare. Both emergency access and routine resident and business access will be compromised by the current southern loop alignment, and will result in heavy delays and unsafe blockages on a daily basis. Fire Station #9 is located on the corner of Heriot Street and King Street. The Fire Department has major concerns about its potential response times due to these blockages.

2) Property Impacts

The southern loop will affect the daily routine of residents and businesses in regards to access and noise, and could very well affect property values in a negative way. In a letter addressed to Ms. Tina Hadden dated September 8, 2015, Palmetto Railways describes the new southern CSX loop in the following way: "This alignment travels through an industrial area..." While the area has some existing industrial uses, it is witnessing significant mixed-use redevelopment and is zoned for a large amount of growth, density and a variety of urban uses. Significant private sector investments have been made in this area, many predicated on the current zoning designed to facilitate and encourage the area's transition from industrial to urban land uses.



P.O. Box 652, Charleston, South Carolina 29402

843-577-6970 Fax 843-720-3827

3) Public Service Operations Center Relocation

The City acquired approximately 16 acres of land north of Herbert Street for the construction of a new public service operations center for Police, Fire and Public Service after many years of negotiations. As currently shown on the plans for the project, the southern rail connection will extend through a portion of this site and affect the size of the operations center and access to/from the property. Since emergency access and daily access are critical to the public service operations center to enable the City to provide essential police, fire and public safety services to its residents, this location will be completely compromised and therefore will require relocation. Due to the potential impact of the southern rail connection on our site operations, the City has currently stopped the design and construction of a police maintenance facility to be built as part of the 16 acre operations center. This disruption in our project's timetable has pressed us to lease an alternative facility until resolution of this impact is determined.

4) Consent

South Carolina Code §57-5-820 provides that all work to be performed by the Department of Transportation on state highways within a municipality must be with the consent and approval of the proper municipal authorities. Given this statutory requirement and the fact that a portion of the Palmetto Railways Navy Base Intermodal Facility project is within the corporate limits of the City of Charleston, the City's approval is essential before any work on any state highway within the project area can commence. The City cannot approve this project until its concerns as set forth in this letter are satisfactorily addressed.

Given the vast detrimental impacts the southern loop alignment will have on the City of Charleston and in order to allow the City to be in a position to approve this project, we respectfully ask the Public Railways to continue to investigate other location options for the CSX connection. If the two rail connections can be consolidated into one access point, this change will dramatically reduce impacts to the City of Charleston.

Further, before the City can approve the project, the City would like the U.S. Army Corps of Engineers to encourage Palmetto Railways to evaluate critical impacts the southern loop alignment will have on affected areas in the City of Charleston by conducting impact studies, especially those impacts pertaining to traffic, noise, pollution, public safety and resident inconvenience cited herein.

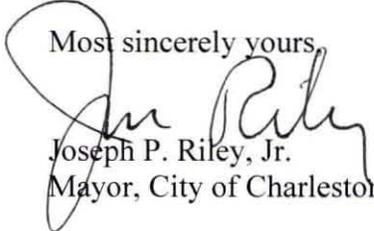
Alternatively, in the event a suitable new location cannot be identified for the southern rail loop, the City requests that the rail be modified to reduce the severity of its impacts by incorporating mitigation measures designed to help preserve and protect the areas in the City of Charleston and its residents who will be negatively impacted by the project. Mitigation measures could include:

Mr. Nathaniel Ball  
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- 1) The extension of Harmon Street to Cherry Hill Lane would create access for parcels which are circumscribed in the rail loop when trains are present.
- 2) The elevation of Meeting Street at the railroad crossing as a viaduct road would allow most emergency and routine vehicular access to continue uninterrupted.
- 3) The addition of at least two at-grade vehicular crossings over the existing rail corridor between King Street and Meeting Street would allow traffic flowing north the ability to use the King Street corridor should a train be blocking traffic at that location.
- 4) The arrangement of the Mount Pleasant Street/King Street/Meeting Street/Morrison Drive intersection could be reworked to allow for traffic to seamlessly move north on King Street.
- 5) King Street could be improved to accommodate the increased traffic demands and emergency access abilities of Fire Station #9 on Heriot Street that will otherwise be compromised.
- 6) The connection of Sewanee Road to the Port Access Road would ensure an access route to I-26 that otherwise will be taken away with the new rail crossing.
- 7) Provide acceptable replacement land for the City's Public Service Operations Center (and restitution for additional leased property) currently planned to be located on the City's parcel at Herbert and Harmon Streets.

If my staff can be of assistance to the search for alternative sites for the rail, please let me know. We are currently talking with Palmetto Railways regarding our public service yard and welcome the opportunity to meet with Palmetto Railways along with the U.S. Army Corps of Engineers to discuss our concerns, possible alternative sites and/or mitigation measures so we may all work together to ensure the success of our independent interests and grant the requisite statutory consent for the project to proceed.

Most sincerely yours,



Joseph P. Riley, Jr.  
Mayor, City of Charleston

cc: The Honorable Mayor-Elect John Tecklenburg  
The Honorable Councilmember Aubrey Alexander  
The Honorable Councilmember William Dudley Gregorie  
The Honorable Councilmember James Lewis, Jr.  
The Honorable Councilmember Robert M. Mitchell  
The Honorable Councilmember William A. Moody, Jr.  
The Honorable Councilmember Dean C. Riegel  
The Honorable Councilmember Michael S. Seekings  
The Honorable Councilmember Marvin D. Wagner

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The Honorable Councilmember Perry K. Waring  
The Honorable Councilmember F. Gary White, Jr.  
The Honorable Councilmember Rodney Williams  
The Honorable Councilmember Kathleen G. Wilson  
The Honorable Councilmember-Elect Peter Shahid  
Jeffrey McWhorter, President & CEO of Palmetto Railways

November 25, 2015

US Army Corps of Engineers  
Charleston District  
C/o Nathaniel (Nat) I. Ball  
Special Projects Branch  
69-A Hagood Avenue  
Charleston, South Carolina 29403

Re: Public Notice Number SAC-2012-00960

Dear Mr. Ball (Nat):

This is in response to your request for relevant, focused input from stakeholders on the scope of the proposed construction and operation of the Intermodal Container Transfer Facility (ICTF) located on the former Charleston Naval Complex (CNC) in North Charleston, South Carolina including identification of a range of reasonable alternatives and environmental issues the Corps should analyze. I thank you for allowing me the opportunity to inform you of the impacts that will affect my constituents.

For the past five years, the citizens of North Charleston have sacrificed their time to participate in federal, state and local ICTF public engagement processes and provide oral or written comments during the SC Legislative Review and Oversight Commission Public Hearings, the November 14, 2013 and October 27, 2015 Army Corps of Engineer's Public Scoping Meeting and Open Houses. As a result, I have summarized the following list of potential environmental impacts and request the Corps continue to work with community residents and city officials throughout the development of the Draft Environmental Impact Statement (EIS). We hope that the Corps will do right by the citizens of North Charleston in its determination of the elements of the EIS analysis and just mitigation measures.

With the most recent changes to the ICTF, additional wetland impacts and rail routing we feel that the assessment of impacts from the development should be extend east to west from the Ashley to the Cooper Rivers and from south to north from the southern city limits to Ashley Phosphate Rd.

**Truck Traffic/Safe Routes to School**

According to past data provided by the SCSPA, approximately 23% of the containerized cargo from the North Charleston Port Terminal would likely go to existing intermodal rail yards. The SCSPA estimates that for year 2025, approximately 100,000 additional containers per year or 600 containers per day would be delivered to the existing CSX and Norfolk Southern (NS) intermodal facilities in North Charleston. The additional container volume would likely require both CSX and NS on average to add two trains per day to handle the increased traffic. Trains are built in Charleston and are carried

to large intermodal railyards such as Atlanta, Jacksonville, or Charlotte. Since there are a limited number of train slots, intermodal trains may get longer in the future to accommodate increase in containerized cargo. Accordingly, there would be a total delay of approximately 9 minutes for the first vehicle in line for the at-grade crossing. Four at-grade rail crossings would be impacted by the increased number of trains per day for the increased intermodal rail freight resulting from the operation of the Proposed Project. The NS railway at-grade crossings at Taylor Street and Remount Road, both west of I-26 and north of I-526, would experience two additional trains per day and therefore would be blocked for an additional 18 minutes per day, 9 minutes per train, while the trains pass through the at-grade crossings. Two at-grade rail crossings for trains transporting intermodal freight on the CSX line would be impacted within the transportation study area. The CSX trains traveling north from east Bennett Yard would affect the at-grade crossings at Montague Avenue and Remount Road within the transportation study area. Additional NS at-grade crossings north of the transportation study area that would be impacted by the two additional trains per day are located at Aviation Avenue, Jet Park Road, Midland Park Road, and Ashley Phosphate Road.

The proposed ICTF will undoubtedly result in a heavy increase in both train and truck traffic. This increased traffic poses a safety hazard for local residents, the majority of who travel by bike or on foot. It is estimated that some housing developments will feel the effects of traffic ten folds, as they are cut off from road access by the proposed train tracks. Residents in these areas could easily be isolated from emergency and delivery services and other community resources if a train or other vehicle is blocking access to their homes. The City is proposing that the Corps evaluate the negative economic and emergency management impacts resulting from blocking crossings for an additional 18 minutes per day. The study's traffic model should reflect the reduction of capacity on adjacent arterials at peak hour at the blocked crossings and nearby intersections when vehicles detour to avoid waiting. The study should analyze conditions around institutional areas (schools, places of worship, libraries, etc.) and other activities to improve safety and accessibility, and reduce pedestrian/vehicular/truck/rail traffic conflicts.

### **Wetland Fill & Water Quality**

Based on the available information, the proposed project will result in the placement of fill material in waters of the U.S. and/or tidal marsh on the intermodal facility site and the offsite improvements. The Corps has published a Notice of Intent in the Federal Register on October 23, 2013. The project proposal indicates that fill material will be placed in waters of the United States and tidally influenced wetlands (approximately six acres), including Noisette and Shipyard Creeks.

In 2008, EPA and the U.S. Army Corps of Engineers jointly promulgated regulations revising and clarifying requirements regarding compensatory mitigation. Compensatory mitigation refers to the restoration, establishment, enhancement, and/or preservation of wetlands, streams, or other aquatic resources conducted specifically for the purpose of offsetting authorized impacts to these resources.

The city requests that the Corps investigate the possibility of utilizing "permittee-responsible compensatory mitigation" (PRCM), the most traditional and popular method for carrying out mitigation projects. Under PRCM, the permittee has the responsibility to successfully complete any required mitigation projects, which can be located at or adjacent to the impact site or at another location generally within the same watershed. I request that the Corps choose a mitigation site in

the immediate vicinity of the ICTF project. Noisette Creek, Filbin Creek or Quitmann's Marsh are viable candidates for mitigation in that they are currently, listed as impaired watersheds in great need of restoration.

### **Pollution/Air Quality**

Diesel powered locomotives emit a number of pollutants including fine particulate matter (PM2.5), oxides of nitrogen (NOx), hydrocarbon (HC), carbon monoxide (CO), and compounds designated as hazardous air pollutants by the U.S. Environmental Protection Agency (EPA). Although more stringent federal standards will go into effect for locomotive engines over the next few years, in-use locomotives will continue to emit large amounts of pollution for the near future, absent further control measures. In addition, locomotive engines are under-regulated relative to other mobile sources of air pollution. I would urge the Corps to study a variety of cost-effective emissions control measures that would achieve significant reductions in this sector. The locomotive fleet in and around North Charleston includes line-haul freight and switch locomotives.

The City is proposing that the Corps include in its EIS study an assessment of reducing locomotive and switcher emissions by retiring and/or replacing pre-Tier 2 diesel locomotives with state-of-the-art emissions compliant locomotives, and replacing diesel locomotives with electric multiple-unit locomotives. SC Public Railways could also purchase hybrid switcher locomotives and use auto-shut off technologies to reduce emissions from switcher idling and to promote fuel efficiency. Strategies already in use by other states have reduced emissions by 40%. EPA has developed an emissions calculator to help truck carriers measure their particulate matter, NOx and CO2 and identify strategies to reduce harmful diesel emissions and track emissions performance on an annual basis. The Corps should analyze truck emission reductions if SC Public Railways instituted a truck replacement program that replaces older, dirtier trucks with cleaner, newer ones in an effort to reduce diesel pollution from port drayage trucks. Diesel pollution is linked to thousands of premature deaths, hundreds of thousands of asthma attacks and millions of lost workdays.

### **Right Whale Stations**

Right whales are the rarest of the large whales and the waters of the coast of South Carolina are deemed a "critical habitat" for right whale calving grounds. The critically endangered species sightings are dependent upon private reports. A shore-based volunteer network sighting station is located within the ICTF footprint. The Corps should investigate ICTF impacts to this station and propose alternative locations.

### **Cultural Sites**

I request that the Corps consider the project's impact on any community cultural facilities located within or in close proximity to the proposed ICTF, especially Sterrett Hall Recreation Center (located at the corner of 1530 7<sup>th</sup> Street and Hobson Avenue). Sterrett Hall is a cultural resource for the affected community, featuring a 960-seat auditorium, a large reception hall, offices, meeting rooms, and a gymnasium fitted with basketball goals and a weight room. It is an iconic cultural asset and a popular meeting place for local residents and one of the few safe locations in the area for community-sponsored and cultural events. Many residents have voiced their concerns regarding the destruction

of Sterrett Hall at numerous previous public meetings. The previous settlement with the States Port Authority did not account for the loss of these cultural assets.

Additionally, the revised ICTF plan has a northern component which traverses through the historically designated Naval Hospital District. Restoration of the Hospital is estimated to exceed \$25 million dollars. Mitigation of the loss of this historical asset could include contributions to the redevelopment of the Officers Housing Quarters and the Admirals House on the Former Base, including many of the most historic and architecturally important original structures on the Navy Base.

The existing railroad corridors slice through the area making developing physical, cultural, and economic connections to other areas difficult. The area would be further divided by the proposed ICTF that would be a barrier to green/open space such as the Riverfront Park and Noisette Creek. As Mr. Charles Masencup stated at the October 27 Scoping Meeting, "...some of the most beautiful land in the entire city' along the Cooper River will be cut off from the public if the (ICTF) plans are allowed to proceed."

#### **Noise & Vibration**

The proposed ICTF plans place multiple tracks of railway immediately adjacent to environmental justice populations (as determined by EPA EJ Screener). During the scoping meetings, a number of residents shared their deteriorated health conditions resulting from cumulative environmental stressors such as vibration, air, noise, and light pollution. In 2008, CSX conducted a noise study in response to residents' complaints of the Wando Woods and Green Grove neighborhoods (within 60' from the closest track to 340' of the farthest track). In response, CSX requested an evaluation of the sound of the rail yard operations, and noise mitigation measures. Train switching has been performed in the yard area south of Dorchester Road over the past 40 years, and has increased within the past few years to support the growth in shipping at the Port. Car coupling, locomotive bells and horns, and non-CSX related sources such as trucks, produced most of the noise spikes. The residents were most concern with noise and vibration associated with switching activity during both nighttime and daytime periods and noticed that switcher locomotives were noisier than regular locomotives. The impact noise during switching was of the greatest concern and the transport of wet pulp produce, from paper manufacturing, was attributed to the greatest levels of vibration. I request that the Corps investigate:

1. The expansion of the project area to that bounded by the Ashley River, Cooper River and Ashley Phosphate Road;
2. The condition of the direct, indirect and cumulative impacts of existing rail, ballast, and railroad ties to reduce vibrations associated with train movements both on and off-site;
3. Analyze the train speeds throughout the ICTF project area and adjacent intermodal yards to reinforce compliance with the non-mainline and mainline speed limits; and,
4. Minimizing train speeds during the switching operation to minimize coupling impact noise.
5. The establishment of enforceable Quiet Zone along all at grade crossings within the City Limits.

SC Public Railways should establish a noise buffer area and noise barriers (such as earth berms) within 500' of the ICTF and its feeder rail lines to provide noticeable reductions in various switching operation sounds to the nearest residences. The current buffer is proposed to be 100' from the ICTF which I feel is inadequate to mitigate the effects of the new industrial development adjacent to the residential communities. To be effective, the barrier wall would need to be solid, contain no significant openings, be of sufficient mass, and extend in height and length to block the line-of-sight from the train locations to the residences. The wall(s) should also include space for adequate clearance and proper foundation and structure in order to withstand expected wind loads. The line-of-sight between the ICTF to the receiver should be effectively broken.

To accomplish even the 100' buffer, SC Public Railways would need to acquire a number of residential properties along the western boundary of the site which would disrupt neighborhood cohesion. In some instances it would require taking more than half of the homes on a given street. To mitigate this effect I propose that SC Public Railways acquire all of the residential property adjacent the proposed ICTF out to Spruill Avenue.

Additionally, the Corps should analyze ground vibration associated with direct, indirect and cumulative train movements. Although some vibrations may not be felt on the ground during testing or be of high enough magnitude to register as a threat to structural stability of existing buildings, many residents, especially those with older homes will notice that their windows and doors are effected by the vibration from rail transport. Although minor vibrations may not impact the community from a building stability standpoint, these nuisance vibrations can be most disruptive to the community's life, especially in the overnight hours.

### **Social Impact Assessment/Neighborhood Cohesion**

The City of North Charleston's motto is a great place to live, work and play. Unfortunately, the development of the ICTF will alter the ways in the adjacent EJ community lives, works, and plays, relate to one another, and generally cope as members of the city. The Corps should investigate the social consequences that are likely to follow from the ICTF project development. The surrounding EJ community has specific environmental justice concerns, and as such, enhanced analysis efforts require the development of more advanced analytical methodologies and extensive and targeted engagement of residents. Such factors include identifying unique exposure pathways, assessing physical infrastructure conflicts, and as noted previously, multiple stressors resulting from cumulative impacts.

The LAMC Neighborhood Revitalization Plan and the Neck Area Master Plan were both completed within recent years. The plans include research, analysis and recommendations for addressing a host of issues that affect this community. The cumulative effects of industries that have located near the LAMC study area over the last 50 years have dramatically affected the overall quality of life. Heavy industrial uses in close proximity to residential uses are viewed negatively by residential developers and homeowners. Natural disasters such as the recent floods have also played a role in the decline of property values. The LAMC study area is particularly at risk because of existing floodplains in the area and the pervasive need for drainage improvements. The Corps should investigate the indirect, direct and cumulative flooding risks such as impacts on the elevations within the floodplain, retention/detention and water quality calculations and upstream/downstream flooding problems to

the safety and welfare of the public and the potential damage to public and private property and the cost of building construction. The elimination of wetland assets may exasperate this condition as well. To date the City has not seen or been presented with a comprehensive drainage plan for the ITCF.

**Alternatives Analysis**

The new plan for the ITCF has rail running both out of the north and south ends of the former CNC thus impacting a greater swath of the City than previously proposed. The southern route which connects to the Central Rail Corridor, was proposed by the City during the first discussions of this project and it appears that SC Public Railways is moving toward that solution. An alternative analysis that investigates the impacts of sending both rail carrier to the south or both lines to the north should be compared to assess the cumulative impact of the expansion of this project scope.

Additionally, SC Public Railways proposes to construct a southern line through 10 distinct properties in the City of Charleston to establish an east/west connection to the central rail corridor. The existing east/west connection is jointly owned by NS and CSX and would require the acquisition of only 1 or 2 properties in the "Neck" and utilize existing rail which is underutilized now. A project of this magnitude should be used to consolidate rail line usage and impacts not to expand them.

Furthermore, the original Alternative Analysis was restricted to properties which were owned by the SC Public Railways, thus eliminating the former Macalloy Site from consideration. With the current changes bringing additional impacts to the south, would it be appropriate time to look at alternate sites including the former Macalloy site. The City has always believed that a southern route from the Macalloy site was always the best option to minimize impacts to the public and to the environment. I request that the Corp to require an assessment of this alternative.

I request that the Corps carefully consider all direct, indirect and cumulative negative environmental, cultural and historical impacts that will affect the citizens living in the ICTF project impact area with emphasis on those outlined above.

If additional information is needed or you have any questions, please contact my office. Thank you for the oppportunity to submit comments

Sincerely,



R. Keith Summey  
Mayor

Cc: Ray Anderson  
Wannetta Mallette  
Adam MacConnell

PRESERVATION  
ESTD SOCIETY 1920  
of CHARLESTON

November 24, 2015

US Army Corps of Engineers  
Regulatory Division  
Attn: Mr. Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403

Re: *Proposed Construction and Operation of an Intermodal Container Transfer Facility (ICTF) at the Charleston Navy Complex (CNC)*

Dear Mr. Ball:

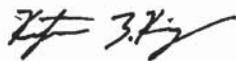
Thanks to the Army Corps of Engineers (the Corps) and Palmetto Railways for organizing the public scoping meeting on October 27, 2015 regarding the referenced undertaking. The meeting was informative and provided a greater understanding of some of the community's concerns. During the public comment period, we would like to offer our comments on the referenced undertaking. In addition, the Preservation Society (PSC) is hereby requesting consulting party status in the Section 106 review for the referenced undertaking.

As you are well aware, the proposed construction and operation of an ICTF at the CNC requires the construction of a rail line which will intersect the Charleston Naval Hospital Historic District (the District), a National Register Historic District important for its national significance. The District lies just to the west of both the Charleston Navy Yard Historic District and the Charleston Navy Yard Officers' Quarters Historic District, also listed on the National Register of Historic Places at the national level of significance. In total, thirty-two structures from two eras of development, World War I and leading up to and through World War II, are listed as contributing to the District and can be categorized in three groups: healthcare facilities located at the main hospital complex, service-related buildings located to the east of the main hospital, and residential buildings mostly to the south and west of the hospital. These contributing structures represent a cohesive district with a high degree of integrity.

In 2011, the District and the two adjacent historic districts became a focal point of PSC's *Seven to Save* program, which helps preserve vulnerable historic and cultural resources through education and public awareness. We have serious concerns about the proposed path for the rail line, as it requires the demolition of some contributing structures and will directly impact many others. This diminution of the integrity of the District, which serves as an important cultural resource, will be a considerable detriment to the human environment on and around the CNC.

As the Corps prepares its EIS, we ask that you consider our comments. In addition, when appropriate, please provide notice confirming our consulting party status, as well as notice of the commencement of the Section 106 process.

Sincerely,



Kristopher B. King  
Executive Director



HISTORIC CHARLESTON  
FOUNDATION

Lt. Col. Matthew Luzzato  
Commander and District Engineer,  
Charleston District, U.S. Army Corps of Engineers  
69-A Hagood Avenue  
Charleston, SC 29403

Mr. Nat Ball  
Charleston District, U.S. Army Corps of Engineers  
69-A Hagood Avenue  
Charleston, SC 29403

**Re: Navy Base Intermodal Transfer Facility**

Lt. Col. Luzzato and Mr. Ball:

Historic Charleston Foundation is deeply concerned by the proposed Navy Base Intermodal Transfer Facility project. The proposed project threatens to demolish a significant portion of the Charleston Naval Hospital Historic District, which would result in an irreparable loss of the District's integrity. The proposed project would also inflict adverse effects upon two additional National Register Historic Districts, the Charleston Navy Yard Officer's Quarters Historic District and the Charleston Navy Yard Historic District. The project further proposes to demolish a significant number of private residences and permanently degrade the quality of life for a significant number of North Charleston's citizens. This scale of damage is simply unacceptable; a better alternative than the proposed project must exist.

The Corps is required by NEPA to consider "[t]he degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources."<sup>1</sup> Corps regulations further reinforce the need to consider historic properties in the Section 10 permitting process, requiring the Corps as part of "public interest review" consider "...probable impacts, including cumulative impacts" to "...historic properties."<sup>2</sup> Corps regulations require that when permitting actions the Corps seek to avoid adverse effects upon historic properties:

*Full evaluation of the general public interest requires that due consideration be given to the effect which the proposed structure or activity may have on values such as those associated with...historic properties and National Landmarks....and such other areas as may be established under federal or state law for similar and*

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<sup>1</sup> 40 C.F.R. § 1508.27(8)

<sup>2</sup> 33 C.F.R. 320.4(a)(1)

*related purposes....[A]ction on permit applications should, insofar as possible, be consistent with, and avoid significant adverse effects on the values or purposes for which those classifications, controls, or policies were established.*<sup>3</sup>

The Corps is also encouraged by the NHPA "...to coordinate compliance with section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their section 106 responsibilities as early as possible in the NEPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner."<sup>4</sup> Historic Charleston Foundation eagerly awaits the initiation of the Section 106 review process in connection with the proposed Navy Base Intermodal Transfer Facility project, and we formally request to be involved as a consulting party.

Pursuant to the current NEPA public scoping process, Historic Charleston Foundation comments that the proposed project will have significant adverse effects upon both the human environment and upon three historic districts listed on the National Register of Historic Places. Most severe will be the effect upon the Charleston Naval Hospital Historic District.<sup>5</sup> The following is a list of contributing buildings to the Charleston Naval Hospital Historic District that the proposed project plans to demolish:<sup>6</sup>

1. **1463 Avenue H (Building 762/ Building P-2)**  
Ca. 1937 two story single-family residence built as housing for pharmacy officers.
2. **1451 Avenue H (Building 763/ Building P-1)**  
Ca. 1937 two story single-family residence built as housing for pharmacy officers.
3. **1350 Avenue H (Building KK-JJ)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.
4. **1293 Avenue H (Building DD-EE)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.

The Navy Base Intermodal Transfer Facility project proposes to run rail lines on a path directly through these buildings, necessitating their demolition. The proposed rail

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<sup>3</sup> 33 C.F.R. 320.4(e)

<sup>4</sup> C.F.R. § 800.8(a)(1)

<sup>5</sup> Maps are attached to this letter that show the boundary of the Charleston Naval Hospital Historic District, the proposed project's path through the district, and contributing buildings in the district that will be adversely affected.

<sup>6</sup> All building names, descriptions, and designations are from the National Register of Historic Places, Charleston Naval Hospital Historic District, North Charleston, Charleston County, South Carolina, National Register #10000851.

lines will also pass within a few feet of the feet of the following buildings, all contributors to the Charleston Naval Hospital Historic District:

1. **1795 Avenue F (Building 758/Building NH65)**  
Ca. 1942 home of the Commanding Officer of the Naval Hospital.
2. **1801 Avenue F (Building 759/Building NH64)**  
Ca. 1942 medical officer's quarters.
3. **1849 Avenue F (Building 760/Quarters 2)**  
Ca. 1917 dwelling.
4. **1804 Marine Avenue (Building M-5)**  
Ca. 1942 residence for naval officers.
5. **1761 & 1775 Commissary Street (Building M6-M7)**  
Ca. 1942 duplex dwelling.
6. **1304 Avenue H (Building II-HH)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.
7. **1288 Avenue H (Building FF-GG)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.
8. **1345 Avenue G (Building LL-AA/ Building D-AA)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.
9. **1311 Avenue G (Building BB-CC)**  
Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.
10. **1690 Turnbull Avenue (NH45)**  
Ca. 1940-1942 Hospital Administrative Building, centerpiece of the main hospital complex.
11. **1690 Avenue H (NH46)**  
Ca. 1940-1942 Subsistence Building, part of the main hospital complex.
12. **1420 Avenue H (NH48)**  
Ca. 1940-1942 Sick Officer's Quarters, part of the main hospital complex.
13. **2335 Avenue F (NH49)**  
Ca. 1940-1942 Genito-Urinary Ward, part of the main hospital complex.

14. **1450 Avenue H (NH50)**  
Ca. 1940-1942 Medical Ward, part of the main hospital complex.
15. **1460 Avenue H (NH52)**  
Ca. 1940-1942 Neuro-Psychiatric Ward, part of the main hospital complex.
16. **1470 Avenue H (NH54)**  
Ca. 1940-1942 Contagious Ward, part of the main hospital complex.
17. **2325 Avenue F (NH47)**  
Ca. 1940-1942 Surgical Ward and Emergency Room, part of the main hospital complex.
18. **2335 Avenue F (NH49)**  
Ca. 1940-1942 EENT Ward and Dental Offices, part of the main hospital complex.
19. **2365 Avenue F (NH53)**  
Ca. 1940-1942 Dependents Ward, part of the main hospital complex.

These nineteen buildings are in close proximity to the proposed rail lines and will suffer direct adverse effects from the proposed project. Those that are not partially or wholly demolished during construction will be isolated from each other and subjected to vibrations from trains that will hasten their degradation. Train noise and inaccessibility caused by the rail lines will permanently preclude market-driven adaptive reuse of these buildings, dooming them to be left to demolition by neglect. In total, if the proposed plan is permitted, there will be severe direct adverse effects to 23 out of the Charleston Naval Hospital Historic District's 32 contributing structures.

This scale of this adverse effect will compromise the integrity of the Charleston Naval Hospital Historic District to the point where it could be de-listed from the National Register. The significance of the Charleston Naval Hospital Historic District is derived from the facility in its totality rather than a collection of individual sites. The Naval Hospital was strikingly modern when it was built and represented multiple advancements in medicine and in the organization of the Navy's medical services that are reflected in the layout of the facility:

*"The new hospital was modern in every way. Its plan provided different medical specialties with their own distinct sections of the complex, a centralized subsistence building, a consolidated administration building and a central courtyard providing a recreation area and plenty of natural light to all areas of the buildings. The hospital provided state of the art equipment for all fields, including an operating suite, an x-ray department, and spaces and equipment for the emerging field of physiotherapy and rehabilitation."*

These advancements in medical care contributed to the United States' victory in World War II, and the Charleston Naval Hospital Historic District was listed on the National Register in recognition of the importance of these advancements. The demolition and isolation of buildings that represent these advancements will destroy their ability to communicate this significance. The loss of the association between the buildings represents a fatal adverse effect to the District.

NEPA, the NHPA, and Corps regulations contain a mélange of provisions requiring that prior to permitting a proposed action that will result in adverse effects to historic properties alternatives must be considered. Historic Charleston Foundation hereby requests that alternatives to the proposed project be studied and considered prior to its permitting by the Corps. Any project that proposes to destroy the integrity of a National Register Historic District simply cannot be the best option. Previous alternative routes have been proposed and withdrawn for reasons that do not weigh equally in gravity to the destruction of a National Register Historic District. Numerous tragic examples exist of the destruction of our nation's cultural heritage for the sake of economic gains that proved to be temporary and regrettable. Please do not allow the Charleston Naval Hospital Historic District to fall victim to short-sightedness.

The proposed project will also result in adverse effects to the Charleston Navy Yard Historic District and the Charleston Navy Yard Officer's Quarters Historic District. Historic Charleston Foundation acknowledges that when all alternatives are evaluated, it may well be that providing rail service to the proposed intermodal facility necessitates the infliction of adverse effects upon the Charleston Navy Yard Historic District and the Charleston Navy Yard Officer's Quarters Historic District. Inevitabilities of this nature are why mitigation procedures and requirements exist under both the NEPA and NHPA, and we look forward to the opportunity to discuss potential mitigation strategies for the adverse effects to these districts with the Corps and the permit applicant.

The adverse effects caused by this project to the human environment are no less of a concern to Historic Charleston Foundation than the effects upon historic resources. We urge the Corps to listen to the many people who will have their quality of life significantly harmed by the permitting of this project as presently designed. Well thought out plans to create thriving communities in and around the Navy Base have been put forth in recent years, clearly demonstrating the market's intentions for the site absent the interference of the proposed project. We know that the permit applicant has made great efforts to reach out to the community; we hope that they will also make great efforts to ensure that the area that they propose to adversely affect is able to survive and flourish after the completion of their project.

In summary, Historic Charleston Foundation strongly urges the Corps not to allow the destruction of the Charleston Naval Hospital Historic District via the permitting of the proposed project. We eagerly await the initiation of the Section 106 process in connection with the proposed project and reiterate our desire to be included as a consulting party. We also wish the Corps to consider the adverse effects the proposed project would inflict upon the Charleston Navy Yard Officer's Quarters Historic District and the Charleston Navy Yard Historic District. If these adverse effects should prove inevitable, we look forward to working with the permit applicant and the Corps towards

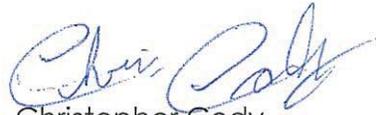
equitable mitigation. We finally ask that the Corps thoroughly and thoughtfully consider the concerns of the many neighbors who will be directly affected by the proposed project.

We thank you for your time and consideration in this matter.

Very Truly Yours,



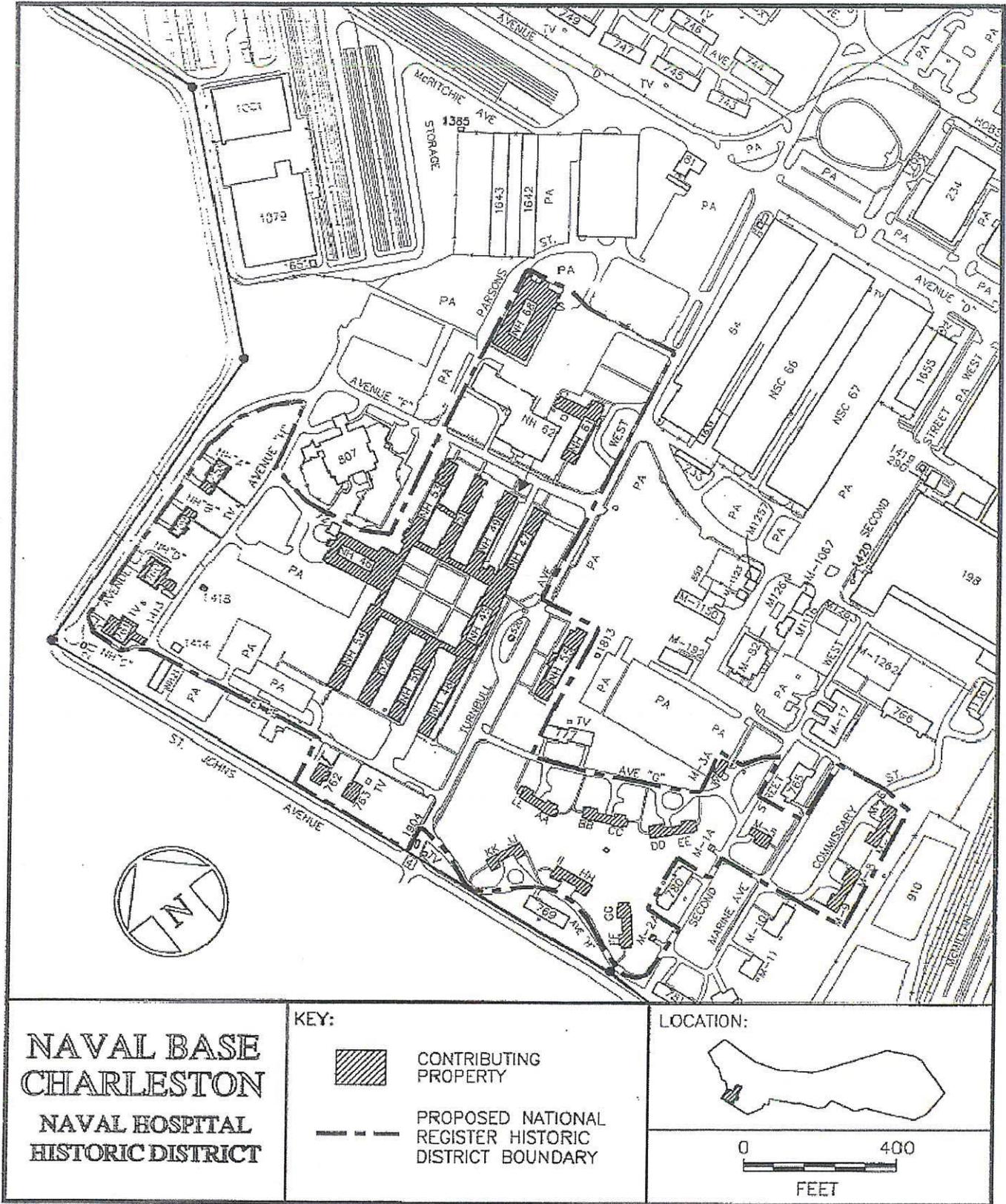
Winslow Hastie  
Chief Preservation Officer



Christopher Cody  
Manager of Advocacy

Cc: Dr. Eric Emerson, South Carolina SHPO

# Maps of Charleston Naval Hospital Historic District and the proposed Navy Yard Intermodal Facility Project



Map of Charleston Naval Hospital Historic District (Source: National Register of Historic Places Nomination, Charleston Naval Hospital Historic District, North Charleston, Charleston County, South Carolina, National Register #10000851)

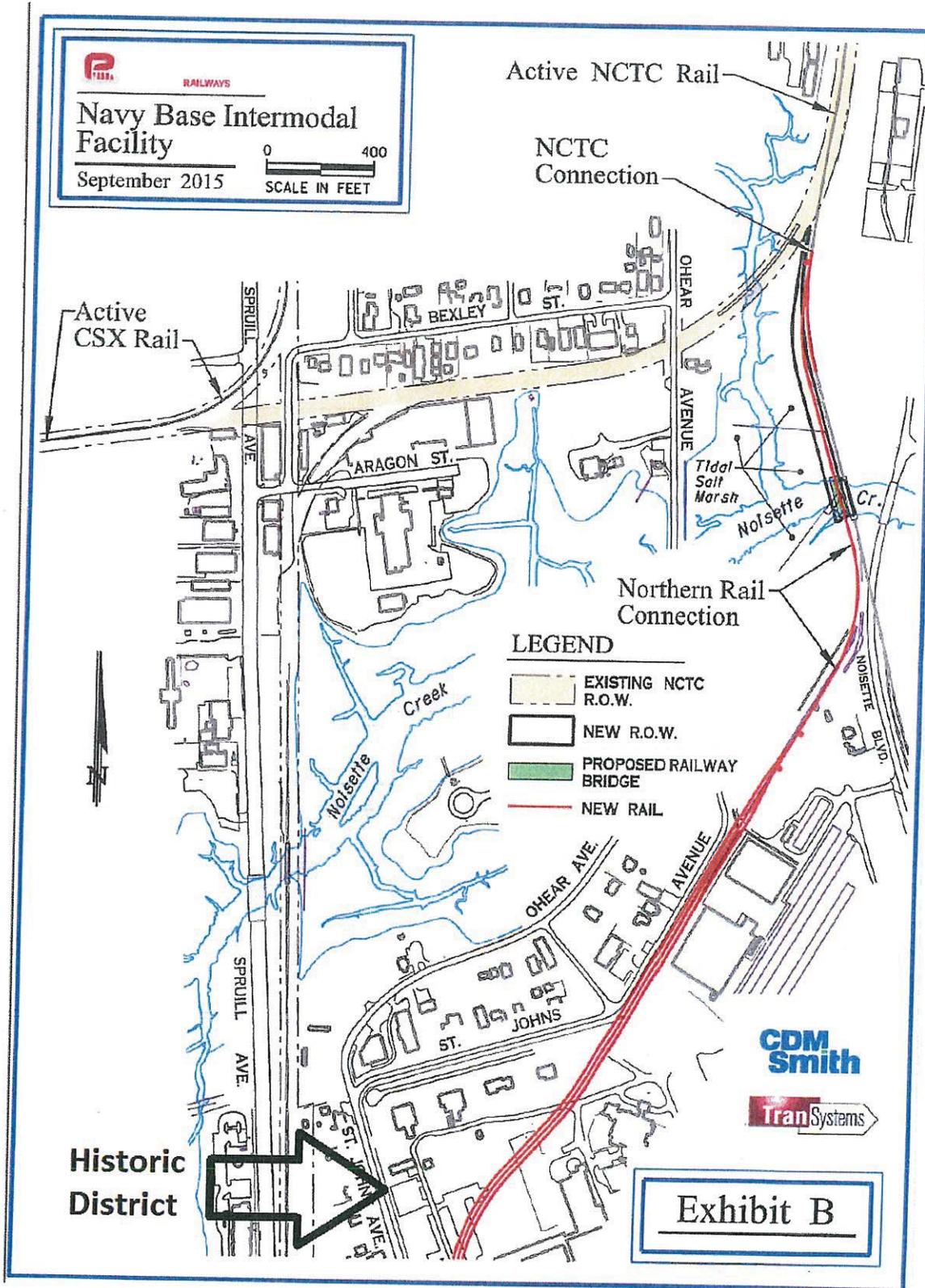


Exhibit B of Navy Base Intermodal Facility Drawings, September 2015 (Source: <http://www.navybaseictf.com>) Historic District area identification added.

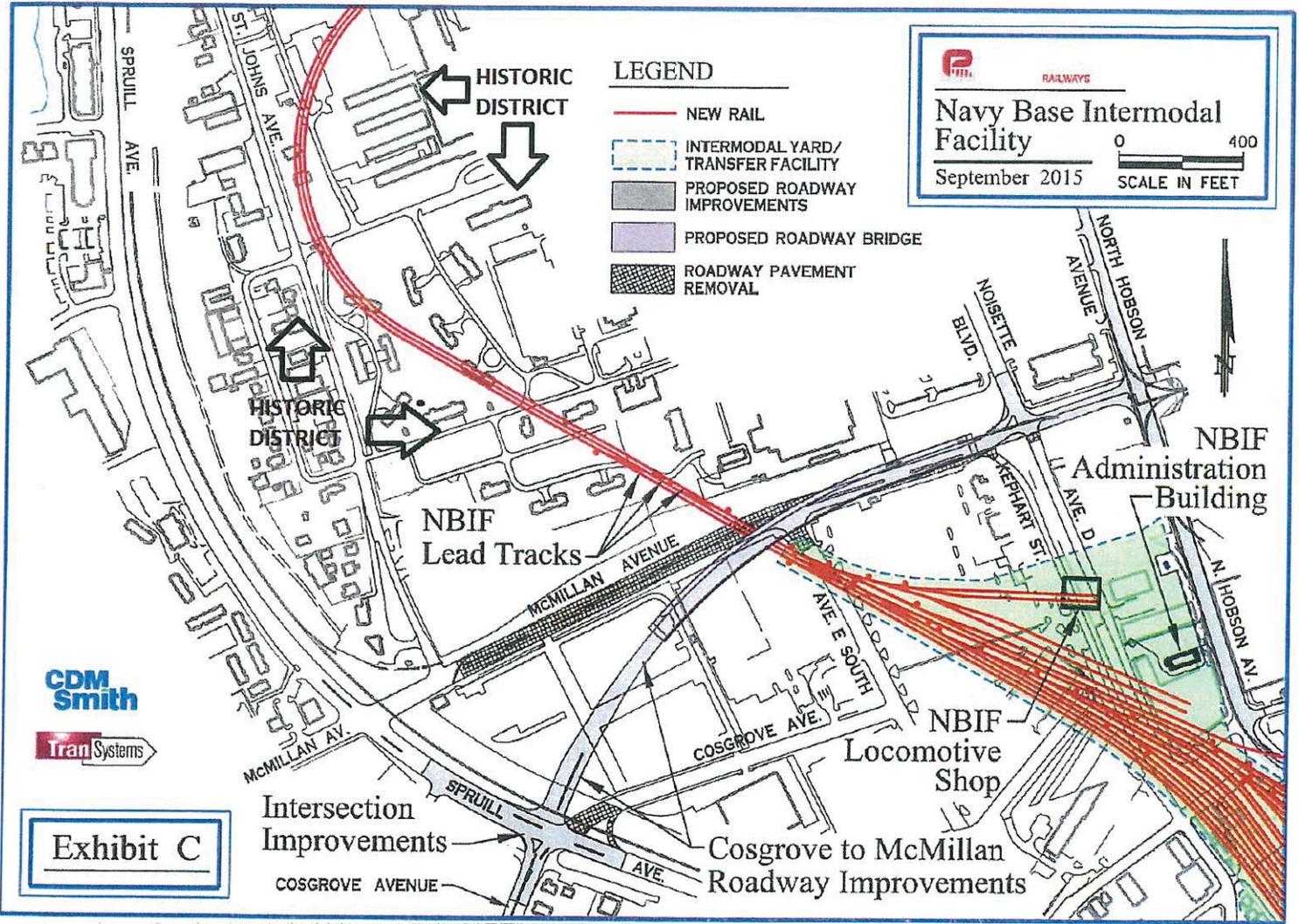
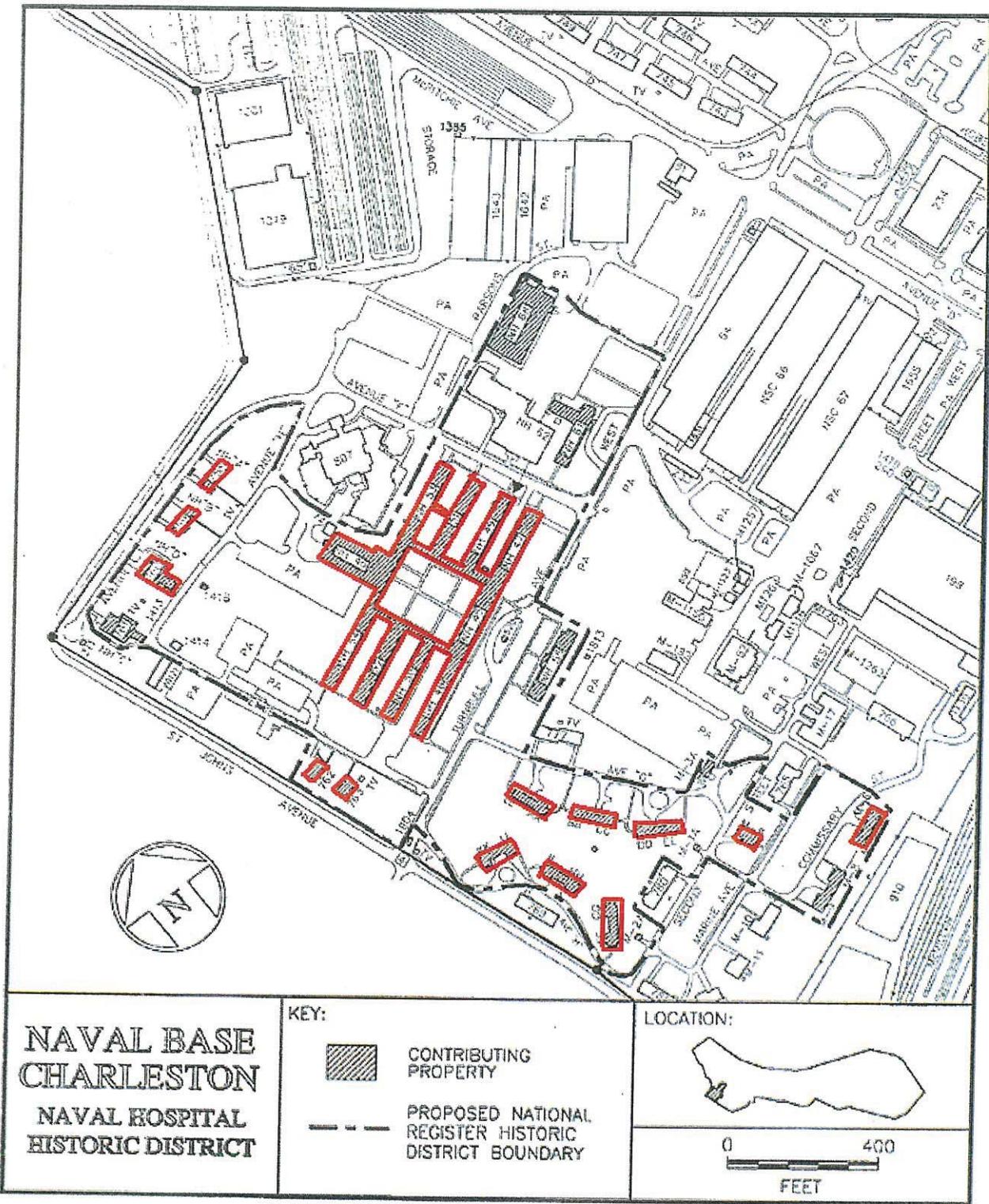


Exhibit C of Navy Base Intermodal Facility Drawings, September 2015 (Source: <http://www.navybaseictf.com>) Historic District area identification added.



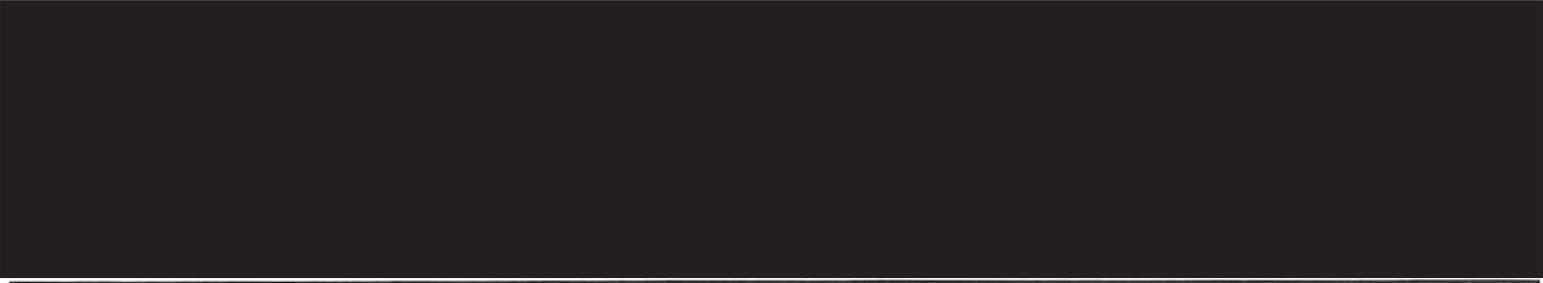
Map of Charleston Naval Hospital Historic District with contributing structures that will be in the path of or directly adjacent to proposed project outlined in red. (Source: National Register of Historic Places Nomination, Charleston Naval Hospital Historic District, North Charleston, Charleston County, South Carolina, National Register #10000851)

10/26/2015

Mr. Nathaniel Ball

My name is [REDACTED] and I am the owner of a small business, [REDACTED] located [REDACTED]. I am writing you today to express my concerns in regards to the Southern Rain Connection that is being proposed near my business. This addition rail line will cause extra burden onto my business and the folks living in the community. There is all ready one railroad crossing on Meeting Street and Cherry Hill Lane literally feet from my building. This crossing causes traffic to stop in front of my building and backs ups preventing people from entering or leaving my property. This traffic stoppage can take up to thirty minutes at a time. Numerous times over the years I have had freight shipments delayed because delivery trucks could not access my building. It also prevents people from leaving or entering Four Mile Lane, a small residential street next to my property. There are several elderly folks living on Four Mile lane and these traffic blockages caused by rail traffic will prevent emergency responders from being able to serve these folks should the need arise. Also there is the impact on property values to the area. I have worked my entire adult life to build my business and I refuse to see it cheapened by the intrusion of more loud, rusty, graffiti covered rail cars. This area is becoming a hub for young entrepreneurs who are turning it from a blighted eye sore to a destination. I believe it is the job of the Army Corp of Engineers to look out for the best interest of the local community and business owners rather than bend to the demands of a faceless corporation as the next railroad might be in your back yard.

Sincerely,



November 17, 2015

U. S. Army Corps of Engineers  
Charleston District  
Attn: Nathaniel I. Ball, Special Projects Branch  
69-A Hagood Avenue  
Charleston, SC 29403

Re: Proposed Navy Base Intermodal Transfer Facility – Public Notice No. SAC-2012-00960

Dear Sir:

Although I support a state-of-the-art intermodal hub serving the Port of Charleston, I am deeply concerned about the Southern Rail Connection.

My company's terminal access is via Herbert Street, which already is hindered by existing crossings. The addition of new rail right-of-ways and at-grade crossings will certainly be detrimental to our operation. We have permanent tenants and per project occupants at our facility who depend upon convenient, safe, 24-hour access to Shipyard Creek. This past year we had over 150 employees of various dredging contractors parking and working out of our yard. The possibility of trains blocking access to or from the terminal not only poses a safety risk, but also devalues our property in terms of one of its highest and best uses.

I urge you to review the Southern Rail Connection as proposed, and to deny it, unless alternate routing can be found which guaranties unimpeded access to the businesses in the Southern Rail Connection corridor.

Very truly yours,



I am writing to voice serious misgivings about the proposed plans for the Intermodal Container Transfer Facility (ICTF) which is being considered for the City of North Charleston. My concerns fall into three main categories: lack of dialogue with and respect for residents, pollution related to the ICTF and associated rail traffic (noise and air), and cutting residents off from current and future access to and enjoyment of waterfront lands in North Charleston.

The City of North Charleston has an undeniable history of supporting industry and commerce. At the same time, the city has a motto which states that North Charleston is striving to be a "great place to live, work, and play." The fulfillment of this motto requires a delicate balance between opportunities for industry and quality of life. The city has done a commendable job of being mindful of that balance—growing industry and opportunity for industry while simultaneously pursuing green space, attractive and affordable housing, cultural and recreational opportunities, and diversity. Our family moved to the Park Circle area of North Charleston in 2010, and we truly have found North Charleston a great place live, work, and play. We appreciate the community feel of our neighborhoods, the opportunities to be involved in the community, and the ability to walk our kids to school and live a few miles from my husband's work. This is an environmentally responsible way to live as well as a healthy lifestyle for our family. This community is (unfortunately) unique in the Charleston area, as it is difficult to find places where residents can enjoy a high quality of life near their jobs. Neighborhoods like this should be encouraged and supported. They are good for the environment and good for building strong communities.

The plans for the ICTF are threatening this delicate balance that the City of North Charleston is striving to achieve and maintain. Thus far, it is obvious that the economic impact of the proposed facility and railroads has been considered and there are many who stand to profit from this venture. However, now another "E"—the *environmental* impact, not solely the *economic* impact—must be considered, and this needs to include the quality of life that North Charleston is striving for. The fact that the city has opposed many facets of this facility is notable, considering that it is coming from a city which works hard to encourage economic growth and opportunity. The residents of North Charleston, while far from resenting the industry that thrives in their city, feel taken advantage of in the underhanded proceedings surrounding the plans for the new port and the ICTF. The current plans for the port, ICTF, and rail traffic are drastically different from what residents relied on when first accepting the idea of the new port being located in their city.

If the ICTF plans are carried out as proposed, residents of North Charleston will be faced with increased rail traffic along with accompanying noise, pollution, and loss of aesthetics and opportunities. For the sake of the residents who would be forced to bear the burden of these new facilities, the following three concerns need to be addressed by the environmental impact study:

**1. Communication and dialogue:** Residents should have an opportunity to *dialogue* (in contrast to a monologue, as was pointed out at the last public meeting) with those in charge of the planning for both the port, the ICTF, and the railways. Since residents are being asked to shoulder the negative impacts of the new facilities, they should have the opportunity to meet with those who benefit financially from these facilities. I believe the financial stakeholders should be willing (required, if not willing) to talk face-

to-face with those who live, work, breath, and raise families in close proximity to their business ventures. This will go a long way toward improving local perception of the facilities. It is by no means a new concept that a business venture entering a community should work to include the community members and ensure that they are valued and listened to. This has not happened yet in this project, and it needs to occur. The last public scoping meeting I attended had the feeling of a legal formality rather than a real opportunity to listen to the community. Other industries that have come into the area have demonstrated the willingness to show concern for residents and have thus been well-received. One particular business near our house has sent representatives to our neighborhood meetings, sent out e-mails letting residents know about issues that may affect them, and set up a community relations panel that holds regular meetings at which members of the community can receive updates and voice complaints.

**2. Ongoing pollution—both noise and air quality:** The amount of increased noise and air pollution likely to be generated by the ICTF and the associated rail traffic needs to be studied along with its environmental and health impacts. The findings need to be thoroughly and promptly reported to the community and steps taken to mitigate them both in the planning stages *and going forward into the future*, as the amount and effects of noise and air pollution could significantly change over the life of the ICTF.

**3. Access to current waterfront parks as well as river access in general:** The environmental impact study needs to carefully assess how the plans for rail exiting the ICTF affect residents' ability to access and enjoy the waterfront of North Charleston both now and in the future. The current proposal for the ICTF, which calls for train traffic extending for miles north along the river, would cut off the residents of North Charleston from access to the river. North Charleston's extensive riverfront should be enjoyed as one of the city's greatest assets, just as it is in other areas. For example, on the nearby peninsula of Daniel Island (the original site of the planned port), quiet boardwalks and parks line the rivers and marshes. Leading industrial cities across the nation have been realizing the immense impact that a human-focused waterfront can have on their communities. These cities have been reclaiming their waterfronts and experiencing the economic goldmine of an aesthetically-developed waterfront. The residents of North Charleston, in accepting a facility that will benefit individuals outside of the community financially, should not be denied access to one of their greatest natural resources. The two places that now exist for residents to enjoy the waterfront are Riverfront Park, located on the Old Navy Base, and Hendricks Park, along Virginia Avenue. The map of proposed rail traffic demonstrates that residents will be cut off from both of these parks—and from future utilization of riverfront properties—by trains exiting the ICTF. The current rail lines that exist along the river are not heavily used, and my family currently enjoys biking to both Riverfront Park and Hendricks Park. Crossing the rails with our children is not a problem as these rails are rarely used and the enjoyment of the parks is rarely interrupted by passing trains. Residents have been inadequately informed of just how much rail traffic would be going through these areas, not to mention that any current estimates could easily be surpassed if the port is successful (as developers are surely hoping it will be). In directing the rail traffic as it exits the ICTF, residents' right to access their waterfront must not be denied. Solutions can be found that do not inhibit the residents of North Charleston from enjoying the current parks along the river and striving for an aesthetically pleasing riverfront for the future. Obviously, the port needs to be located on the river, but there is no necessity for rail traffic to be directed along the river at all.

The State Ports Authority had originally planned to build on the south end of Daniel Island. However, the residents of the relatively new, affluent development on Daniel Island successfully fought having the port built on their peninsula. The State Ports Authority relocated their plans across the river to North Charleston, and the port and related industry are now threatening the more established but less economically advantaged neighborhoods there. My family used to live on Daniel Island and while we enjoyed our time there, we have found a home in North Charleston—a unique place where diversity exists and is trying to thrive—racial diversity, economic diversity, and diversity of land use. Industry exists alongside residential areas and people feel a sense of community because they do “live, work, and play” here. The Environmental Protection Agency states that environmental justice *“will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”* I am writing in the hope that people with consciences will consider issues of environmental justice and how to preserve the special balance that exists in North Charleston and not allow a unique and established community to be “railroaded” for the sake of economic gain.



DEC 2 2015



Mr. Nathaniel Ball, Special Projects Branch  
U.S. Army Corps of Engineers  
Charleston District  
69-A Hagood Avenue  
Charleston, SC 29403

November 24, 2015

Re.: Public Notice No. SAC-2012-00960

Dear Mr. Ball:

It has come to our attention that a new rail line into downtown Charleston, the Southern Rail Connection, is under consideration. While we support improvements to the facilities comprising and serving the Port of Charleston, we have serious concerns with the Southern Rail Connection.

Our property is accessed off of Meeting Street Extension via Cherry Hill Lane. This access is already disrupted by existing rail traffic. There are three (3) rail crossings on Cherry Hill Lane before it terminates into Meeting Street Extension about 1,000 feet away. In fact, we have experienced delays of as much as three hours due to rail traffic blocking Cherry Hill Lane and Pittsburgh Avenue. Naturally such interruptions are costly, and pose a huge safety risk.

There are several businesses at our site that would be adversely impacted by restricted access due to an additional rail line. These businesses include a local lumber and marine supply business that makes daily local deliveries and has significant local drive in and pick-up traffic, a tank container company that dispatches and receives tank containers to and from the local SPA terminals, a structural precast concrete manufacturing plant that receives and delivers multiple loads of supplies and products on a daily basis, a local ready mixed concrete supplier that delivers time sensitive mixed concrete, a Charleston based reinforcing steel fabricator that makes multiple daily deliveries, a distribution yard for a steel foundry that receives metal wear parts from overseas through the Port of Charleston, and a local supplier of landscaping material. Together these businesses employ over 50 people working full time on-site. Denying these people and businesses safe and unimpeded access because of added rail service and interruptions would be detrimental to their safety and economic livelihood. The rail line would also devalue our property as a result.

We therefore request that you deny the proposed Southern Rail Connection. Thank you for your assistance.

Very truly yours,





November 19, 2015

**Via Email: Comments@navybaseictf.com**

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp. Of Engineers  
69-A Haygood Ave.  
Charleston, SC 29403

Re: Proposed Project for NBIF-Southern Rail Connection

Dear Mr. Ball:

████████████████████ writes today to join its many neighbors in opposition to the southern rail connection proposed for the ICTF in North Charleston.

████████████████████ engages in marine contracting and is located at ██████████  
████████████████████ Our employees have already encountered short trains that block Pittsburgh Avenue for over one hour. We have observed CSX crews on breaks where they have intentionally blocked Pittsburgh Avenue. Because Pittsburgh Avenue is the last street crossing before the proposed southern rail connection trains reaches the ICTF, it is inevitable that these longer container trains will block Pittsburgh Avenue for even longer periods of time. The past history of excessive street blockings does not bode well for the future, when trains are much longer and handled by the same CSX crews.

Our biggest concern is the safety of our employees at our ██████████ facility. Our employees work 6-7 days per week at our yard. If an incident occurred, it could delay any needed medical response. It is important that we are able to promptly dispatch from our facility to the dredges. With the high cost of operating dredges today, delays in delivering parts and other important supplies to our dredges, this is totally unacceptable. Therefore, we are greatly concerned about the delays and the economic impact on our company when trains block Pittsburgh Avenue.

Mr. Nathaniel I. Ball  
Regulatory Chief  
U.S. Army Corp. Of Engineers  
November 19, 2015  
Page 2

In addition to the delivery of parts, it is also necessary for us to respond to marine emergencies that may arise during [REDACTED]. The impact of a train with delays of an hour or more could dramatically impact our ability to respond to marine casualties.

If the southern rail connection is permitted to proceed, we ask that the ACE require mitigation by the permittee, consisting of road construction alongside the eastern portion of the railroad right-of-way, allowing truck access from Pittsburgh Avenue to Milford Street when trains occupy the track.

Thank you for your attention to the above comments.

Very truly yours,

A large black rectangular redaction box covering the signature area.

**Appendix F**  
**Scoping Comments Matrix**

| Issue   | Substance of Comments  | Approximate Number of Comments               |
|---|--|--|
| <p style="text-align: center;"><b>General</b></p> | <ol style="list-style-type: none"> <li>1. We operate a business, [REDACTED], at [REDACTED], at the corner of [REDACTED]. We would like to see a rendering of the final result of the removal of Viaduct Rd to our north, and the railway development to our east.</li> <li>2. I would like to know if this will affect my property.</li> <li>3. North Charleston spent \$450,000 to sue South Carolina Commerce, now we are moving the Center more to the south. Noise, quality of life are just as important for the south as in the northern part of this city. Economic growth should also be included in this equation. If the negative impact is the same, then we have some more work to do. Are we displacing residents? Are we again impacting the communities that has been impacted over and over again? \$750,000 move project to south end. Will we spend anything \$750,000 or people in the south end don't count. The human factor must be applied in every decision. Commercial growth without residential consideration will only continue to displace our citizens, negate livability and quality of life. We must formulate a plan, giving commercial growth and residential livability equal considerations. Thank you.</li> <li>4. My husband and I own a home in Hunley Waters, along O'Hear Ave. Since last August we have put up with a bridge closure/construction that cut off our access to downtown North Charleston (East Montague). Now it seems that our neighborhood will again be faced with noise, traffic disruptions, and potential pollution to Noisette Creek and the surrounding marsh- only this time the effects could be permanent, as a result of new railway lines... We bought a home on a quiet marsh that was close to the Riverfront Park (where we got married) and within walking distance of the Olde Village. We have lived in this area for over six years and want to be part of it for years to come. Please take seriously the concerns of all those who came out tonight and those of us who live, work, and enjoy this area. Please share information publicly as it becomes available.</li> <li>5. How is the railway coming through going to effect the people that are not moving, (foundation, building flooding)</li> <li>6. Additionally- we support rail over trucking. We would appreciate investment in some sort of commuter rail to move travelers in sync with these additional freight cars.</li> </ol> | <p style="text-align: center;"><b>28</b></p> |

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|       | <ol style="list-style-type: none"> <li>7. My concern is that I have properties on [REDACTED] and [REDACTED] in North Charleston, SC. So I need to know will the railroad be coming in that area.</li> <li>8. Please provide information on the interchange at Cosgrove &amp; Spruill.</li> <li>9. This looks like a great use of the old navy base, and something that will greatly help the Charleston area economy, both short term construction and long term with the facility. Great idea and well organized meeting.</li> <li>10. Thank you for taking the time to listen to those in opposition of the proposed Naval Base Intermodal Facility. As a property owner on the Upper Meeting St corridor, we are in strong contention of any additional rail traffic, and the subsequent bottleneck effect it would have on the entire area as whole. Many businesses, individuals, and groups have been working directly with the City of Charleston to develop this area in a positive manner. The proposed plan would serve to counteract all that is envisioned for the area. It is our desire to work with the Corps to come up with an alternate plan. A plan that is beneficial to the community as a whole, and meets the goals of the City of Charleston and the business and property owners within this corridor.</li> <li>11. How far from the north to the south will this project impact?</li> <li>12. What happened to the \$750,000 spent to sue commerce?</li> <li>13. Just a couple things to add that I feel have not been addressed in the previous comments was Palmetto Railways said the land was acquired. Who was it acquired from? It was -- I feel it was the State Ports Authority, which previously had an agreement with the City of North Charleston that that land would not be developed and that the Palmetto Railways is part of the state. So, however, they just kind of -- I feel they went around the deal to allow these -- the commerce department to develop that land. A previous fellow speaked about how the land there was very historical, and I do agree with him. And there was also an orphanage, which this would completely just cross right through the orphanage. A couple other things was -- you know, they spoke about most of this. Excuse me. The pollution. And, again, I feel like most of this stuff has</li> </ol> |                                |

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|       | <p>been addressed, but I just had a couple additional things, so...</p> <p>14. Good evening. I would like to address the Palmetto Rail most of all, because they are coming in a community saying that they're going to bring about jobs. And it's just too often that people, political people, are saying that they're going to bring jobs and that jobs overrides everything else. It overrides the quality of life. It overrides everything for the citizens of communities. And I think it's just been too long that that has been the issue that they've been using, that they're bringing jobs in the community and it's going to benefit the community. But the very people who they're supposedly helping, they're running out of the communities. And I think that -- you know, he said that the proposal, that they pull permits and they pull applications. And that's good. But I think that he need to consider -- or they need to consider that, to be good neighbors, that they should do everything that they can, possibly can, to help the communities who they are imposing on to make -- to help make them whole, that our communities are already -- we already have problems. And I think that if Palmetto Rail really wanted to be good neighbors to the communities who they are going to impact, I think that they really need to be good neighbors, be good stewards and not to be a nail in the coffin of our communities.</p> <p>15. I'm not sure exactly what I'm getting ready to say to you. But just so you know who I am, I'm the Token resident on the Navy yard. I own property right there where the train is going to come between Number 1 and Number 2. There's literally a survey stake right now about 40 feet from the back porch of my house. Three years ago when we bought that property, there was an MOU from your Army Corps of Engineers saying that that train was not coming through there anymore. Historic district. My husband and I, with our two young children, have spent a lot of time and resources, love, making that house our home. There's no quality of life with a train 40 feet from my back porch, at all. I wish that we could go back to the original proposition that the trains had promised to take three years ago before we put all of that effort into this. Diminished value of family and hope is what I'm most concerned about. I don't speak for a lot of people here,</p> |                                |

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|       | <p>because I'm really in a weird situation. But I don't understand why it has to come so close.</p> <p>16. If the rail comes through the Navy Yard: Part of American history will be destroyed Nature is going to take a hit Our neighborhood will be cut in half preventing any future residential or commercial development Traffic will be worse, effecting all residents and businesses Our health will be jeopardized Our property value will be reduced Structural issues will require more funds The future of our business will be drastically effected. I believe utilizing existing rail is the solution not building more. Please do not allow this new rail project to destroy, our history, lives and nature.</p> <p>17. My primary concerns lies with health issues and property damage as a result of the proposed rail tracks. The tracks will cross in front of my family's, and others homes within close proximity. My wife and I are trying to keep an open mind, as there is no perfect solution for all. The possibility of new tracks has alarmed us, though, and we can't see too many benefits from our point of view.</p> <p>18. I am a business owner in the area and try to do what I can to contribute to the progress that Park Circle has made over the past decade. But if the rail traffic continues to get worse we will be forced to move and leave the area all together. Should you have any questions about our experience or would like to inspect the house please do not hesitate to reach out. Thank you for your time and consideration.</p> <p>19. I own two pieces of property, [REDACTED] and [REDACTED], which will be grossly affected by the prosed railway. My business, [REDACTED], is located at the corner of [REDACTED]. Our business services primarily commercial truck customers. Currently, these tractor trailers must turn onto Herbert Street to access the property behind our building to be serviced. The front parking lot on Meeting Street is not large enough to accommodate this necessary service. I have two warehouses; one on Herbert Street and one on Harmon Street. I also have a manufacturing plant on Harmon Street. All of these buildings, also including the front shop, receive daily deliveries from various vendors. In addition, my employees work outside adjacent to Herbert Street 20-25 feet from the proposed track. I am extremely</p> |                                |

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|       | <p>concerned how this proposal by Palmetto Railways is going to affect my customers, vendors, and employees. Some of my concerns include access for customers/vendors, worsening traffic congestion, decreased property values, noise/vibration problems, and health effects for my employees working in such close proximity to the track.</p> <p>20. I agree with other members of my neighborhood who so eloquently addressed our concerns in this letter. The plans for the ICTF are threatening this delicate balance that the City of North Charleston is striving to achieve and maintain. Thus far, it is obvious that the economic impact of the proposed facility and railroads has been considered and there are many who stand to profit from this venture. However, now another “E”—the environmental impact, not solely the economic impact—must be considered, and this needs to include the quality of life that North Charleston is striving for.</p> <p>21. This needs to be fairly negotiated which it is not with the tracks going so close to other people’s property which took them years to purchase, rehab and enhance. Stop the big business bully and do what is right. At least be fair and be glad that there are people who are actually trying to do something good for our state. The Palmetto Railways must have someone who is creative enough to device another route among so much land!!!!</p> <p>22. The City of Charleston appreciates the opportunity to comment on the proposed Palmetto Railways Navy Base Intermodal Facility. The proposed project has a new southern loop which prompts significant concerns for the City of Charleston that I would like to share with you.</p> <p>Public Service Operations Center Relocation: The City acquired approximately 16 acres of land north of Herbert Street for the construction of a new public service operations center for Police, Fire and Public Service after many years of negotiations. As currently shown on the plans for the project, the southern rail connection will extend through a portion of this site and affect the size of the operations center and access to/from the property. Since emergency access and daily access are critical to the public service operations center to enable the City to provide essential police, fire and public safety services to its residents, this location will be completely compromised and therefore will</p> |                                |

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|       | <p>require relocation. Due to the potential impact of the southern rail connection on our site operations, the City has currently stopped the design and construction of a police maintenance facility to be built as part of the 16 acre operations center. This disruption in our project's timetable has pressed us to lease an alternative facility until resolution of this impact is determined.</p> <p>Consent: South Carolina Code §57-5-820 provides that all work to be performed by the Department of Transportation on state highways within a municipality must be with the consent and approval of the proper municipal authorities. Given this statutory requirement and the fact that a portion of the Palmetto Railways Navy Base Intermodal Facility project is within the corporate limits of the City of Charleston, the City's approval is essential before any work on any state highway within the project area can commence. The City cannot approve this project until its concerns as set forth in this letter are satisfactorily addressed.</p> <p>If my staff can be of assistance to the search for alternative sites for the rail, please let me know. We are currently talking with Palmetto Railways regarding our public service yard and welcome the opportunity to meet with Palmetto Railways along with the U.S. Army Corps of Engineers to discuss our concerns, possible alternative sites and/or mitigation measures so we may all work together to ensure the success of our independent interests and grant the requisite statutory consent for the project to proceed. <b>(City of Charleston)</b></p> <p>23. Palmetto Railways is planning to route a section of their railway in extremely close proximity (75 feet) to the [REDACTED] building located in North Charleston. This action would prove very harmful to the mission of this great organization which provides a critical and irreplaceable life-line of hope and support to the most vulnerable children of North Charleston and surrounding counties. The proposed location of the track would subject the children and their supporters to unbearable noise levels, and exposure to diesel fumes. Additionally, the closeness of the track, a mere 25 paces from the doorway, would ruin the property value making any sale for relocation almost impossible. Surely, reasonable people can agree on other options. Palmetto Railways owns many adjoining acres of land...can they not modify the route of their track so as</p> |                                |

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|       | <p>not to negatively impact valuable services to our needy children. Please use all influence and decision making power you have to save our [REDACTED] program!</p> <p>24. I want to protest the railroad tracks planned by Palmetto Railways to be place a mere 75 feet from the [REDACTED] facility. This wonderful charity serves the most vulnerable children in North Charleston. Please reconsider the placement of these tracks or move them at least 300-400 ft. and provide a sound buffer.</p> <p>25. I am informed that [REDACTED] is resisting the proposed railway on the Naval Base because it runs 79 ft from their "door." I have the following [REDACTED] comment:<br/> I support both the work of the [REDACTED] and the need for intermodal improvements for the Port. This is a very much needed project and should go forward as planned and as expeditiously as possible. [REDACTED] has the following options, [REDACTED] at [REDACTED] least:<br/> 1. Move to a more desirable location. This would be much easier than the Port trying to find an alternative to [REDACTED] the [REDACTED] railway [REDACTED] plan;<br/> 2. Stay where they are and let the railway go through. They are a commercial activity which is minimally impacted by the railway being located next to their shop.<br/> The Port is very important to the commercial network of this entire region. The railway must go somewhere and this is the best location. Let it stay as planned!</p> <p>26. I have long been a donor to the [REDACTED] [REDACTED]. They are one of the best charitable organizations in Charleston, SC. No one else is there to provide clothing, shoes, underwear, toiletries, books, stuffed animals, and books to the many, many foster children in this area. If you build your railroad so close to their building, I fear they will no longer be able to continue their work. Please count me as one citizen who is concerned about this situation.</p> <p>27. Where could I learn more about the building of a railroad so close to [REDACTED] and if there might be a better alternative?</p> <p>28. As you know, there are other structures that will be affected by this new proposal, among them there is an orphanage.</p> |                                |

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| <p style="text-align: center;"><b>Public Involvement</b></p> | <ol style="list-style-type: none"> <li>1. To whom it may concern and in regards to Public Notice Number SAC-2012-00960: This comment is being written on September 23, 2015. There has been an ongoing survey very recently on the northern end of the navy yard. There are survey stakes and markers everywhere. Some of these stakes are literally through my back yard. There has been no public announcement to indicate that the proposed rail track has changed. However, the survey stakes are a stark indication that it HAS indeed changed... When are you planning on notifying the public of the rail lines' new intentions? How close to my home is the railroad allowed to build????? Their markers are not more than ten yards from my back door. Are there any plans of updating this information in the near future?</li> <li>2. I also recommend that people should be able ask questions in a public forum. It is nice to hear information presented but once it has people should be able to ask questions.</li> <li>3. We keep coming to these meetings. We try to stay abreast of the latest developments. We take time away from our work and families to learn the latest plan, and then a few months later, it changes again. Then there's the plan itself. The state of SC has asserted itself as an entity above reproach. We support development throughout the state. However, the lack of concern for individual property owners, renters, workers, students, etc. is abhorrent. Our voices are "heard" at meetings, then the State allows the railways to do as they please, then we have another placating meeting to kick the can and hush the majority of residents until they, and their limited resources, are depleted &amp; defeated. We are tired of the back-and-forth. We want a safe place to raise our families and grow our businesses. The precedent that SC set by condemning the land they want for their purposes leads those of us who are small business owners in jeopardy. Is anywhere in the State safe to put down roots? Will powerful rail concerns always trump our rights? Who will be responsible for measuring the air quality at this project site? How often will this be done, and where will the results be poste for public viewing? We come again and listen. But it smacks as futile. We're not Volvo or CSX or Norfolk Southern, but we are dedicated and diverse South Carolina citizens. I hope that counts for something.</li> </ol> | <p style="text-align: center;"><b>13</b></p> |

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|       | <p>4. We are in constant contact with our neighbors and no one is happy with this revision. We will work with Corps to come up with a reasonable solution that will help better benefit the existing community and the current goals of the City of Charleston for this part of the upper peninsula.</p> <p>5. I'd like to say that the neighborhood that you're talking about impacting has been there since the early 1800s. And no one has even taken the time or the concern to do a survey to ask them what they feel about this new project coming. Whether or not a new railroad, heavy trains are going to disturb the foundations for those homes for years to come, not whether there will be a survey that will continually keep up with whether or not there's an impact. When we take a look at the fact that the Union Heights area, one of the oldest areas in the state, particularly for African-Americans, and it's surrounded by a track now. People are trying to purchase the homes without even telling them who's trying to purchase it, because no other person will come in to purchase a residence if they know that there's going to be a rail there. So it has to be a business that's coming in in order to do that. That's the only way they would get some value out of it. When we take a look at even this process, we have the scoping. The other things that were actually presented frustrates and puts the public in a position that it's information overload. At this point, it's only the scoping that we're looking at. And so the very way it's set up, you show it to us. There's no interaction in terms of a dialogue, only a monologue. I'll tell you, we will hear you say something, but there's never any interchange in terms of what we care for our community. These people have given their lives to live here and they have to live here even though the trains come through. We think that it is extremely important for the company who wants to come in and change an environment like that to have a sitdown, honest dialogue with the people that live here. That's the only way that there is a good-faith effort to say that there's a good government, as well as a good corporate citizen who wants to come in and help add value to the community. Without that, as I said, it's a one-way conversation that does not consider the needs of the people that live there. I hope they would consider that. Thank you.</p> |                                |

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|       | <p>6. Hello. I just have a couple of brief comments. I know you said not to speak if something has already been covered, so I've checked off about ten items of my list so far. But I don't think the full depth of how we're feeling can really be understood if we're not allowed to comment on things that have already been spoken [sic] to. So I hope this is all being recorded, as I'm sure it has, and it can be considered against the U.S. Army Corps of Engineers.</p> <p>7. You asked earlier who had been to the one two years ago, and I did express that concern. And I really appreciate the gentleman's comment about this being a monologue, because, really, I haven't really heard anything back about that.</p> <p>8. An interesting point, I received a letter from Palmetto Rail before the scope meeting. It's language sounded very confident, as though no matter what the outcome of your report, they have already come to the conclusion that they were going to run the rail through the Navy Yard.</p> <p>9. I attended the ICTF Public Scoping meeting on October 27 and plan on submitting more detailed comments in writing soon. I did speak briefly at the meeting on the general need to consolidate the rail lines and bring CSX back to the planning table. I would like your consideration for inclusion in the followup discussions that will lead to the final report. Many residents of North Charleston will be making sacrifices and decisions that will last a lifetime and I believe we need to honor that with the best possible plan for the future of the region. I believe we should be looking at the impact over the next 20-40 years, including the impact to future economic development and growth to the geographic center of a growing region. I believe my growing resident following, communications skill set, and ties to various community and neighborhood groups would add value to your process. I recently ran (unsuccessfully) for [REDACTED]. While [REDACTED], the incumbent, won the seat, it was a very respectful campaign oriented around progress for the community and [REDACTED] and I (along with [REDACTED]) plan to work cooperatively in the near future. During the campaign, I was able to build a community of residents through email, facebook,</p> |                                |

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|       | <p>twitter, in-person canvassing, community meetings, and my campaign web site. I am now converting those campaign communication tools to continue to be in touch with District 8 and wider North Charleston residents on important issues - including rail traffic, transit issues (public transit, sidewalks, bike lanes, roads, traffic calming), affordable housing, and community resources. I have over 600 facebook followers on my community page and participate in several other community pages. I have an email distribution list that is 400 households and growing, and I received 527 (32%) of the vote in my district. I also have relationships with several local churches, the Metanoia group, the Upper Peninsula Initiative, and contacts in the cities of North Charleston, Charleston and the county of Charleston. In my professional life, I am the CFO for [REDACTED] (since 1996) and I serve on the [REDACTED] for the City of North Charleston. I appreciate the evaluation role that ACE has and I believe there is still room for this project to further improve. I believe we have a huge opportunity in this plan to re-align and consolidate rail traffic so that the upper peninsula, neck, Union Heights, Chicora/Cherokee, Park Circle, Liberty Hill, and Charleston Farms neighborhoods (as well as those outer neighborhoods also rail adjacent) can not only reduce the impact of future rail traffic, but lessen the impact for the rail traffic that already exists. I would welcome the opportunity to speak with you at your convenience.</p> <p>10. For the sake of the residents who would be forced to bear the burden of these new facilities, the following three concerns need to be addressed by the environmental impact study: 1. Communication and dialogue: Residents should have an opportunity to dialogue (in contrast to a monologue, as was pointed out at the last public meeting) with those in charge of the planning for both the port, the ICTF, and the railways. Since residents are being asked to shoulder the negative impacts of the new facilities, they should have the opportunity to meet with those who benefit financially from these facilities. I believe the financial stakeholders should be willing (required, if not willing) to talk face-to-face with those who live, work, breath, and raise families in close proximity to their business ventures. This will go a long way toward improving local</p> |                                |

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|       | <p>perception of the facilities. It is by no means a new concept that a business venture entering a community should work to include the community members and ensure that they are valued and listened to. This has not happened yet in this project, and it needs to occur. The last public scoping meeting I attended had the feeling of a legal formality rather than a real opportunity to listen to the community. Other industries that have come into the area have demonstrated the willingness to show concern for residents and have thus been well-received. One particular business near our house has sent representatives to our neighborhood meetings, sent out e-mails letting residents know about issues that may affect them, and set up a community relations panel that holds regular meetings at which members of the community can receive updates and voice complaints.</p> <p>11. The fact that the city has opposed many facets of this facility is notable, considering that it is coming from a city which works hard to encourage economic growth and opportunity. The residents of North Charleston, while far from resenting the industry that thrives in their city, feel taken advantage of in the underhanded proceedings surrounding the plans for the new port and the ICTF. The current plans for the port, ICTF, and rail traffic are drastically different from what residents relied on when first accepting the idea of the new port being located in their city. If the ICTF plans are carried out as proposed, residents of North Charleston will be faced with increased rail traffic along with accompanying noise, pollution, and loss of aesthetics and opportunities.</p> <p>12. I am writing to voice serious misgivings about the proposed plans for the Intermodal Container Transfer Facility (ICTF) which is being considered for the City of North Charleston. My concerns fall into three main categories: lack of dialogue with and respect for residents, pollution related to the ICTF and associated rail traffic (noise and air), and cutting residents off from current and future access to and enjoyment of waterfront lands in North Charleston.</p> <p>13. This is in response to your request for relevant focused input from stakeholders on the scope of the proposed construction and operation of the Intermodal Container Transfer Facility (ICTF) located on the former Charleston Naval Complex (CNC) in North Charleston, South</p> |                                |

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|                            | <p>Carolina including identification of a range of reasonable alternatives and environmental issues the Corps should analyze. I thank you for allowing me the opportunity to inform you of the impacts that will affect my constituents. For the past five years, the citizens of North Charleston have sacrificed their time to participate in federal, state and local ICTF public engagement processes and provide oral or written comments during the SC Legislative Review and Oversight Commission Public Hearings, the November 14, 2013 and October 27, 2015 Army Corps of Engineer's Public Scoping Meeting and Open Houses. As a result, I have summarized the following list of potential environmental impacts and request the Corps continue to work with community residents and city officials throughout the development of the Draft Environmental Impact Statement (EIS). <b>(City of North Charleston)</b></p>   |                                |
| <p><b>NEPA Process</b></p> | <ol style="list-style-type: none"> <li>1. Questions regarding timeframe for the completion of these two phases.</li> <li>2. Although not required under NEPA our community (Union Heights) would like to have a Health Impact Assessment (HIA) prepared. There needs to be a mitigation plan prepared for the community.</li> <li>3. A new EIS will create a burden on the residents of Union Heights by having to attend another round of public meetings, provide comments and reading the draft and final documents. I would like the study to investigate and analyze if the process is a violation of Title VI of the Civil Rights Act. The community opposed a southern access which is documented in the LAMC Revitalization Plan which was adopted by the city in 2013. Further, the original EIS did not make provisions for rail to the south or a southern route. Now SC Palmetto Railways is reversing or trying to reverse a Record of Decision. This is discriminatory and devalues the sentiments of the community. I strongly oppose and object to a new EIS and rail access to the south- mitigation or no mitigation!!</li> <li>4. Thirdly -- well, the last comment that we have that we would like to see in the EIS is that we would like to include a comprehensive demographic analysis of all the neighborhoods within a one-mile radius of the facility. <b>(LAMC/CRAB)</b></li> </ol> | <p><b>12</b></p>               |

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|       | <p>5. I own more than four acres between [REDACTED] Street. The gentleman that was speaking on behalf of Palmetto Railways stated that one of the reasons they are considering the southern route is because CSX owns property -- I think 250 acres -- that they could not purchase. I would like to Corps and the EIS specifically to address why Palmetto Railways, which I understand is a public agency, is not in the process of condemning through eminent domain that property and instead condemning the property associated with the southern route.</p> <p>6. The EIS should include a social impact assessment of neighborhoods within a 10 mile radius to include the Bennett Yard Road CSX intermodal yard.</p> <p>7. For the sake of the residents who would be forced to bear the burden of these new facilities, the following three concerns need to be addressed by the environmental impact study... 2. Ongoing pollution— both noise and air quality: The amount of increased noise and air pollution likely to be generated by the ICTF and the associated rail traffic needs to be studied along with its environmental and health impacts. The findings need to be thoroughly and promptly reported to the community and steps taken to mitigate them both in the planning stages and going forward into the future, as the amount and effects of noise and air pollution could significantly change over the life of the ICTF.</p> <p>8. Additionally, there is no legally enforceable way to prevent such additional intermodal trains also from stopping and idling for hours, or to prevent them from increasing in length weight and frequency of standby time during switching operations, well beyond levels currently proposed and after the permitting process is complete. Accordingly, we are concerned about the effects of increased vibrations, noise and fumes on the work of our tenants, ourselves, and future potential occupants, as well as the structure itself. We appreciate your consideration of the above comments.</p> <p>9. The permit for the port terminal required the SPA to comply with the MOU with the City on port development and thus it is disingenuous to suggest the Corps has no jurisdiction over human impacts of the dramatically increased rail traffic on the Virginia Ave corridor.</p> |                                |

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|   | <p>10. We hope that the Corps will do right by the citizens of North Charleston in its determination of the elements of the EIS analysis and just mitigation measures. With the most recent changes to the ITCF, additional wetland impacts and rail routing we feel that the assessment of impacts from the development should be extend east to west from the Ashley to the Cooper Rivers and from south to north from the southern city limits to Ashley Phosphate Rd. <b>(City of North Charleston)</b></p> <p>11. Thanks to the Army Corps of Engineers (the Corps) and Palmetto Railways for organizing the public scoping meeting on October 27, 2015 regarding the referenced undertaking. The meeting was informative and provided a greater understanding of some of the community's concerns. During the public comment period, we would like to offer our comments on the referenced undertaking. In addition, the Preservation Society (PSC) is hereby requesting consulting party status in the Section 106 review for the referenced undertaking... As the Corps prepares its EIS, we ask that you consider our comments. In addition, when appropriate, please provide notice confirming our consulting party status, as well as notice of the commencement of the Section 106 process. <b>(Preservation Society of Charleston)</b></p> <p>12. Further, before the City can approve the project, the City would like the U.S. Army Corps of Engineers to encourage Palmetto Railways to evaluate critical impacts the southern loop alignment will have on affected areas in the City of Charleston by conducting impact studies, especially those impacts pertaining to traffic, noise, pollution, public safety and resident inconvenience cited herein. <b>(City of Charleston)</b></p> |                                |
| <p><b>Alternatives &amp; Project Design</b></p> | <p>1. Thank you for the opportunity to respond to the revised proposal to which I stand opposed. Specifically, my opposition is based on ANY additional rail crossings on Meeting Street Road south of the Meeting Street &amp; Spruill Ave intersection for reasons set forth below... There are better solutions than the #6 Southern Rail Crossing, most notably around Kingsworth Avenue where other public authorities have taken stake.</p> <p>2. Against your proposed "#6 Railway Crossing" because it will effectively cut off property owners on and east of Meeting Street Rd north of Herbert St. from the City of Charleston emergency services. The project benefits</p>   | <p><b>25</b></p>               |

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|       | <p>the City of North Charleston yet you are burdening the property owners in the City of Charleston with the inconvenience and hidden cost in supporting its ongoing operation. Keep you crossings north of Kingsworth Avenue.</p> <ol style="list-style-type: none"> <li>3. In Ravenel is an about to be adopted commercial / industrial special district (Spring Grove) that will need rail access for both goods and commuting workers. In your design please provide for these features in the future.</li> <li>4. Additionally, we have security concerns as the terminal is immediately adjacent to housing and training areas for Federal Law Enforcement officers. FLETC also has access concerns for the 3,00+ employees on the complex, particularly with the proposed removal of the Viaduct interchange. <b>(FLETC)</b></li> <li>5. What is the underlying (read hidden) reason for choosing the Naval Base site, when the site selection process done by SC Dept of Commerce clearly favored the MaCalloy Site for several reasons? This question is compounded by the fact that you are now proposing a south access.</li> <li>6. What is the reasoning for separate paths for NS &amp; CSX would it not be less intrusive overall to put both tracks parallel if both, NS &amp; CSX, want their own line to the ICTF? Do the 2-4 trains proposed/day leaving ICTF plan to stop across any of the many at-grade crossings? I really think consolidating is much better for the community. The southern access will negatively affect many households that do not have the resources to protect themselves. Now is the time to protect them by not allowing the southern access. The north access should be walled off from Buist crossing to the crossing at Rivers to protect Park Circle. Also Virginia Ave. should be realigned to put truck traffic on the side of the wall with the trains there by the road should be split into 2 two lane roads. At grade crossings of major roads should be eliminated in favor of fly-overs- albeit expensive the budget for this project is \$270m. So there is some money there to do it right. If it must be done at all. 6. Why not run tracks onto the terminal and have direct loading; this whole plan seems half-cooked.</li> <li>7. Questions: 1. The northern track to be built through the old naval hospital's historic district is to go over the new railroad bridge across Noisetette Creek? Is this bridge the</li> </ol> |                                |

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|       | <p>only track to be used going north? Will it be built higher because of the water level and the weight of these trains? Will it be very, very strong to withstand flooding and hurricane-like conditions? 2. Planning this way to try to avoid as much impact as possible to our neighborhoods is a better solution than your first plan, but how many additional trains a day will the neighborhoods have? Will the trains be two containers high? How long will they be? 2. Will we get the overpass over the train track across North Rhett Avenue as promised in the agreement?</p> <p>8. The southern tract which is closer in proximity to the new port but lacks a Norfolk Southern rail seems a much more viable solution and one that could be remedied for N.S. with some creative effort. Save the vision. Save the city. We can have it all.</p> <p>9. Why was the Naval Base chosen over the MacAlloy Site even after all of the preliminary research shows that it would be a better location, especially now that the route will lead out of the south?</p> <p>10. I own [REDACTED], which is adjacent to the Bexley Spur. I am very much in favor of this new plan. The potential for the reactivation of the Bexley Spur has cost me one deal and dramatically decreased the value of my investment. (anonymous)</p> <p>11. There are better solutions than the #6 Southern Rail Crossing, most notably around Kingsworth Avenue where other public authorities have taken stake.</p> <p>12. Like plan shifted from Bexley; I want overpass over Spruill and Rivers</p> <p>13. Don't want St. Johns to be closed on McMillan side</p> <p>14. Expand impact zone; look at crossing at VA and Noisette needs crossing arms</p> <p>15. I live in the Park Circle area. And I think one of the key things, as a couple of people have mentioned, is we need to be consolidating rail lines, not activating more rail lines that are in limited use and they are going to be put in fuller use. And I would urge Palmetto Railways to go back to the table and do whatever they can to work with CSX to be consolidating lines instead of activating additional lines.</p> <p>16. I live next to re planned railway in North Charleston. I do not mean to sound "politically incorrect" by saying this, I am just stating the facts. The new plan will effect homeowners who have spent their life savings repairing</p> |                                |

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|       | <p>the neighborhoods so that they can personally live there while the Cherokee - Chicora is made up of rentals where no one tries to make it better. It is a crime infested area where slum lords over price low income housing. Most of the homes are section 8 where the tenants only destroy the properties and the landlords do not care... The homeowners on the old Navy base are so proud of what they have done. It has made our neighborhood a crown jewel that has done nothing but better the living standards. Please reconsider.</p> <p>17. Currently, there are existing grade crossings a block before (Meeting/Cherry Hill) and a block after (Meeting/Milford) the intersection of Meeting and Herbert Streets. It seems these existing tracks could be adapted instead of creating another grade crossing, which would total 3 crossings in a 3 block section of Meeting Street... The proposed plan calls for one long 8% curve that crosses over multiple properties to connect the 2 lines. The same result can be achieved by connecting a new line at Milford. The current line that is dedicated to Kinder Morgan can be moved over to allow for a new parallel Intermodal line at Milford. This new line would not be a continuous 8% curve as the current plans shows, but an 8% curve then a straight line with an 8% curve on the other end to connect the two tracks. This would limit the amount of new track and would not disrupt long time existing businesses in the area. It would also keep the railroad tracks all together in one area. According to the exhibited drawings, there are already 8 tracks in this area and there appears to be room for a ninth line to be added. In closing, I want to state that I am very opposed to this proposed "southern rail connection". I believe it will harm my current business and property value. I believe other solutions are possible to achieve Palmetto Railway's objective without damaging many existing businesses.</p> <p>18. The private drayage road element was necessitated by a condition of the 2006 Port of Charleston EIS stating that no rail will leave the facility. The drayage road is inefficient that is only considered in the context of the 2006 Port of Charleston EIS commitment. The whole Intermodal Container Transfer Facility is against the intent of the "No Rail" commitment in the Port of Charleston EIS. For Charleston to be a world-class port</p> |                                |

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|       | <p>city, which is in the best interest of all its citizens, inefficiencies must be eliminated.</p> <p>19. I am writing to provide comments regarding the southern rail connection proposed for the ICTF in North Charleston. Our law firm is located at [REDACTED] [REDACTED]. We share a parking lot with [REDACTED] at [REDACTED], which will likely be condemned for a right-of-way as part of the project if the southern rail connection is permitted. We have many concerns regarding the southern rail connection, including the impact on our local business community, as well as our business in particular... In short, we are concerned about the direct impact on our parking facilities, the extended delays for important travel by our employees, and the impact on meetings and work areas imposed by vibrating trains. Thank you for your attention to the above.</p> <p>20. It has come to our attention that a new rail line into downtown Charleston, the Southern Rail Connection, is under consideration. While we support improvements to the facilities comprising and serving the Port of Charleston, we have serious concerns with the Southern Rail Connection.</p> <p>21. [REDACTED], Inc. writes today to join its many neighbors in opposition to the southern rail connection proposed for the ICTF in North Charleston.</p> <p>22. Although I support a state-of-the-art intermodal hub serving the Port of Charleston, I am deeply concerned about the Southern Rail Connection.</p> <p>23. My name is [REDACTED] and I am the owner of a small business, [REDACTED], located on the corner of [REDACTED]. I am writing you today to express my concern in regards to the Southern Rail connection that is being proposed near my business. This addition rail line will cause extra burden onto my business and the folks living in the community.</p> <p>24. Alternatives Analysis: The new plan for the ICTF has rail running both out of the north and south ends of the former CNC thus impacting a greater swath of the City than previously proposed. The southern route which connects to the Central Rail Corridor, was proposed by the City during the first discussions of this project and it appears that SC Public Railways is moving toward that solution. An alternative analysis that investigates the</p> |                                |

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|                       | <p>impacts of sending both rail carrier to the south or both lines to the north should be compared to assess the cumulative impact of the expansion of this project scope. Additionally, SC Public Railways proposes to construct a southern line through 10 distinct properties in the City of Charleston to establish an east/west connection to the central rail corridor. The existing east/west connection is jointly owned by NS and CSX and would require the acquisition of only 1 or 2 properties in the "Neck" and utilize existing rail which is underutilized now. A project of this magnitude should be used to consolidate rail line usage and impacts not to expand them. Furthermore, the original Alternative Analysis was restricted to properties which were owned by the SC Public Railways, thus eliminating the former Macalloy Site from consideration. With the current changes bringing additional impacts to the south, would it be appropriate time to look at alternate sites including the former Macalloy site. The City has always believed that a southern route from the Macalloy site was always the best option to minimize impacts to the public and to the environment. I request that the Corp to require an assessment of this alternative. <b>(City of North Charleston)</b></p> <p>25. Given the vast detrimental impacts the southern loop alignment will have on the City of Charleston and in order to allow the City to be in a position to approve this project, we respectfully ask the Public Railways to continue to investigate other location options for the CSX connection. If the two rail connections can be consolidated into one access point, this change will dramatically reduce impacts to the City of Charleston. <b>(City of Charleston)</b></p> |                                |
| <b>Socioeconomics</b> | <ol style="list-style-type: none"> <li>1. Looking at the map and the proposed project, the area surrounding will be significantly affected negatively. This project will cut through an area many have invested as their home and would devalue any possible future investments.</li> <li>2. I also see it affecting negatively the value of our property. I realize these connections must be important or would not have been considered of being built. Yet, I feel it would create major problems for our area. I respectfully ask that you consider the negative impact on our and surrounding businesses. Thank-you for your consideration of my thoughts.</li> </ol>   | <b>18</b>                      |

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|       | <ol style="list-style-type: none"> <li>3. Decrease in value of my property</li> <li>4. Please make available to businesses and especially to residents the professional opinion of the impact of this project from the CTAR- Charleston Trident Association of Realtors. Please have them involved in the pros &amp; cons and in helping residents understand any good or bad impact on their properties marketability and value.</li> <li>5. The Park Circle community is in the midst of a highly-publicized revitalization and this proposal could dramatically impact this area's growth &amp; development.</li> <li>6. Also I am very worried about foundation problems to my home!!</li> <li>7. Good evening. We are [REDACTED]. We own a number of properties directly in the Chicora-Cherokee community of North Charleston. To be exact, it's [REDACTED] parcels, many of which are operating businesses. We have dedicated three decades of our lives in that community to help it to grow and to change the density of it. It was once a poverty-stricken area; now that area has changed cosmetically. During our presence over the years, we've done everything without any assistance, all by way of sweat equity. It is our understanding that this rail yard will be established adjacent to our property. We've worked very hard for the properties and the businesses we've established in that community without any assistance. We're a grassroot organization. We've invested a lot of money into our companies and projects in the Chicora-Cherokee community without any type of support. We try not to get involved with bureaucracy and City policies, but this rail yard has really become a concern. The rail yard is an issue that has been introduced and spoken of. But we didn't really realize the impact that it would have on the established businesses and the properties that we've spent a lot of money on over the years. Definitely this rail yard will affect our property and the growth, the value of the properties.</li> <li>8. And I just wanted to also state that I'd like to hear that you would make available to the businesses, and especially to the residents, the professional opinion of the impact of this project as we can get from CTAR, the Charleston Trident Association of Realtors, and have them involved, to give the pros and cons of a project like this. Because in transitioning to commercial, there is an opportunity that many of the residents will see an</li> </ol> |                                |

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|       | <p>increase in their property values, and they need to be aware that it's not all downhill. There are pros and cons. But there are pros, and they need to have some expert opinion, preferably from both the residential and commercial sides of our realtors.</p> <p>9. And I do worry about structural damage to the house and the money that I put into the house. Not just the quality of life issue, but there is a real economic concern there. But not only in terms of the property value but how much money do I have to continue to put into the house to make repairs for any potential structural impact, especially from some very heavy, heavy trains. So that's my primary concern.</p> <p>10. One of the reasons why we purchased our property was its zoning which is residential/ business. This allows us to live on the Navy Yard and also use it for merchandise staging, storage, and restoration. During the restoration of our property, we added a heavy duty driveway connecting [REDACTED] for eighteen wheeler trucks bringing our containers, for our trucks and trailers. In addition, we built a wide handicap ramp to allow cargo access into our building from this driveway. The new proposed rail tracks make it so that we would be unable to access our property from Avenue F., and container truck access becomes impossible.</p> <p>11. There is a proposed rail road addition to be made in the St. John's Avenue area of North Charleston. I understand there is much to be planned and the formalities are still in the making. The intent of this comment is to tell you how the new rail would impact myself, my husband and my neighbors negatively. We view the area of St. John's as up and coming. While at the moment, it is not the safest, nor the most well developed area of North Charleston, though we certainly hope it gets there! Our interest in finding a home this area were for this very reason - we believe that the area is indeed up and coming for a revitalization. The new construction of the O'Hear bridge, the new restaurants being added to Olde North Charleston, the new developments throughout Park Circle really give us hope to that area. [REDACTED] [REDACTED] off of Avenue F (close to St Johns), Hunley Water's behind us, and the new bridge really give me hope that safety and revitalization is about to happen in this area. I feel, along with my husband, that the</p> |                                |

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|       | <p>addition of new rail tracks will only deter future growth in that area. Our concerns for our personal safety in the area, paired with new safety concerns with a railway, not to mention any noise pollution or physical pollution the railway would cause. This proposed addition makes us worried not only for ourselves and our property, but the neighborhood and area as a whole.</p> <p>12. We are writing to you about the proposed southern loop of the railroad that will ultimately cause us to lose our property. We own ██████████, Inc. My wife and I opened this business in 1994, and purchased this piece of property, ██████████. In 2007. Which is at the corner ██████████. We were off ██████████ the 1st 12 years of business. These locations are in the perfect area for my wife &amp; I to run our business. It took our 12 year savings and a \$20,000 loan out against our home to purchase it. We deal with customers from downtown to Kiawah, and Awendaw to Summerville, but most our business is downtown Charleston. It took us almost 4 years to find a piece of ideal property for us to purchase and would be very debilitating to our family to lose it. This property was my wife and I's retirement. We had intentions to sell it in 10 to 15 years or lease it. The way Charleston is growing north and North Charleston growing south, we would make a very large profit for us to live on in our retirement. If we keep it and leased it, the property would one day belong to our children can be a very valuable piece of property as we all know there is hardly any property left in our area for sale. If we could find a fenced in, half acre with a new 5000 square foot shop in the downtown area, it would cost an arm and leg. At the present time we still have a daughter at the college of Charleston and will be heading to medical school soon. We hope that your final decision on this route of the railroad could spare us and not cause us or our company this kind of setback.</p> <p>13. ██████████, Inc. is a manufacturer and installer of prestressed concrete piling. Our product is used in deep foundation work throughout the area and is always on the critical path of any construction project that we're awarded. Examples of the projects that we've serviced in the past 24 months include hospitals, manufacturing facilities, parking decks, multifamily / student housing projects, and many other time sensitive</p> |                                |

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|       | <p>owners. We are located at [REDACTED] and have significant concerns regarding the expansion of the rail service parallel to North Meeting Street. It is certain to have an impact on the cost and schedule of our manufacturing and installation operations. In general, our work follows the pattern outlined below: 1. We are awarded a contract for a project and are mobilized on site within weeks to begin load testing. 2. Once load tests are completed, we begin casting concrete piles specific to each project. We utilize 8-18 loads of concrete each day and casting must continue in a uniform fashion once the pour starts. Concrete pours can last 2-5 hours depending on the days demand and can experience significant and costly quality issues if delivery of the concrete is delayed. 3. Within a week of beginning production of piles, we start installation of the product. Our pile driving rigs are fed directly from pile supply at our yard with 2-4 trucks delivering 10-25 flatbed loads each day. With limited laydown space on projects, the efficiency and profitability of our installation operation is dependent upon consistent and timely delivery of piling cast and delivered from our [REDACTED] location. The process described above runs in a continuous and time sensitive cycle with the constant threat of claims for damages if the process is delayed outside the responsibility of the owner / GC. As you can see from the general description of our work, additional rail traffic on an already busy line would have significant impact on the supply of time sensitive raw material (concrete) to our plant and to the delivery of finished product to our onsite driving rigs. With crews and equipment in both locations that run hundreds of dollars per hour servicing projects with liquidated damages that are, at times, tens of thousands of dollars per day, you can understand our concern with added restrictions that will undoubtedly limit and delay our supply chain.</p> <p>14. As a business that is planning to expand in the next couple months, we will have a front office space being leased out, and we fear that the new Southern Rail Connection could be a reason for people to look elsewhere - it's noisy, annoying when the road is closed and sometimes can be dangerous.</p> <p>15. I have owned and operated a general contracting firm located at [REDACTED] since 2001. This business</p> |                                |

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|       | <p>location has proven to be extremely convenient for my employees and clients over the years. It is my expressed desire to remain at this location long into the future. As a contractor, time is what I sell, thus any disruption to my daily routine is sure to equal a loss in company revenues. Your proposed new rail line servicing the port expansion will adversely affect my daily operations greatly and with more expected delays to the already burdensome BMW operations. Please consider an alternative route to your newly proposed rail service which is currently being considered.</p> <p>16. There are several businesses at our site that would be adversely impacted by restricted access due to an additional rail line. These businesses include a local lumber and marine supply business that makes daily local deliveries and has significant local drive in and pick-up traffic, a tank container company that dispatches and receives tank containers to and from the local SPA terminals, a structural precast concrete manufacturing plant that receives and delivers multiple loads of supplies and products on a daily basis, a local ready mixed concrete supplier that delivers time sensitive mixed concrete, a Charleston based reinforcing steel fabricator that makes multiple daily deliveries, a distribution yard for a steel foundry that receives metal wear parts from overseas through the Port of Charleston, and a local supplier of landscaping material. Together these businesses employ over 50 people working full time on-site. Denying these people and businesses safe and unimpeded access because of added rail service and interruptions would be detrimental to their safety and economic livelihood. The rail line would also devalue our property as a result. We therefore request that you deny the proposed Southern Rail Connection. Thank you for your assistance.</p> <p>17. It is important that we are able to promptly dispatch from our facility to the dredges. With the high cost of operating dredges today, delays in delivering parts and other important supplies to our dredges, this is totally unacceptable. Therefore, we are greatly concerned about the delays and the economic impact on our company when trains block Pittsburgh Avenue. In addition to the delivery of parts, it is also necessary for us to respond to marine emergencies that may arise during dredging operations. The impact of a train with</p> |                                |

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|                        | <p>delays of an hour or more could dramatically impact our ability to respond to marine casualties.</p> <p>18. Also there is the impact on property values to the area. I have worked my entire adult life to build my business and I refuse to see it cheapened by the intrusion of more loud, rusty, graffiti covered rail cars. This area is becoming a hub for young entrepreneurs who are turning it from a blighted eye sore to a destination. I believe it is the job of the Army Corp of Engineers to look out for the best interest of the local community and business owners rather than bend to the demands of a faceless corporation as the next railroad might be in your back yard.</p>  |                                |
| <p><b>Land Use</b></p> | <ol style="list-style-type: none"> <li>1. The new American city plan for the Navy Base was critical to helping the city of North Charleston throw off the industrial mantle and remain relevant as a livable city. The Navy Base represents one of the only opportunities that the city has to touch the water with a home or a business- something that is lacking even with our neighbor city of Charleston. It is a travesty that this unique opportunity is squandared because of the gross mismanagement by Noisette. The vision remains, the city is ready for it to become a reality. Along comes state officials from off, who stab a railroad terminal through the heart of such a worthy vision with no concern for the action and the loss of the future that it represents.</li> <li>2. What a shame to waste an opportunity to make North Charleston more liveable. The railyard could be moved South and this valuable land could be developed into restaurants, shops, bars- and add to the value of this city.</li> <li>3. Thank you for the opportunity to respond to the request to revise the Proposed Navy Base Intermodal Facility. As a property and business owner on upper Meeting Street Road we are adamantly opposed to any additional rail traffic in this up and coming commercial corridor. We started making investments and improvements in this area many years ago and continue to work with the City of Charleston on progressive change along this corridor. Much work has been done at the city, county and community level to make this change a reality over the last few years. As I'm sure you are aware, this proposed increase in train traffic will stifle any future positive change along upper Meeting St. Rd. and is in direct</li> </ol> | <p><b>9</b></p>                |

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|       | <p>conflict with the goals of the Upper Peninsula Initiative that was just adopted by the City of Charleston.</p> <p>4. I want to thank you for taking the time to respond to people and business owners of Charleston in regards to the new proposal of the Navy Base Intermodal Facility. Like many Charlestonians, I love my city and understand that more people are moving here every day, which is starting to cause some congestion issues at times. Since many people are moving here it is causing jobs to grow, which is great for our community and economy. Many businesses have begun to move towards upper King and Meeting Streets. Because of laws within the city, businesses cannot build more than five stories and have started to move west to upper King and Meeting Streets. From what I understand the new rail proposal will also be moving this direction and crossing more roads than the current rail. This is only going to cause frustration with business owners and developers in the city that are trying to expand. The newly proposed rail line will cause more congestion in a city that is already struggling with transportation issues, flooding, and neighborhood parking. The city planners and officials are trying to solve the issues and better the city for the people that enjoy Charleston for what it is. A new rail that comes into the city's commercial district will only cause more congestion and frustration among citizens that already struggle with the issue. If you would, please consider what the City of Charleston has been working on for years so businesses can continue towards upper King and Meeting without the worry of any further city congestion.</p> <p>5. My name is [REDACTED], and I have investment property in the neighborhood and I'm very concerned about what's going on here. You're literally putting up a physical, visual, audible barrier to the waterfront. And what this neighborhood needs is grocery stores. It needs new development. It needs businesses. And there's a place for this, certainly, and I think it's further to the south closer in proximity to the actual port. There was a plan in place several years ago for the new American city as a grand plan, was a great plan. And, unfortunately, it was woefully mismanaged. And the vision is still there. And it's a shame to let something like this derail – excuse the pun -- that vision. As the previous speaker said, there is some of the most</p> |                                |

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|       | <p>beautiful land in the entire city right there. And to put a rail yard next to it is just a travesty. Thank you.</p> <p>6. ...we would like to get more input information on what's anticipated on the impact of this project as regards to its zoning and whether or not there is an anticipation of change from the residential zoning. It appears that we're transitioning from a neighborhood that's residential into an industrial complex.</p> <p>7. I am writing on behalf of [REDACTED], LLC to provide comments regarding the southern rail connection proposed for the ICTF in North Charleston. [REDACTED], LLC is the owner of an office building located at that same address. It has two tenants, [REDACTED], LLC, a law firm in Charleston, and [REDACTED], a nonprofit corporation. The building was constructed as part of the City of Charleston's revitalization effort for the area. At the time of construction, it was located in an economic development zone that was promoted by The City of Charleston and the federal government. [REDACTED], LLC is concerned about the negative impact the southern rail connection will have on the upper Meeting Street Road corridor. The offices at [REDACTED] were conceived and developed along with its neighbor, [REDACTED], as an incubator for future office buildings and other nonindustrial uses. The proposed southern rail connection likely will run through the jointly shared parking lot with [REDACTED] and destroy the revitalization purpose of the real estate project, which has been in the making for over 10 years, long before the southern rail connection was even discussed. Contrary to the permittee's description of the area involving the southern rail connection as an "industrial area," there are many offices, non-profits and other buildings that would be impacted by this proposed southern connection. It will likely result in the closure and/or relocation of several offices.</p> <p>8. The City of North Charleston has an undeniable history of supporting industry and commerce. At the same time, the city has a motto which states that North Charleston is striving to be a "great place to live, work, and play." The fulfillment of this motto requires a delicate balance between opportunities for industry and quality of life. The city has done a commendable job of being mindful of that balance—growing industry and</p> |                                |

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|                                  | <p>opportunity for industry while simultaneously pursuing green space, attractive and affordable housing, cultural and recreational opportunities, and diversity. Our family moved to the Park Circle area of North Charleston in 2010, and we truly have found North Charleston a great place live, work, and play. We appreciate the community feel of our neighborhoods, the opportunities to be involved in the community, and the ability to walk our kids to school and live a few miles from my husband's work. This is an environmentally responsible way to live as well as a healthy lifestyle for our family. This community is (unfortunately) unique in the Charleston area, as it is difficult to find places where residents can enjoy a high quality of life near their jobs. Neighborhoods like this should be encouraged and supported. They are good for the environment and good for building strong communities.</p> <p>9. Property Impacts: The southern loop will affect the daily routine of residents and businesses in regards to access and noise, and could very well affect property values in a negative way. In a letter addressed to Ms. Tina Hadden dated September 8, 2015, Palmetto Railways describes the new southern CSX loop in the following way: "This alignment travels through an industrial area ...." While the area has some existing industrial uses, it is witnessing significant mixed-use redevelopment and is zoned for a large amount of growth, density and a variety of urban uses. Significant private sector investments have been made in this area, many predicated on the current zoning designed to facilitate and encourage the area's transition from industrial to urban land uses. <b>(City of Charleston)</b></p> |                                |
| <p><b>Cultural Resources</b></p> | <ol style="list-style-type: none"> <li>1. Hall replacement in the tank farm area or Stromboli Corridor, closer to the impact communities.</li> <li>2. Pedestrian &amp; bicycle access to Riverfront Park for Chicora-Cherokee residents. Greenway with walking &amp; bicycle paths along earthen berm barrier along intermodal transfer facility.</li> <li>3. At the southern end of the base, will public access to the marina area be maintained/eased?</li> <li>4. Good evening. My name is [REDACTED]. I'm representing the Lowcountry Alliance for Model Communities and Charleston Research to Action Board. One of our concerns is Sterett Hall. So we wanted to make sure that -- we know that Sterett Hall is going to</li> </ol>   | <p><b>15</b></p>               |

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|       | <p>be impacted by this project, and we wanted to make sure that Sterett Hall is mitigated and a comparable facility is located in the community where the community has access. And preferably the community prefer either the Tank Farm or the Stromboli Corridor for the location of the replacement facility.</p> <p><b>(LAMC/CCRAB)</b></p> <p>5. I believe that if we fail to teach our children history, what it means and what it costs to be an American, the democracy is in peril. In the Lowcountry, we're surrounded by history: Fort Moultrie, The Revolution, Fort Sumter. I don't think there could be a better monument, greatest generation, those three historic districts on the old Navy Base. Those buildings have 129 buildings that are on the national register or listed as contributing. It's the largest concentration of buildings like that in America waiting to be developed. Before that base even happened, though, in 1901, Congress appropriated money to buy that land. And what they bought were the remnants of three plantations. That land is all that's left -- Those plantations go back as far as 1672. The next plantation was 1682. And the third plantation was 1798. The names on those, some of which might be familiar to you, Middleton, Hayward, Wragg, Manigault, and some guy named Ball owned one of those plantations. That base started with one pier and one dry dock. And before it was over, it employed 28,000, 28,000 -- we think Boeing is big -- 28,000 people worked there. They gave their lives. I remember meeting a lady who one of the first things out of her mouth was her family had done 250 years in service on that base. It matters, it means something. We're 20 years removed from the closing of that base. And there are already people who don't yet know what happened out there, what will happen in 40 years or 50 years. All the effort those people made and gave will be lost to history. The people who came here from off, those military people brought with them their culture and it influenced Charleston. It gave us a culture that was different from the rest of the state. We owe a lot. This fine world-class city owes a lot, like most port cities, to the people who came here from all over. Our culture is at stake here, the memory of it. If a project is taken -- a project like this is undertaken, it touches me emotionally. And I know what's going to make your</p> |                                |

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|       | <p>decision is not going to be emotions. So I would advise, if you may, consider Section 4F of the 1996 Transportation Act, which says that a historic or wildlife area cannot be touched unless there's no reasonable or prudent alternative. There exists an alternative; that's that CSX route. If we talk about putting trains through that hospital district, you're looking at, as I understand it, one train equals 280 trucks. Thank you.</p> <p>6. There is a park right beside my house, Woodall Park. No one has even mentioned that. It is an absolutely beautiful park with mature, old oak trees. It really makes the area absolutely beautiful. And the train is propositioning to come straight through that park, tear down old oak trees that have been there for hundreds of years. No, go away. We don't want you. I don't know what else to say. I'm sorry. Thank you.</p> <p>7. The historic landscape that surrounds our property is being destroyed by this new proposal. Woodland Park located around the corner from our property will be mowed down. The landscape around us is home for different kinds of wildlife which we enjoy during the year. (One of which is a red fox along with the offspring.)</p> <p>8. When we purchased [REDACTED], I was intrigued for three reasons. The land provided ample space for my family and offered a decent living. The property was a perfect fit for our antique business as a second location. But, most importantly, owning a piece of American history was priceless. I personally worked on the restoration project for two years, and made sure the Quarters was restored to its original 1917 condition. Even though, it was our initial intention, we have never been able to implement business part of our plan due to dark rail cloud hovering above us at the Historic Navy Yard since our purchase. Our neighborhood has been experimenting the same negative effects as well.</p> <p>9. Access to current waterfront parks as well as river access in general: The environmental impact study needs to carefully assess how the plans for rail exiting the ICTF affect residents' ability to access and enjoy the waterfront of North Charleston both now and in the future. The current proposal for the ICTF, which calls for train traffic extending for miles north along the river, would cut off the residents of North Charleston from access to the river. North Charleston's extensive riverfront should be enjoyed as one of the city's</p> |                                |

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|       | <p>greatest assets, just as it is in other areas. For example, on the nearby peninsula of Daniel Island (the original site of the planned port), quiet boardwalks and parks line the rivers and marshes. Leading industrial cities across the nation have been realizing the immense impact that a human-focused waterfront can have on their communities. These cities have been reclaiming their waterfronts and experiencing the economic goldmine of an aesthetically-developed waterfront. The residents of North Charleston, in accepting a facility that will benefit individuals outside of the community financially, should not be denied access to one of their greatest natural resources. The two places that now exist for residents to enjoy the waterfront are Riverfront Park, located on the Old Navy Base, and Hendricks Park, along Virginia Avenue. The map of proposed rail traffic demonstrates that residents will be cut off from both of these parks—and from future utilization of riverfront properties—by trains exiting the ICTF. The current rail lines that exist along the river are not heavily used, and my family currently enjoys biking to both Riverfront Park and Hendricks Park. Crossing the rails with our children is not a problem as these rails are rarely used and the enjoyment of the parks is rarely interrupted by passing trains. Residents have been inadequately informed of just how much rail traffic would be going through these areas, not to mention that any current estimates could easily be surpassed if the port is successful (as developers are surely hoping it will be). In directing the rail traffic as it exits the ICTF, residents’ right to access their waterfront must not be denied. Solutions can be found that do not inhibit the residents of North Charleston from enjoying the current parks along the river and striving for an aesthetically pleasing riverfront for the future. Obviously, the port needs to be located on the river, but there is no necessity for rail traffic to be directed along the river at all.</p> <p>10. The proposal submitted by Palmetto Railways to construct a rail line that will bisect the Charleston Naval Hospital Historic District runs completely counter to the standards of the National Historic Preservation Act. Those standards, as explained by the Advisory Council on Historic Preservation, clearly state that any project that will "alter characteristics that qualify a property for inclusion in the National Register of Historic Properties</p> |                                |

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|       | <p>in a manner that would diminish the integrity of the property, that project is considered to have an adverse effect." "Integrity" is further defined as the ability of the property to convey its significance based on its location, design, setting, materials, workmanship, feeling and association. By every measure, the proposal violates each criteria. Further, the proposed construction of a transit train line is inconsistent with the Secretary of the Interior Standards for the Treatment of Historic Properties in that it (1) will create an inalterable change in the property's use or setting, (2) introduce incompatible visual, atmospheric and audible elements, and (3) result in deterioration of the historic value of the District. Specifically, the NHPA states that the government should "administer federally owned, administered, or controlled historic properties in a spirit of stewardship for the inspiration and benefit of present and future generations." 54 U.S.C. § 300101(3). Section 106 of the NHPA regulations state that the transfer or sale of a historic property out of federal ownership or control constitutes an adverse effect when undertaken without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance. 36 C.F.R. § 800.5(a)(2)(vii). Such a transfer/sale is required to include covenants that ensure adequate care which results in long-term preservation. Given that, the agreement which allows the State of South Carolina to administer the property must, by necessity, bind them to respect the historical character and integrity of the Historic District. A covenant to that effect must, by law, be included in the transfer documents between the federal and state governments. The above cited law also requires that consenting parties must consider "reasonably foreseeable effects" of such a transfer. That one participant in the agreement, the State of South Carolina, would propose to undertake a rail line through the Historic District, knowing at the time of transfer that it intended to build a port and a servicing rail facility, makes it both reasonable and foreseeable that additional rail access would be necessary. Therefore, such probability should have been included in the discussion and made part of the agreement. If it was neither disclosed nor agreed to then the transfer would be null and void. Before the issuance of any</p> |                                |

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|       | <p>permit, it must be determined if a Preservation Condition was made a part of any of the multiple transfers of ownership that have involved the Historic District. A close examination of applicable zoning and land use requirements of the responsible jurisdiction, in this case the City of North Charleston, and the scope of their enforceability is in order in that the proposed project will impact property outside the ownership of the State. In keeping with the National Park Service Guidelines for the Treatment of Cultural Landscapes, the property upon which the rail line is proposed to be constructed falls within the definition of: Historic Character; Historic Designed; Historic Vernacular; and Historic Site. The Historic Character is the sum of all visual aspects, features, materials, and spaces associated with a cultural landscape’s history. Historic Designed, a landscape that was consciously designed or laid out by a landscape architect, applies in that the Hospital District is an original remnant of the Chicora Park design as planned by the renowned Olmstead Brothers. Historic Vernacular, a landscape that evolved through use by the people whose activities or occupancy shaped it, is immediately obvious when one considers the effect that loss of the open space across which the trains would operate, will remove the mental and emotional healing effects such land would have upon surface and submarine sailors accustomed to the confined quarters of shipboard life. The value of the District as a Historic Site has already been ascribed by the placement of the buildings and property on the National Register out of respect and in memory of those who served and sacrificed for freedom and liberty. The Hospital District is but one of three contiguous National Historic Districts that contain a total of one-hundred and twenty-nine individually listed buildings. Together they tell a story that span the years from 1901 to 1996 and speaks of America’s evolution into a world power. The main hospital building was such an important WPA project that President Franklin Roosevelt visited twice to check on its progress. Ensign John Kennedy, while stationed in Charleston, was treated at the facility and Helen Keller stopped in to encourage wounded service members on her morale building tour. By virtue of its National Register status, the Charleston Naval Hospital Historic District qualifies</p> |                                |

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|       | <p>as a Section 4(f) property under the US Department of Transportation Act and, thereby, the presumption of preservation protection. A key requirement of Section 4(f) compliance is an attempt to show whether or not a property can be completely avoided while meeting the transportation need. It states further that when the proposal under consideration uses land from one or more Section 4(f) properties, alternatives that avoid each of the properties must be evaluated. When selecting an alternative the most important point to remember is if an avoidance alternative is determined to be feasible and prudent, if so, it must be selected. In submission of the proposal to construct a new rail line that in effect “takes” a Historic District, there has been a failure to consider what can only be described as the perfect feasible and prudent alternative. Completely outside the District, there is an existing CSX rail line that will satisfy the stated needs Palmetto Railways has put forth. By its very presence, such an option that meets the evaluation criteria requires that the permit request be denied. <b>(The Naval Order of the United States)</b></p> <p>11. I am writing to voice serious misgivings about the proposed plans for the Intermodal Container Transfer Facility (ICTF) which is being considered for the City of North Charleston. My concerns fall into three main categories: lack of dialogue with and respect for residents, pollution related to the ICTF and associated rail traffic (noise and air), and cutting residents off from current and future access to and enjoyment of waterfront lands in North Charleston.</p> <p>12. I have great concerns regarding the proposed container transfer facility in North Charleston and I feel that it would greatly diminish the quality of life the many people who call North Charleston home. As an avid fisherman the proposed rail yard and the increased traffic it would generate would cut off access to waterfront for this growing community to enjoy. I understand economic growth is needed however it cannot be at the expense of those who live work and play in North Charleston.</p> <p>13. Cultural Sites: I request that the Corps consider the project's impact on any community cultural facilities located within or in close proximity to the proposed ICTF, especially Sterrett Hall Recreation Center (located at the corner of 1530 7th Street and Hobson Avenue).</p> |                                |

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|       | <p>Sterrett Hall is a cultural resource for the affected community, featuring a 960-seat auditorium, a large reception hall, offices, meeting rooms, and a gymnasium fitted with basketball goals and a weight room. It is an iconic cultural asset and a popular meeting place for local residents and one of the few safe locations in the area for community sponsored and cultural events. Many residents have voiced their concerns regarding the destruction of Sterrett Hall at numerous previous public meetings. The previous settlement with the States Port Authority did not account for the loss of these cultural assets. Additionally, the revised ICTF plan has a northern component which traverses through the historically designated Naval Hospital District. Restoration of the Hospital is estimated to exceed \$25 million dollars. Mitigation of the loss of this historical asset could include contributions to the redevelopment of the Officers Housing Quarters and the Admirals House on the Former Base, including many of the most historic and architecturally important original structures on the Navy Base. The existing railroad corridors slice through the area making developing physical, cultural, and economic connections to other areas difficult. The area would be further divided by the proposed ICTF that would be a barrier to green/open space such as the Riverfront Park and Noisette Creek. As ██████████ ██████████ stated at the October 27 Scoping Meeting, "...some of the most beautiful land in the entire city' along the Cooper River will be cut off from the public if the (ICTF) plans are allowed to proceed." <b>(City of North Charleston)</b></p> <p>14. As you are well aware, the proposed construction and operation of an ICTF at the CNC requires the construction of a rail line which will intersect the Charleston Naval Hospital Historic District (the District), a National Register Historic District important for its national significance. The District lies just to the west of both the Charleston Navy Yard Historic District and the Charleston Navy Yard Officers' Quarters Historic District, also listed on the National Register of Historic Places at the national level of significance. In total, thirty-two structures from two eras of development, World War I and leading up to and through World War II, are listed as contributing to the District and can be</p> |                                |

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|       | <p>categorized in three groups: healthcare facilities located at the main hospital complex, service related buildings located to the east of the main hospital, and residential buildings mostly to the south and west of the hospital. These contributing structures represent a cohesive district with a high degree of integrity. In 2011, the District and the two adjacent historic districts became a focal point of PSC's Seven to Save program, which helps preserve vulnerable historic and cultural resources through education and public awareness. We have serious concerns about the proposed path for the rail line, as it requires the demolition of some contributing structures and will directly impact many others. This diminution of the integrity of the District, which serves as an important cultural resource, will be a considerable detriment to the human environment on and around the CNC. <b>(Preservation Society of Charleston)</b></p> <p>15. Historic Charleston Foundation is deeply concerned by the proposed Navy Base Intermodal Transfer Facility project. The proposed project threatens to demolish a significant portion of the Charleston Naval Hospital Historic District, which would result in an irreparable loss of the District's integrity. The proposed project would also inflict adverse effects upon two additional National Register Historic Districts, the Charleston Navy Yard Officer's Quarters Historic District and the Charleston Navy Yard Historic District. The project further proposes to demolish a significant number of private residences and permanently degrade the quality of life for a significant number of North Charleston's citizens. This scale of damage is simply unacceptable; a better alternative than the proposed project must exist. The Corps is required by NEPA to consider "[t]he degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources." Corps regulations further reinforce the need to consider historic properties in the Section 10 permitting process, requiring the Corps as part of "public interest review" consider " ... probable impacts, including cumulative impacts" to " ... historic properties." Corps regulations require that when permitting actions the Corps seek to avoid adverse effects upon historic properties:</p> |                                |

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|       | <p>Full evaluation of the general public interest requires that due consideration be given to the effect which the proposed structure or activity may have on values such as those associated with historic properties and National Landmarks “and such other areas as may be established under federal or state law for similar and related purposes .... [A]ction on permit applications should, insofar as possible, be consistent with, and avoid significant adverse effects on the values or purposes for which those classifications, controls, or policies were established.”</p> <p>The Corps is also encouraged by the NHPA “ ... to coordinate compliance with section 1 06 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their section 1 06 responsibilities as early as possible in the NEPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner.” Historic Charleston Foundation eagerly awaits the initiation of the Section 106 review process in connection with the proposed Navy Base Intermodal Transfer Facility project, and we formally request to be involved as a consulting party.</p> <p>Pursuant to the current NEPA public scoping process, Historic Charleston Foundation comments that the proposed project will have significant adverse effects upon both the human environment and upon three historic districts listed on the National Register of Historic Places. Most severe will be the effect upon the Charleston Naval Hospital Historic District. The following is a list of contributing buildings to the Charleston Naval Hospital Historic District that the proposed project plans to demolish:</p> <p>1463 Avenue H (Building 762/ Building P-2) Ca. 1937 two story single-family residence built as housing for pharmacy officers.</p> <p>1451 Avenue H (Building 763/ Building P-1) Ca. 1937 two story single-family residence built as housing for pharmacy officers.</p> <p>1350 Avenue H (Building KK-JJ) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> |                                |

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|       | <p>1293 Avenue H (Building DD-EE) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> <p>The Navy Base Intermodal Transfer Facility project proposes to run rail lines on a path directly through these buildings, necessitating their demolition. The proposed rail lines will also pass within a few feet of the feet of the following buildings, all contributors to the Charleston Naval Hospital Historic District:</p> <p>1795 Avenue F (Building 758/Building NH65) Ca. 1942 home of the Commanding Officer of the Naval Hospital.</p> <p>1801 Avenue F (Building 759/Building NH64) Ca. 1942 medical officer's quarters.</p> <p>1849 Avenue F (Building 760/Quarters 2) Ca. 1917 dwelling.</p> <p>1804 Marine Avenue (Building M-5) Ca. 1942 residence for naval officers.</p> <p>1761 &amp; 1775 Commissary street (Building M6-M7) Ca. 1942 duplex dwelling.</p> <p>1304 Avenue H (Building II-HH) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> <p>1288 Avenue H (Building FF-GG) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> <p>1345 Avenue G (Building LL-AA/ Building D-AA) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> <p>1311 Avenue G (Building BB-CC) Ca. 1941 duplex designed as medical officer's quarters by Charleston architect Douglas Ellington.</p> <p>1690 Turnbull Avenue (NH45) Ca. 1940-1942 Hospital Administrative Building, centerpiece of the main hospital complex.</p> <p>11.1690 Avenue H (NH46) Ca. 1940-1942 Subsistence Building, part of the main hospital complex.</p> <p>1420 Avenue H (NH48) Ca. 1940-1942 Sick Officer's Quarters, part of the main hospital complex.</p> <p>2335 Avenue F (NH49) Ca. 1940-1942 Genito-Urinary Ward, part of the main hospital complex.</p> <p>1450 Avenue H (NH50) Ca. 1940-1942 Medical Ward, part of the main hospital complex.</p> <p>1460 Avenue H (NH52) Ca. 1940-1942 Neuro-Psychiatric Ward, part of the main hospital complex.</p> |                                |

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|       | <p>1470 Avenue H (NH54) Ca. 1940-1942 Contagious Ward, part of the main hospital complex.</p> <p>2325 Avenue F (NH47) Ca. 1940-1942 Surgical Ward and Emergency Room, part of the main hospital complex.</p> <p>2335 Avenue F (NH49) Ca. 1940-1942 EENT Ward and Dental Offices, part of the main hospital complex.</p> <p>2365 Avenue F (NH53) Ca. 1940-1942 Dependents Ward, part of the main hospital complex.</p> <p>These nineteen buildings are in close proximity to the proposed rail lines and will suffer direct adverse effects from the proposed project. Those that are not partially or wholly demolished during construction will be isolated from each other and subjected to vibrations from trains that will hasten their degradation. Train noise and inaccessibility caused by the rail lines will permanently preclude market-driven adaptive reuse of these buildings, dooming them to be left to demolition by neglect. In total, if the proposed plan is permitted, there will be severe direct adverse effects to 23 out of the Charleston Naval Hospital Historic District's 32 contributing structures.</p> <p>This scale of this adverse effect will compromise the integrity of the Charleston Naval Hospital Historic District to the point where it could be de-listed from the National Register. The significance of the Charleston Naval Hospital Historic District is derived from the facility in its totality rather than a collection of individual sites. The Naval Hospital was strikingly modern when it was built and represented multiple advancements in medicine and in the organization of the Navy's medical services that are reflected in the layout of the facility:</p> <p>“The new hospital was modern in every way. Its plan provided different medical specialties with their own distinct sections of the complex, a centralized subsistence building, a consolidated administration building and a central courtyard providing a recreation area and plenty of natural light to all areas of the buildings. The hospital provided state of the art equipment for all fields, including an operating suite, an x-ray department, and spaces and equipment for the emerging field of physiotherapy and rehabilitation.”</p> <p>These advancements in medical care contributed to the United States' victory in World War II, and the Charleston Naval Hospital Historic District was listed on the National Register in recognition of the importance</p> |                                |

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|       | <p>of these advancements. The demolition and isolation of buildings that represent these advancements will destroy their ability to communicate this significance. The loss of the association between the buildings represents a fatal adverse effect to the District.</p> <p>NEPA, the NHPA, and Corps regulations contain a melange of provisions requiring that prior to permitting a proposed action that will result in adverse effects to historic properties alternatives must be considered. Historic Charleston Foundation hereby requests that alternatives to the proposed project be studied and considered prior to its permitting by the Corps. Any project that proposes to destroy the integrity of a National Register Historic District simply cannot be the best option. Previous alternative routes have been proposed and withdrawn for reasons that do not weigh equally in gravity to the destruction of a National Register Historic District. Numerous tragic examples exist of the destruction of our nation's cultural heritage for the sake of economic gains that proved to be temporary and regrettable. Please do not allow the Charleston Naval Hospital Historic District to fall victim to short-sightedness.</p> <p>The proposed project will also result in adverse effects to the Charleston Navy Yard Historic District and the Charleston Navy Yard Officer's Quarters Historic District. Historic Charleston Foundation acknowledges that when all alternatives are evaluated, it may well be that providing rail service to the proposed intermodal facility necessitates the infliction of adverse effects upon the Charleston Navy Yard Historic District and the Charleston Navy Yard Officer's Quarters Historic District. Inevitabilities of this nature are why mitigation procedures and requirements exist under both the NEPA and NHPA, and we look forward to the opportunity to discuss potential mitigation strategies for the adverse effects to these districts with the Corps and the permit applicant.</p> <p>The adverse effects caused by this project to the human environment are no less of a concern to Historic Charleston Foundation than the effects upon historic resources. We urge the Corps to listen to the many people who will have their quality of life significantly harmed by the permitting of this project as presently designed. Well thought out plans to create thriving</p> |                                |

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|                                 | <p>communities in and around the Navy Base have been put forth in recent years, clearly demonstrating the market's intentions for the site absent the interference of the proposed project. We know that the permit applicant has made great efforts to reach out to the community; we hope that they will also make great efforts to ensure that the area that they propose to adversely affect is able to survive and flourish after the completion of their project.</p> <p>In summary, Historic Charleston Foundation strongly urges the Corps not to allow the destruction of the Charleston Naval Hospital Historic District via the permitting of the proposed project. We eagerly await the initiation of the Section 106 process in connection with the proposed project and reiterate our desire to be included as a consulting party. We also wish the Corps to consider the adverse effects the proposed project would inflict upon the Charleston Navy Yard Officer's Quarters Historic District and the Charleston Navy Yard Historic District. If these adverse effects should prove inevitable, we look forward to working with the permit applicant and the Corps towards equitable mitigation. We finally ask that the Corps thoroughly and thoughtfully consider the concerns of the many neighbors who will be directly affected by the proposed project. We thank you for your time and consideration in this matter. <b>(Historic Charleston Foundation)</b></p> |                                |
| <p><b>Health and Safety</b></p> | <ol style="list-style-type: none"> <li>1. This premise set forth is important because the changes you propose create a very high probability in creating substantial delays to “first responders” and other emergency personnel in the support of our area (Meeting Street Road, north of Milford and south of Tuxbury Lane) cut off by the rail crossing.</li> <li>2. My concerns are the environmental &amp; health impact that the proximity of this Facility will have on me over the years.</li> <li>3. Health Impact Assessment needs to occur. Zero diesel emissions while containers are off-loading/loading.</li> <li>4. Let us now turn to other safety concerns. On multiple occasions and with great difficulty, we have contacted CSX about engines left running and unattended next to our building. The noise and diesel fumes emitted are stifling. The level of plausible deniability when addressing this and other matters with CSX has given rise to letters being sent to the company Chairman.</li> </ol>  | <p><b>21</b></p>               |

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|       | <ol style="list-style-type: none"> <li>5. Besides the impact of the new Rail Road on the water, the noise and the vibration impact on house foundation, what about the impact of "Pollution"? Smokes, diesel gas impact on residents &amp; to health in the short or long term basis. Is there any kind of compensation or other arrangements in view for residents that may be affected: Lung cancer for example.</li> <li>6. It is a safety issue</li> <li>7. Thirdly, we are concerned about the negative health outcomes that this project is going to have on the community, particularly Chicora-Cherokee, Union Heights, Accabee and Rosemont. What we are looking for the Corps of Engineers to assess in the EIS is what we have been told is a health impact assessment, so we would like to see that included in the EIS. And this particular study has been done in Baltimore, so they have a study that was done in Baltimore with the health impact assessment. <b>(LAMC/CRAB)</b></li> <li>8. With that in mind, I would also point out that the fire station would be the other side of these trains. Thank you.</li> <li>9. And as [REDACTED] has talked about, the air issue. I have a property right here on Clements Avenue, and it is evident that there will be some health issue. So it is in my understanding that it can be pretty easy to deal with property in terms of compensation paid for the piece of property. You have people to move away and so on and so forth. But in term of a health issue, the impact of gas and all those different things that [REDACTED] has already spoken about, how the company will be able to assess the impact of a health issue long-term or short-term on those residents in this community, including myself. You see, I know you cannot answer the question. But I'm just saying that, you know, it has to be taken in consideration, the short-term – the short- or long-term impact on people's health and how to assess it and to mix the proper arrangement of compensation on those people as time goes by.</li> <li>10. I notice that on that map where it shows where North Carolina ends near Remount, I didn't see that there was anything mentioned about the fire station and what happens there if the fire station is going to stay there or go away. You know, it has to go some place.</li> <li>11. Palmetto Rail's idea of removing the sections of the fence built by Navy is not functional because the fence</li> </ol> |                                |

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|       | <p>protects us from the crime in our neighborhood. My family has not experienced any crime because of the fence and any approach jeopardizing our security is not acceptable.</p> <p>12. Links to childhood asthma and the development of cancer have both been found for individuals living in close proximity to rail tracks. I fear the needs of the railroad are being placed before the safety of the children my wife and i plan to have.</p> <p>13. We also have concerns for the safety of our employees, many of whom utilize the public transit system and walk each day from the intersection of North Meeting Street and Pittsburgh Avenue to our location. Additional rail lines and traffic will only increase the possibility of injury or fatality as these valued employees make their way to work each day. In addition to the added risk associated with the commute, we have significant concerns regarding the ability of emergency vehicles to access our site in the event of a medical or property emergency. We request that the impact to our business, the safety of our employees, and the concerns of other businesses around us be considered carefully prior to finalizing plans for the rail expansion. Should you have any questions or need additional information, please don't hesitate to call.</p> <p>14. The tracks we have directly to the back of us, also draws loitering when the train cars are parked, which is always a concern to us as an office of all women. We hope that you consider this when making the decision about the new Southern Rail Connection.</p> <p>15. With no practical, nearby traffic routing alternatives for the southern rail connection, such as at the other existing crossing, which happens to be located near an existing railroad right-of-way where a similar connection could be utilized, the southern rail connection will affect not just quality of life and the economic interests of businesses, but also raise fire, safety and security issues due to delayed response times inherent with a lack of alternative routes nearby.</p> <p>16. Our biggest concern is the safety of our employees at our repair yard facility. Our employees work 6-7 days per week at our yard. If an incident occurred, it could delay any needed medical response.</p> <p>17. Concerned About: NOISE!! Train horns, vibration affecting elevated homes, echo cross creek, lower</p> |                                |

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|       | <p>property values, pollution from trains crossing over tidal creeks, fish, birds, other animals living in creek, poison seafood caught from community dock, safety (train accidents), air pollution.</p> <p>18. My company's terminal access is via Herbert Street, which already is hindered by existing crossings. The addition of new rail right-of-ways and at-grade crossings will certainly be detrimental to our operation. We have permanent tenants and per project occupants at our facility who depend upon convenient, safe, 24-hour access to Shipyard Creek. This past year we had over 150 employees of various dredging contractors parking and working out of our yard. The possibility of trains blocking access to or from the terminal not only poses a safety risk, but also devalues our property in terms of one of its highest and best uses. I urge you to review the Southern Rail Connection as proposed, and to deny it, unless alternate routing can be found which guaranties unimpeded access to the businesses in the Southern Rail Connection corridor.</p> <p>19. The proposed ICTF will undoubtedly result in a heavy increase in both train and truck traffic. This increased traffic poses a safety hazard for local residents, the majority of who travel by bike or on foot. It is estimated that some housing developments will feel the effects of traffic ten folds, as they are cut off from road access by the proposed train tracks. Residents in these areas could easily be isolated from emergency and delivery services and other community resources if a train or other vehicle is blocking access to their homes. <b>(City of North Charleston)</b></p> <p>20. There are several elderly folks living on Four Mile lane and these traffic blockages caused by rail traffic will prevent emergency responders from being able to serve these folks should the need arise.</p> <p>21. Mobility and Access Restrictions: A new at-grade rail crossing on Meeting Street will significantly impair movement in the entire City of Charleston as Meeting Street is a major north-south thoroughfare. Both emergency access and routine resident and business access will be compromised by the current southern loop alignment, and will result in heavy delays and unsafe blockages on a daily basis. Fire Station #9 is located on the corner of Heriot Street and King Street. The Fire Department has major concerns about its</p> |                                |

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|                    | potential response times due to these blockages. <b>(City of Charleston)</b>   |                                |
| <b>Air Quality</b> | <ol style="list-style-type: none"> <li>1. Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting our ability to gain access to our business. These traffic jams would contain (among other such type vehicles) sewage trucks emitting repugnant odors while they are stalled in gaining access to the North Charleston Sewer plant whose routes have been cut off by the crossing.</li> <li>2. A fourth concern of ours is the continuing monitoring of noise, air, vibration in the community. Particularly the air, we would like to see in the monitoring black carbon, particulate matter, both PM2.5 and PM10, sulfur dioxides, metals, nitrogen oxides, volatile organic compounds, carbon monoxide and polycyclic aromatic hydrocarbons. Our fifth concern is the reduction in diesel emissions. We would like an analysis of zero to near zero technologies to reduce the diesel emissions from this project, which to include all the equipment on the facility: Trucks, trains, cranes, switch engines, line-haul locomotives and yard equipment... And lastly, we would like an accurate forecast of future truck and locomotive volumes, projected emissions from future trucks, locomotives and yard equipment, monitoring near the roadways for air pollution, and evaluation of zero to near zero technology cost analysis benefit. Thank you. <b>(LAMC/CRAB)</b></li> <li>3. My name is [REDACTED], and I have property and our business on Meeting Street right at [REDACTED]. And what I haven't heard tonight is -- I'd like to phrase it as off-balance sheet, meaning many times they bring the trains and park them next to our building, leave them running unattended and the fumes come in the building.</li> <li>4. I live on The Navy Yard at [REDACTED]. We use our historic house for our business located in downtown Charleston, and we also live on the property as well. In our opinion, under the new proposal, these new structural and environmental changes being forced upon residents of Navy Yard and its surrounding neighborhoods are not acceptable and should not be implemented for the following reasons. Upon the implementation of this project, switcher and line haul</li> </ol> | <b>8</b>                       |

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|       | <p>locomotives will be passing by or idling during the sectional hook ups or cold days right behind our house. Most of the locomotives being used today produce an average of 68 pounds of pollutants per hour. My family and I along with our pets, on daily basis, will be exposed to these low quality diesel fuel emissions at aforementioned rate. Also, our property exterior will be covered with soot like most of the downtown homes due to cruise ship idling at the Charleston port. In addition, my wife is an asthma patient. Diminished air quality is going to affect her health more than anyone in our family. Currently, we are not experiencing any problems with air quality.</p> <p>5. Finally we are concerned with a substantial increase in fumes, noise and vibrations caused by longer and more frequent intermodal trains and the potential of delays with switching activities at the southern tail Connection. The offices at [REDACTED] were constructed next to railroad tracks that primarily carry short trains for local industries. Such short trains take relatively little time to pass by; utilizing fewer locomotives and minimizing vibrations. But they also occasionally stop and idle, emitting constant noise and noxious fumes. The trains proposed for the southern rail connection will stretch well over one mile in length with additional locomotives, taking more time to pass and resulting in more noise, vibrations and fumes.</p> <p>6. I am writing to voice serious misgivings about the proposed plans for the Intermodal Container Transfer Facility (ICTF) which is being considered for the City of North Charleston. My concerns fall into three main categories: lack of dialogue with and respect for residents, pollution related to the ICTF and associated rail traffic (noise and air), and cutting residents off from current and future access to and enjoyment of waterfront lands in North Charleston.</p> <p>7. Concerned About: NOISE!! Train horns, vibration affecting elevated homes, echo cross creek, lower property values, pollution from trains crossing over tidal creeks, fish, birds, other animals living in creek, poison seafood caught from community dock, safety (train accidents), air pollution.</p> <p>8. Pollution/Air Quality: Diesel powered locomotives emit a number of pollutants including fine particulate matter (PM2.5), oxides of nitrogen (NOx), hydrocarbon (HC),</p> |                                |

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|                                  | <p>carbon monoxide (CO), and compounds designated as hazardous air pollutants by the U.S. Environmental Protection Agency (EPA). Although more stringent federal standards will go into effect for locomotive engines over the next few years, in-use locomotives will continue to emit large amounts of pollution for the near future, absent further control measures. In addition, locomotive engines are under-regulated relative to other mobile sources of air pollution. I would urge the Corps to study a variety of cost-effective emissions control measures that would achieve significant reductions in this sector. The locomotive fleet in and around North Charleston includes line-haul freight and switch locomotives. The City is proposing that the Corps include in its EIS study an assessment of reducing locomotive and switcher emissions by retiring and/or replacing pre-Tier 2 diesel locomotives with state-of-the-art emissions compliant locomotives, and replacing diesel locomotives with electric multiple-unit locomotives. SC Public Railways could also purchase hybrid switcher locomotives and use auto-shut off technologies to reduce emissions from switcher idling and to promote fuel efficiency. Strategies already in use by other states have reduced emissions by 40%. EPA has developed an emissions calculator to help truck carriers measure their particulate matter, NOx and CO2 and identify strategies to reduce harmful diesel emissions and track emissions performance on an annual basis. The Corps should analyze truck emission reductions if SC Public Railways instituted a truck replacement program that replaces older, dirtier trucks with cleaner, newer ones in an effort to reduce diesel pollution from port drayage trucks. Diesel pollution is linked to thousands of premature deaths, hundreds of thousands of asthma attacks and millions of lost workdays. <b>(City of North Charleston)</b></p> |                                |
| <p><b>Noise / Vibrations</b></p> | <p>1. We are residents in the Hunley Waters community which is located off of St. John's/O'hear Ave on Noisette Creek. We moved here last October and are frequently awakened nightly by the loud horns of the trains. The horns are usually heard from 1 am on. It's not unusual to be awakened and remain awake for several hours due to the noise. Half of our neighborhood backs up to Noisette Creek like our home does. The noise is amplified over the water. There are 36 homes in our</p>   | <p><b>28</b></p>               |

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|       | <p>neighborhood and we have talked to our neighbors, many who are having the same problem. What we don't need is more noise!!!! I am certainly not an engineer but I know there is a lot of industrial property on the old navy base that is not surrounded by homes that might be better utilized for this project. If more trains are brought closer to our neighborhood we will suffer not only in lost sleep but in lower home values. We live in some of the most expensive homes in the area and we worry that the financial impact on us could be significant as no one will want to live where they can't sleep!!</p> <ol style="list-style-type: none"> <li>2. More importantly, trains in the area already prove to be a nuisance as the noise has kept area residents up at night. Please, I beg you, do not follow through on this project!</li> <li>3. Concerned about noise and vibration levels within our neighborhood with how close the tracks would come to St. Johns Ave. Would any type of sound barrier be constructed to alleviate noise? How will it be determined if there will be any vibration issues?</li> <li>4. Please keep in mind not only the trains but the horns that they blow at each and every crossing. Two longs and a short or whatever but at 4 or 5 AM, it definitely ruins a night's sleep.</li> <li>5. 2. Quiet zones for the corridor between King &amp; Meeting Street.</li> <li>6. Questions regarding noise pollution at Hobson and Supply Street.</li> <li>7. Main concern is with noise and vibrations that I may hear and feel in my neighborhood. Bend in track that is closest to St. John's Ave is very close to my home. Curious to why this portion of track bends up toward St John's Ave and then dips back down to Noisette. If this ends up happening, could there be any consideration given to a sound barrier built along St. John's Ave. similar to what is done when a road project comes very close to residential areas?</li> <li>8. Need more information about sound barrier along St. John's.</li> <li>9. Very concern about the impact project will have on my existence school. The noise is my major concern.</li> <li>10. My biggest concerns with the project are the noises from the trains &amp; the blocking of roads. I know train horn blowing is federally regulated but with extra trains</li> </ol> |                                |

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|       | <p>on the route it will increase the noise. Palmetto railways should be concerned &amp; actively finding solutions to this major concern. In the town hall meeting Jeff passed the buck basically said it is not his job since it is federally regulated. The public's opinion should be high on his concern &amp; the public is concerned about the noise. Therefore it should be his concern!</p> <p>11. To what extent will the sound impact affect those close to the new rail route? People are concern with displacement of neighborhood. (Smalls)</p> <p>12. Sound/noise impacts along with truck traffic should be studied along Virginia Ave. Rail crossing @ Noisette Blvd. &amp; Virginia Ave. needs rail crossing arms along with making this a quiet zone. Quiet zone should extend further up Virginia Ave to where rail crosses Virginia Ave where rail is close to Olde Village of North Charleston. Please do not allow idling trains to park on Virginia Ave. Thanks.</p> <p>13. Railroad quiet zones should be a mandatory requirement of the permit, if any, along the Virginia Avenue corridor. Train horn noise is extremely disruptive and there are residences within fifty feet of the existing tracks. There is no justification to claim that this is outside of the "footprint" of the project when train noise will so significantly affect the human environment and will be directly as a result of the rail yard. It is not the City's responsibility, it should be that of Palmetto Railways.</p> <p>14. We live on Noisette Creek and are concerned about noise (Hunley Waters)</p> <p>15. Curious about: noise barrier between St John Ave and Track near O'Hear, declining property values, pollution in the creek, and vibrations affecting elevated homes</p> <p>16. Thank you for this opportunity. My firm is located on North Meeting Street Road just north of Milford Street on the west side of Meeting Street Road. And we are alongside some of the existing tracks that have been referred to, and I can tell you from our own experience that trains do create a good bit of vibration. Therefore, we would like the EIS study to focus particularly on the effects of vibrations on surrounding businesses.</p> <p>17. Most of my concerns have been addressed by -- especially by [REDACTED] and the last couple that was here. But however, a lot has been said about the noise issue, you know, vibration and so on and so forth.</p> |                                |

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|       | <p>18. What I'm talking about now is, at 4:30 in the morning, they come by and they blow. So I would like to have a quiet zone there. I'm trying to sleep and it's just boom, boom, boom by. I'm not going to move unless something happens. And the railway track is not going to move. But I would appreciate it if you consider putting a quiet zone there, making a quiet zone. Thank you.</p> <p>19. I'm a teacher here in Charleston County, and I bought my home through a teacher program and am very grateful to have that opportunity to acquire the home. It's on Bexley Street. I did buy it at the time before when the original mega plan was in place, and it seemed like a potentially wonderful place to purchase a home. Back of my property does back right up to the railway track. And I didn't know what that's going to be like, but I thought, well, it was a reasonably priced home for a teacher. So – through this program. So I was very grateful for it. I can say that I can tell when it's a heavy train or a light train going by my house by the amount of vibration that goes on in the house. Sometimes it does feel like a UFO is coming from out of space and about to rip me off into outer space sometimes, you know. So I really have a concern about these extra weighted trains. That's a significant concern. And I expressed that really several years ago at the first meeting.</p> <p>20. Locomotives passing by or idling will add more noise pollution to our environment. Not limited to engine and track noise, squeaking from each railcar due to breaking and loud metal thud noises due to each railcar's couplers hitting each other will be heard during the pass. Moreover, horns will be used around my property because there is no quiet zone in our neighborhood. The Navy Yard north end crossing and the Virginia Ave. crossing will require the train horn to be used and will be heard loudly from our residence. Proposed earth and foliage noise barrier if built with 90 feet of dense vegetation on both sides of the rail tracks may reduce noise by five decibels if it is tall enough. Under the existing proposal, earth and vegetation planting would only serve as psychological relief, but not to physically lessen noise levels. Currently we are experiencing a distant horn noise and it is already disturbing enough and my family does not need to experience increased</p> |                                |

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|       | <p>levels of noise. Our house is built in 1917. At the distance these new tracks that are going to be built to our property, each pass ground vibration will be of discomfort in our life. This disturbing effect will also cause structural damage in a long run due to historical nature of the house. Currently, we are not experiencing any problems with our building's structure or with ground vibration.</p> <p>21. Also of concern to my wife and I are devaluation of our newly bought home and long-term structural damage from constant vibrations. There are not too many people willing to buy a house with train tracks essentially in the front yard. Horns and squealing metallic sounds at all hours don't make an easy sell. A well-built sound barrier that would add to the community rather than detract might help here. I do not know what could alleviate long-term structural damage, however.</p> <p>22. We have lived on Bexley Street near the intersection at Spruill avenue. The rail traffic has steadily increased since we moved in 2 years ago. We understood when we bought the house that having a train go by would be part of the neighborhood, but it has begun to affect our quality of life. The trains blow horns all hours of the night, despite it being a quiet zone. The trains alone are loud enough to wake us at 2 and 3 in the morning. The increased weight that the trains have been carrying is causing our house to shake to the point that the ceilings are beginning to fall in. Cracks run throughout the home, despite having a solid foundation... Please, PLEASE do not increase the rail traffic through residential areas. At the very least consider a sound barrier running the length of the line through residential districts.</p> <p>23. My wife and I are EXTREMELY concerned about the effect of (a) loud train horns sounding at night... We recognize that this project will bring an economic benefits to the state and the local area, and we support this aspect of the project. However, we believe that in return for the economic opportunities provided, the railroad companies should coordinate their operations to minimize their impact on the surrounding community by establishing Quiet Zones at all grade crossings in North Charleston (especially at North Rhett, South Rhett, East Montague (all crossings), Braddock, Spruill,</p> |                                |

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|       | <p>Virginia, and Attaway). Unfortunately, it is my understanding that CSX and Norfolk Southern are already violating existing agreements with the City of North Charleston to honor quiet hours and to avoid blocking roads during rush hour. My wife and I continually suffer from lack of sleep because train operators sound their horns for excessive lengths of time (sometimes 30 seconds continuously) at all hours of the night. Since these existing agreements are already being violated, I am distrustful of any verbal or written promises from Palmetto Railways that they will "do the right thing." I would STRONGLY urge the Army Corps of Engineers to require the establishment of legally binding, enforceable requirements that hold the railways accountable for their impacts on the surrounding community. Specifically, I would like to see noise meters installed at every grade crossing to continuously monitor (a) the volume and (b) the duration of all train horn soundings... On a regular, frequent basis, these records should be compared to mutually-agreed standards (agreed between City of North Charleston and the railways), and if the railways are in violation, they should pay a significant monetary fine (e.g., \$10,000 per violation) to the City. If there is a better way to handle enforcement, I am certainly open to hear it. I just want something to be done. I fear that the railway companies view themselves as above the law, and this public involvement process is one of our last opportunities as citizens to curb their harmful actions that are negatively affecting the neighboring community. Thanks for listening.</p> <p>24. Finally we are concerned with a substantial increase in fumes, noise and vibrations caused by longer and more frequent intermodal trains and the potential of delays with switching activities at the southern tail Connection. The offices at [REDACTED] were constructed next to railroad tracks that primarily carry short trains for local industries. Such short trains take relatively little time to pass by; utilizing fewer locomotives and minimizing vibrations. But they also occasionally stop and idle, emitting constant noise and noxious fumes. The trains proposed for the southern rail connection will stretch well over one mile in length with additional locomotives, taking more time to pass and resulting in more noise, vibrations and fumes.</p> |                                |

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|       | <p>25. In addition, because the premises we occupy is next to the railroad tracks, the existing short trains running on - the CSX line create only intermediate disruptions. However, the longer intermodal trains will cause excessive vibration for extended periods of time and interfere with our ability to work, and to conduct conferences with clients and other parties.</p> <p>26. I am writing to voice serious misgivings about the proposed plans for the Intermodal Container Transfer Facility (ICTF) which is being considered for the City of North Charleston. My concerns fall into three main categories: lack of dialogue with and respect for residents, pollution related to the ICTF and associated rail traffic (noise and air), and cutting residents off from current and future access to and enjoyment of waterfront lands in North Charleston.</p> <p>27. Concerned About: NOISE!! Train horns, vibration affecting elevated homes, echo cross creek, lower property values, pollution from trains crossing over tidal creeks, fish, birds, other animals living in creek, poison seafood caught from community dock, safety (train accidents), air pollution.</p> <p>28. Noise &amp; Vibration: The proposed ICTF plans place multiple tracks of railway immediately adjacent to environmental justice populations (as determined by EPA EJ Screener). During the scoping meetings, a number of residents shared their deteriorated health conditions resulting from cumulative environmental stressors such as vibration, air, noise, and light pollution. In 2008, CSX conducted a noise study in response to residents' complaints of the Wando Woods and Green Grove neighborhoods (within 60' from the closest track to 340' of the farthest track). In response, CSX requested an evaluation of the sound of the rail yard operations, and noise mitigation measures. Train switching has been performed in the yard area south of Dorchester Road over the past 40 years, and has increased within the past few years to support the growth in shipping at the Port. Car coupling, locomotive bells and horns, and non-CSX related sources such as trucks, produced most of the noise spikes. The residents were most concern with noise and vibration associated with switching activity during both nighttime and daytime periods and noticed that switcher locomotives were noisier than regular locomotives. The impact noise</p> |                                |

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|   | <p>during switching was of the greatest concern and the transport of wet pulp produce, from paper manufacturing, was attributed to the greatest levels of vibration. I request that the Corps investigate: 1. The expansion of the project area to that bounded by the Ashley River, Cooper River and Ashley Phosphate Road; 2. The condition of the direct, indirect and cumulative impacts of existing rail, ballast, and railroad ties to reduce vibrations associated with train movements both on and off-site; 3. Analyze the train speeds throughout the ICTF project area and adjacent intermodal yards to reinforce compliance with the non-mainline and mainline speed limits; and, 4. Minimizing train speeds during the switching operation to minimize coupling impact noise. 5. The establishment of enforceable Quiet Zone along all at grade crossings within the City Limits. SC Public Railways should establish a noise buffer area and noise barriers (such as earth berms) within SOD' of the ICTF and its feeder rail lines to provide noticeable reductions in various switching operation sounds to the nearest residences. <b>(City of North Charleston)</b></p>                               |   |
| <p><b>Aesthetics / Visual Resources</b></p> | <ol style="list-style-type: none"> <li>1. I purchased a home on Saint John's several months ago and love the quiet friendly atmosphere. I love walking through the streets of the old base. The new tracks will come within feet of my home. It will no longer be quiet, beautiful and safe at my home.</li> <li>2. FLETC remains concerned with the potential for noise and light pollution from the Navy Base Marine Container Terminal. <b>(FLETC)</b></li> <li>3. Will the landscape company gate for the wall that would buffer potential noises?</li> <li>4. Lastly, I have very deep concerns regarding CSX's level of commitment to this area. I challenge anyone to compare the track conditions next to our facility. At our facility facing south, the tracks to the far right are maintained by Southern Railways. The two sets of tracks to the left, maintained by CSX. The stark comparison is quite revealing. When looking more closely, the comparison (or better stated – absence of commitment) is more noticeable by the level of trash discarded by their staff on and about the track. This issue cannot be denied because the water containers we have documented are issued by CSX.</li> </ol> | <p style="text-align: center;"><b>7</b></p> |

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|  | <ol style="list-style-type: none"> <li>5. We've registered our vote against the railroad that will go directly in front of our property. We will no longer be able to have our children's events in the front area, as well as additional parking for our volunteers and guests. The railroad will be not only an eye sore but cause noise issues during business hours.</li> <li>6. In your study, what I don't understand is we're all going into this, in this honeymoon kind of rosy-eyed view, but the realistic point of view is it gets ugly down the road, even to the point where those creosote ties, they leave them mounded up. And as I heard earlier, no appreciation for the aesthetic elements of the community. So what I'd hope that you look at, too, are those hidden costs that we're going to have to expend when they come through with the rails. Anyhow, thank you.</li> <li>7. If I wanted to live next to a graffiti covered train, I would have bought a much cheaper property that was already next to an existing one. The historic old navy base has some of the most beautiful land and buildings in the city. There is so much potential for community growth &amp; history. This railyard would most certainly destroy it.</li> </ol>  |  |
| <p style="text-align: center;"><b>Traffic /<br/>Transportation</b></p> | <ol style="list-style-type: none"> <li>1. We are also concerned about how this plan will affect traffic. While we understand trains are necessary, we spend a lot of time in traffic waiting for them to pass. We are frequently waiting on Spruill Ave.as trains pass since the O'Hear bridge has been closed and under construction since September 2014. We are looking forward to the opening of the new bridge next month. However, it is our understanding that the Spruill Ave. bridge is being replaced next and will be closed for a year as well. That closure compiled with train line construction could make entrance and egress virtually impossible for us. We hope that you will consider the impact this plan will have on the residents of Hunley Waters and St. John's Ave. as you move forward.</li> <li>2. It has been brought to our attention of a proposed new rail connection. The project would result in containers well over a mile long. It would traverse over a new railroad crossing that would block Meeting Street, Herbert Street, Cherry Hill Lane and Pittsburg Avenue. The present railway has already been causing major traffic issues for our area. This would also include the inability for vendors to enter or exit from our property. Our much needed taxis on the roads of the Tri-County</li> </ol> | <p style="text-align: center;"><b>26</b></p> |

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|       | <p>are many times held up because of the train travel. It has created a safety issue as well being only feet from our front door. I see this present problem only being exacerbated by this proposed additional Southern Rail Connection.</p> <ol style="list-style-type: none"> <li>3. As owner of commercial property located at [REDACTED], I offer the following reasons for my objection to the proposed rail access: 1. More traffic congestion; 2. Inability to get to my business location in a timely manner - [REDACTED] - Over 20 taxi cabs moving in and out of this location daily.</li> <li>4. Our challenge faced would be access to eastbound roadways when rail traffic (locally referred to as the "car" train) crossed and paused on Meeting Street at Cunnington Avenue. The train is so long that it will also block the crossover from Meeting Street to King Street at Discher Street. Alternative accesses to eastbound roadways would be available at the Cosgrove and I-26 interchange or the newly constructed interchange on the old Naval Base Viaduct Road. The timing delay associated with this rerouting is 15 minutes in very light traffic conditions. Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting our ability to gain access to our business. Our security division needs ready access to roadways in which to service the multiple security alarm systems services in the Lowcountry.</li> <li>5. As property and business owners who support this project overall, we must make comment about the multiple at grade crossings from the southern access. There are multiple commercial and industrial businesses that will be negatively affected by trains stopped/crossing the roadway. There is no doubt a high demand for services and we expect to see lots of usage. Being able to get employees, customers and materials to our place of business is of the highest priority. We service and sell all types port related activities and being able to respond immediately is what we do. We feel that the current version of the southern access will negatively affect our business by limiting access due to the at-grade crossings.</li> <li>6. North Rhett Avenue is at capacity during going to work hours in the morning and going home times in the afternoon and it is only going to get worse because that</li> </ol> |                                |

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|       | <p>road is the cut-through that connects Mt. Pleasant, Charleston, West Ashley, North Charleston, Dorchester/Montague Ave. and Goose Creek/Moncks Corner areas.</p> <p>7. Road blocking is another big concern with this project. Traffic is already issue in the Charleston area. Having more trains blocking the roads for longer periods of time will not help that it can be a safety concern for those neighborhoods &amp; roads being blocked off. Is it possible to have limited times that trains can cross? Maybe not allowing cross during rush hours like 7:30 am - 9:00 am &amp; 5:00 pm - 6:00 pm.</p> <p>8. Thank you for the opportunity to respond to the request to revise the Proposed Navy Base Intermodal Facility. As a catalyst for inclusive community engagement in the Upper Peninsula, [REDACTED] is intimately involved in the footprint that this proposal adversely affects. Based at [REDACTED], [REDACTED]'s reach spans from Huger St. to Spruill Ave. As a result, we stand with our neighbors and are opposed to any additional rail crossings along Meeting Street Road. Additionally, current infrastructure needs should be addressed before impact is increased. Residential cut--throughs have become an inadequate solution to increased vehicular volume and increased frustration of the existing trains' schedule. There is no place for pedestrians and cyclists to safely cross over tracks, and existing tracks are currently poorly maintained. The proposed revisions will amplify the already challenging train traffic, and work to further physically fragment the community. We need to work together to create a plan that is beneficial to the existing community and allows for future and successful development of the Upper Peninsula of Charleston and the southern end of North Charleston. These revisions are not the answer. Once again, [REDACTED] stands opposed.</p> <p>9. There are current infrastructure needs in the area that should be addressed prior to any consideration of additional impacts. Rerouting of the existing lines should be studied for this part of the Charleston peninsula. The low volume of train traffic that currently exists already has a negative impact on the community at large and any increase will further fragment this fragile community. Currently there are no adequate crossings for pedestrians and bicycles and no</p> |                                |

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|       | <p>consideration has been shown to make any improvements. Increased vehicular congestion, due to an additional rail line, is not something the city or this community is interested in seeing.</p> <p>10. Thank you for the opportunity to respond -- I am against your proposal. My opposition is against ANY additional rail crossings on Meeting Street Road south of the Meeting Street &amp; Spruill Ave intersection for reasons set forth below. Access to eastbound roadways when rail traffic (locally referred to as the "car" train) crosses and pauses on Meeting Street at Cunnington Avenue is detrimental. The train is so long that it will also block the crossover from Meeting Street to King Street at Discher Street. Alternative accesses to eastbound roadways would be available at the Cosgrove and I-26 interchange or the newly constructed interchange on the old Naval Base Viaduct Road. The timing delay associated with this rerouting is 15 minutes in very light traffic conditions. The changes you propose create substantial delays to "first responders" and other emergency personnel in the support of our area (Meeting Street Road, north of Milford and south of Tuxbury Lane) cut off by the rail crossing. I live in the area that would be cut off and find this unacceptable. Additionally, the #6 Southern Rail Crossing as the primary access to the Intermodal Container Transfer Facility would create traffic jams at our property inhibiting my ability to gain access to my residence.</p> <p>11. In addition, because of our location, we have experience with existing trains that already cross Meeting Street Road further down by Magnolia Cemetery. In particular, the trains I'm most familiar with are what we call the BMW trains. And these are very long, and because of the speed limits, they take quite awhile to traverse the grade crossing. Right now what occurs is you see dozens, and depending on the amount of traffic, sometimes hundreds of cars turning around and seeking alternative routes. For example, there is access to I-26 at Spruill Avenue. Well, that's going away. So if we throw in an additional grade crossing, which presumably will have more trains on it than what we are seeing even presently running down to the Columbus Street terminal, the alternatives will be quite limited because the Spruill Avenue access is going to be limited. And the only option that I'm seeing is going all the way</p> |                                |

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|       | <p>up to Cosgrove Avenue, which implicates -- for example, I live in West Ashley. If I'm going home, now we're talking about effects on people that live off of Sam Rittenberg Boulevard because I would use the North Bridge, or possibly looping up through the Naval Base and using the new port access road. So we think that in light of the fact that there has been focus on the burdens existing already on Interstate 26 and how important it is to try to alleviate traffic there, we have to remember Meeting Street Road is the only egress off of the peninsula that is not single lane other than I-26. And we are talking about tying that up even more with these additional trains.</p> <p>12. My name is [REDACTED]. And as the lady just spoke about the railroad track, I live by the railroad track. But when I bought my house, I was so happy to get the property that I didn't think nothing about the track. But now, just like the gentleman just said, the train comes by – I live in Accabee, and the train comes by and they stay on the track. We only have three -- we have three ways out. But if they block both ways, we only have one way out and that's on Azalea Drive.</p> <p>13. Other concerns that my family and I worry about include traffic patterns, as a train parked on Virginia would stress an already at capacity N Rhett in the morning, and Riverfront Park becoming cut off as trains become more frequent.</p> <p>14. Rail line traffic jams cause stuck trains on both the Bexley line as well as the one crossing North Rhett on a daily basis.</p> <p>15. There is great concern regarding the blockage these crossings create to traffic on Meeting Street. But, I am even more alarmed that the blockage could prevent my customers/vendors from accessing and being serviced by [REDACTED] Inc.</p> <p>16. My wife and I are EXTREMELY concerned about the effect of... (b) trains blocking major roads during rush hour... we believe that in return for the economic opportunities provided, the railroad companies should coordinate their operations to minimize their impact on the surrounding community by not blocking roads during rush hours (7-8am and 5-6pm Monday through Friday)... it is my understanding that CSX and Norfolk Southern are already violating existing agreements with the City of North Charleston to... avoid blocking roads</p> |                                |

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|       | <p>during rush hour. There should also be cameras to record (c) the time and (d) the duration of street closures at grade crossings.</p> <p>17. Beyond the regular 10-15 minute delay experienced with each train that crosses Pittsburgh Avenue, we have experienced at least 2 road blockages in the past 12 months that have lasted hours and meant the costly shut down of our operation. Increased traffic will only increase the number of regular delays that interrupt our process and increase the likelihood of delays that would leave us idle for the day.</p> <p>18. We are writing as a business on [REDACTED]. Our business is already affected by the train due to the road being blocked when it is passing by during business hours. We often times have traffic backed all the way up to our business and down the road when that happens (sometimes right around the 4:30 or rush hour traffic times). Sometimes this happens more than once a day and we are in a part of the road that we cannot always “race” to beat the train to get out of the blockage.</p> <p>19. Vehicular traffic is also a major concern. Interstate 26 is already overburdened, and the southern rail connection at its proposed location would create an additional crossing on the only secondary, multilane vehicular access up and down peninsular Charleston. With a track train speed limit of less than 10 miles an hour, longer duration train crossings and more frequent disruptions of vehicular traffic will occur. Long trains bound for the port currently proceed at well below 10 mph as they cross Meeting Street at an existing crossing to the south of the southern rail connection. These port bound trains often come to a dead stop and occupy the existing crossing for significant periods of time. There is no legally enforceable way to prevent similar long-duration occupations at an additional crossing on Meeting Street Road after it is permitted.</p> <p>20. Our law firm is involved with maritime issues, and often responds to the investigation of marine accidents and appearances in Court. We are concerned regarding the length of container trains that would occupy Meeting Street Road for extended periods of time, greatly limiting our access to downtown and East of the Cooper. Our access is already directly impacted by the closure of the Spruill Street exit and entrance which is proposed for the new terminal truck access. Additional impacts by</p> |                                |

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|       | <p>extended rail delays on Meeting Street Road will therefore greatly exacerbate the effect of the dedicated truck access.</p> <p>21. Our property is accessed off of Meeting Street Extension via Cherry Hill Lane. This access is already disrupted by existing rail traffic. There are three (3) rail crossings on Cherry Hill Lane before it terminates into Meeting Street Extension about 1,000 feet away. In fact, we have experienced delays of as much as three hours due to rail traffic blocking Cherry Hill Lane and Pittsburgh Avenue. Naturally such interruptions are costly, and pose a huge safety risk.</p> <p>22. [REDACTED] is a local dredging company that engages in marine contracting and is located at [REDACTED]. Our employees have already encountered short trains that block Pittsburgh Avenue for over one hour. We have observed CSX crews on breaks where they have intentionally blocked Pittsburgh Avenue. Because Pittsburgh Avenue is the last street crossing before the proposed southern rail connection trains reaches the ICTF, it is inevitable that these longer container trains will block Pittsburgh Avenue for even longer periods of time. The past history of excessive street blocking does not bode well for the future, when trains are much longer and handled by the same CSX crews.</p> <p>23. My company's terminal access is via Herbert Street, which already is hindered by existing crossings. The addition of new rail right-of-ways and at-grade crossings will certainly be detrimental to our operation. We have permanent tenants and per project occupants at our facility who depend upon convenient, safe, 24-hour access to Shipyard Creek. This past year we had over 150 employees of various dredging contractors parking and working out of our yard. The possibility of trains blocking access to or from the terminal not only poses a safety risk, but also devalues our property in terms of one of its highest and best uses. I urge you to review the Southern Rail Connection as proposed, and to deny it, unless alternate routing can be found which guaranties unimpeded access to the businesses in the Southern Rail Connection corridor.</p> <p>24. Truck Traffic/Safe Routes to School: According to past data provided by the SCSA, approximately 23% of the containerized cargo from the North Charleston Port</p> |                                |

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|       | <p>Terminal would likely go to existing intermodal rail yards. The SCSA estimates that for year 2025 approximately 100,000 additional containers per year or 600 containers per day would be delivered to the existing CSX and Norfolk Southern (NS) intermodal facilities in North Charleston. The additional container volume would likely require both CSX and NS on average to add two trains per day to handle the increased traffic. Trains are built in Charleston and are carried to large intermodal railyards such as Atlanta, Jacksonville, or Charlotte. Since there are a limited number of train slots, intermodal trains may get longer in the future to accommodate increase in containerized cargo. Accordingly, there would be a total delay of approximately 9 minutes for the first vehicle in line for the at-grade crossing. Four at-grade rail crossings would be impacted by the increased number of trains per day for the increased intermodal rail freight resulting from the operation of the Proposed Project. The NS railway at-grade crossings at Taylor Street and Remount Road, both west of 1-26 and north of 1-526, would experience two additional trains per day and therefore would be blocked for an additional 18 minutes per day, 9 minutes per train, while the trains pass through the at-grade crossings. Two at-grade rail crossings for trains transporting intermodal freight on the CSX line would be impacted within the transportation study area. The CSX trains traveling north from east Bennett Yard would affect the at-grade crossings at Montague Avenue and Remount Road within the transportation study area. Additional NS at-grade crossings north of the transportation study area that would be impacted by the two additional trains per day are located at Aviation Avenue, Jet Park Road, Midland Park Road, and Ashley Phosphate Road. The City is proposing that the Corps evaluate the negative economic and emergency management impacts resulting from blocking crossings for an additional 18 minutes per day. The study's traffic model should reflect the reduction of capacity on adjacent arterials at peak hour at the blocked crossings and nearby intersections when vehicles detour to avoid waiting. The study should analyze conditions around institutional areas (schools, places of worship, libraries, etc.) and other activities to improve safety and accessibility, and reduce</p> |                                |

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|  | <p>pedestrian/vehicular/truck/rail traffic conflicts. <b>(City of North Charleston)</b></p> <p>25. There is already one railroad crossing on Meeting Street and Cherry Hill Lane literally feet from my building. This crossing causes traffic to stop in front of my building and backs ups preventing people from entering or leaving my property. This traffic stoppage can take up to thirty minutes at a time. Numerous times over the years I have had freight shipments delayed because delivery trucks could not access my building. It also prevents people from leaving or entering Four Mile Lane, a small residential street next to my property.</p> <p>26. Mobility and Access Restrictions: A new at-grade rail crossing on Meeting Street will significantly impair movement in the entire City of Charleston as Meeting Street is a major north-south thoroughfare. Both emergency access and routine resident and business access will be compromised by the current southern loop alignment, and will result in heavy delays and unsafe blockages on a daily basis. Fire Station #9 is located on the corner of Heriot Street and King Street. The Fire Department has major concerns about its potential response times due to these blockages. <b>(City of Charleston)</b></p> |                                |
| <p><b>Environmental Justice / Protection of Children</b></p> | <ol style="list-style-type: none"> <li>1. I am a private citizen, my property was purchased solely for residential use, even though its zoned for dual purposes, both residential and commercial. I have two small children, ages 5 and 7. The presence of these stakes, and their implications are of grave concern to me and my young family.</li> <li>2. The impact of industrial growth of such magnitude in this community will be considerable and lasting. Every effort should be made to ensure that the residents of these communities are not at all adversely effected without plans (firm plans) for mitigation which make the communities WHOLE. The surrounding communities of this project are all Environmental Justice communities. CCRAB (Charleston Community Research to Action Board) expects to be a full and continuous partner and participant, contributing equally to the outcomes and impacts created by the installation and operation of the new Charleston Port.</li> <li>3. "...an internal railyard is likely to have substantial impacts on existing transportation infrastructure and the adjacent community that extend well beyond the</li> </ol>   | <p><b>8</b></p>                |

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|       | <p>scope of the impacts evaluated in the EIS for the port facility and access road..." Tina Hadden November 13, 2008. I agreed with the Regulatory Chief then and I hope her position has not changed as this project will have severe impacts on the surrounding environmental justice communities.</p> <ol style="list-style-type: none"> <li>4. Kids attend 1 of several schools off of St Johns and play in the streets. The decision to lay track here would negatively affect the Noisette community's youth as a whole.</li> <li>5. The use of EPA's EJ Screen to establish a consistent and transparent approach for identifying potential communities with environmental justice concerns.</li> <li>6. The Intermodal Container Transfer Facility (ICTF) is essential to the economic viability of the Charleston area and I strongly support the project. Presently, the environmental justice concerns regarding the ICTF Draft Revision prepared by Palmetto Railways have not been addressed... Another commitment of the Port of Charleston EIS was the allocation of four million dollars for environmental justice programs... In closing, I am completely in favor of the ICTF but if USACE Charleston is seriously interested in honoring the commitment for environmental justice, changes to the existing plan must be made. I sincerely believe in the future of this project and of the Charleston community. I would be happy to participate in any way to ensure that this project is completed in such a manner to benefit everyone affected.</li> <li>7. The State Ports Authority had originally planned to build on the south end of Daniel Island. However, the residents of the relatively new, affluent development on Daniel Island successfully fought having the port built on their peninsula. The State Ports Authority relocated their plans across the river to North Charleston, and the port and related industry are now threatening the more established but less economically advantaged neighborhoods there. My family used to live on Daniel Island and while we enjoyed our time there, we have found a home in North Charleston—a unique place where diversity exists and is trying to thrive—racial diversity, economic diversity, and diversity of land use. Industry exists alongside residential areas and people feel a sense of community because they do “live, work, and play” here. The Environmental Protection Agency</li> </ol> |                                |

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|                      | <p>states that environmental justice “will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.” I am writing in the hope that people with consciences will consider issues of environmental justice and how to preserve the special balance that exists in North Charleston and not allow a unique and established community to be “railroaded” for the sake of economic gain.</p> <p>8. Social Impact Assessment/Neighborhood Cohesion: The City of North Charleston's motto is a great place to live, work and play. Unfortunately, the development of the ICTF will alter the ways in the adjacent EJ community lives, works, and plays, relate to one another, and generally cope as members of the city. The Corps should investigate the social consequences that are likely to follow from the ICTF project development. The surrounding EJ community has specific environmental justice concerns, and as such, enhanced analysis efforts require the development of more advanced analytical methodologies and extensive and targeted engagement of residents. Such factors include identifying unique exposure pathways, assessing physical infrastructure conflicts, and as noted previously, multiple stressors resulting from cumulative impacts. The LAMC Neighborhood Revitalization Plan and the Neck Area Master Plan were both completed within recent years. The plans include research, analysis and recommendations for addressing a host of issues that affect this community. The cumulative effects of industries that have located near the LAMC study area over the last 50 years have dramatically affected the overall quality of life. Heavy industrial uses in close proximity to residential uses are viewed negatively by residential developers and homeowners. <b>(City of North Charleston)</b></p> |                                |
| <b>Water Quality</b> | <p>1. Concerned About: NOISE!! Train horns, vibration affecting elevated homes, echo cross creek, lower property values, pollution from trains crossing over tidal creeks, fish, birds, other animals living in creek, poison seafood caught from community dock, safety (train accidents), air pollution.</p>  | <b>1</b>                       |

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| <p style="text-align: center;"><b>Flooding / Sea Level Rise</b></p> | <ol style="list-style-type: none"> <li>1. In addition to concerns already raised I am concerned that the increased height of the ground build- up for the facility will adversely affect drainage &amp; flooding in Chicora/Cherokee.</li> <li>2. Hello, and thank you so much for holding these meetings. I feel the best way to mitigate the impact of hurricane surge and storm-water runoff is tidal marshes, a good natural creek and inland water system and basically trees. There's a lot of issues that I don't see in the construction of the new project that's really addressing some of the recent issues that we've had not only from a runoff but also tidal surges. After the recent rain event a few weeks ago, I went out and scoped some of the railways. I live in the Park Circle area. Our main issue was the North Rhett and the rail connection that crosses North Rhett under 526. You look at the railway rail lines. You also look at the deep ditch and berm construction of railways. And I've lived on Bexley Street for some time so I got to see how that system worked when we had severe storms. And the construction of the bridges, especially across Filbin and Noisette Creeks. I guess my comment is that I would like to see that the bridges -- and the new bridges, as well as the old bridges that cross Filbin as well as Noisette Creek -- really be constructed in a way that is forward thinking that allows for potential higher tides, at the same time does not constrict runoff as we've recently seen, as well as not allowing for the increase of access of tidal surges up along the deep ditch system and rail design as it is currently or as it's proposed.</li> <li>3. Natural disasters such as the recent floods have also played a role in the decline of property values. The LAMC study area is particularly at risk because of existing floodplains in the area and the pervasive need for drainage improvements. The Corps should investigate the indirect, direct and cumulative flooding risks such as impacts on the elevations within the floodplain, retention/detention and water quality calculations and upstream/downstream flooding problems to the safety and welfare of the public and the potential damage to public and private property and the cost of building construction. The elimination of wetland assets may exasperate this condition as well. To date the City has not seen or been presented with a</li> </ol> | <p style="text-align: center;"><b>3</b></p> |

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|  | comprehensive drainage plan for the ICTF. <b>(City of North Charleston)</b>   |                                |
| <b>Waters of the U.S.</b>                | <ol style="list-style-type: none"> <li>1. Concerned about the environmental impact on the marsh area surrounding Noisette Creek.</li> <li>2. Another negative is that it will destroy Wetlands that are needed in so many ways environmentally. The original plans were better and there is no need to change what everyone had grown to live with. We know the rails are going through but you do not need to displace homeowners and destroy wetlands.</li> </ol>   | <b>2</b>                       |
| <b>Wildlife</b>                          | <ol style="list-style-type: none"> <li>1. Concerned About: NOISE!! Train horns, vibration affecting elevated homes, echo cross creek, lower property values, pollution from trains crossing over tidal creeks, fish, birds, other animals living in creek, poison seafood caught from community dock, safety (train accidents), air pollution.</li> </ol>   | <b>1</b>                       |
| <b>Threatened and Endangered Species</b> | <ol style="list-style-type: none"> <li>1. Right Whale Stations: Right whales are the rarest of the large whales and the waters of the coast of South Carolina are deemed a "critical habitat" for right whale calving grounds. The critically endangered species sightings are dependent upon private reports. A shore-based volunteer network siting station is located within the ICTF footprint. The Corps should investigate ICTF impacts to this station and propose alternative locations. <b>(City of North Charleston)</b></li> </ol>   | <b>1</b>                       |
| <b>Mitigation</b>                        | <ol style="list-style-type: none"> <li>1. And we would like to see and hear that there are plans being made for the assistance of residents in relocating to maintain their quality of life without having to live near that close to an expanding industrial complex and have this done physically for assistance, assistance financially and assistance emotionally, and consideration of access to work when we consider how near the many of them are to the City of Charleston and to the jobs there.</li> <li>2. Yes, I'm also quite concerned because I'm on the north end where they've repositioned the track to come along Saint Johns. And I would like to get a lot more information of the distance from the neighborhoods, because it looks like it's really going to impact all those neighborhoods quite a bit along Saint Johns and O'hare Street and what kind of buffers that they will be using. I see buffers over at the CSX yard along Meeting Street that are little piled up dirt and some bushes, which is</li> </ol> | <b>16</b>                      |

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|       | <p>not sufficient to take care of our neighborhoods. So I would like more information on that, please.</p> <p>3. Knowing that this future plan may exist, we would like to propose an alternative to the area since we will be affected by the existence of the rail yard, particularly the excess noise and the change in the cosmetics of that area. What we'd like to see around our parcel or around the rail yard, to deter the noise and the appearance of that area, a construction of a brick wall. The wall should be high enough and dense enough to reduce some of the noise. The trees that they're proposing will not serve the adequate provision needed. It will only serve a separation between the community and the rail yard. Trees can be planted alongside the wall to complement the brick wall. We certainly hope that your organization will take into consideration our proposal. As a standing business leader and business owner close to 30 years in the Chicora-Cherokee community, we hope that you would consider our proposal and act on it. We trust that you would work with our corporation or other corporations in that area that has already contributed to the Chicora-Cherokee area to further develop North Charleston and that immediate community. And we wish to thank you for allowing us to speak.</p> <p>4. We own property at [REDACTED] that you have listed as Kephart. And the comments that were made relating to a wall and buffer of plants, we want to just state our support for that...</p> <p>5. We at [REDACTED] have just finished building a new Distribution Center costing \$425,00. We have been in business serving three counties, 68 agencies and 29 Title I schools and have abused children on our property for classes throughout the summer and winter. The railroad is within 100 feet of our property causing sound, smells, earthmoving and environmental effects on our much loved and needed buildings and mission. Please move the tracks further away from our building or build a large sound barrier or give us land that will equal or be better than what we have at the present. We have asked for one million to get land, build again and re-establish five separate buildings that we now own and operate out of. This is not a favorable location that has been selected and we would like to work with the railroad in pleasing everyone.</p> |                                |

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|       | <ol style="list-style-type: none"> <li>6. My property will likely be damaged. I had high hopes for the growth that the Saint Johns/Navy Base have potential to become. This railway will cause environmental &amp; noise damage, quality of life disturbances and financial burdens to those of us that live in the neighborhood. Why not just use the railway that already exists and is no longer in use (along Spruill, etc.)? Who is going to pay for the damage to my house and the decrease in property value in the beautiful Park Circle area?</li> <li>7. If I suffer any damages from the Navy Base's upcoming construction, who do I contact about redress of the damages suffered?</li> <li>8. If the southern rail connection is permitted to proceed, we ask that the ACE require mitigation by the permittee, consisting of road construction alongside the eastern portion of the railroad right-of-way, allowing truck access from Pittsburgh Avenue to Milford Street when trains occupy the track. Thank you for your attention to the above comments.</li> <li>9. Light, noise, and air pollution barriers placement should be emphasized to the public living nearby.</li> <li>10. Because of noise and it's travel, vibrations, the 100' buffer is not adequate for a better quality of life for resident that may have to reside after the railyard construction. Extend the buffering.</li> <li>11. The southern boundary of the ICTF is adjacent to Charleston Heights. I understand that the current plan is to build a ten foot landscaped berm to protect the residences in this community from noise generated by the facility. A height of ten feet is not adequate to protect the residents. I propose that the height of the proposed noise barrier needs to be increased.</li> <li>12. The second impact that we are concerned about is having the proper buffer between the community and the proposed project. So in our minds, we think that 500 feet is at a minimum is sufficient for vibration and noise and light. <b>(LAMC/CRAB)</b></li> <li>13. Based on the available information, the proposed project will result in the placement of fill material in waters of the U.S. and/or tidal marsh on the intermodal facility site and the offsite improvements. The Corps has published a Notice of Intent in the Federal Register on October 23, 2013. The project proposal indicates that fill material will be placed in waters of the United States</li> </ol> |                                |

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|       | <p>and tidally influenced wetlands (approximately six acres), including Noisette and Shipyard Creeks. In 2008, EPA and the U.S. Army Corps of Engineers jointly promulgated regulations revising and clarifying requirements regarding compensatory mitigation. Compensatory mitigation refers to the restoration, establishment, enhancement, and/or preservation of wetlands, streams, or other aquatic resources conducted specifically for the purpose of offsetting authorized impacts to these resources. The city requests that the Corps investigate the possibility of utilizing “permittee-responsible compensatory mitigation” (PRCM), the most traditional and popular method for carrying out mitigation projects. Under PRCM, the permittee has the responsibility to successfully complete any required mitigation projects, which can be located at or adjacent to the impact site or at another location generally within the same watershed. I request that the Corps choose a mitigation site in the immediate vicinity of the ICTF project. Noisette Creek, Filbin Creek or Quitmann's Marsh are viable candidates for mitigation in that they are currently, listed as impaired watersheds in great need of restoration. <b>(City of North Charleston)</b></p> <p>14. The current buffer is proposed to be 100' from the ICTF which I feel is inadequate to mitigate the effects of the new industrial development adjacent to the residential communities. To be effective, the barrier wall would need to be solid, contain no significant openings, be of sufficient mass, and extend in height and length to block the line-of-sight from the train locations to the residences. The wall(s) should also include space for adequate clearance and proper foundation and structure in order to withstand expected wind loads. The line of- sight between the ICTF to the receiver should be effectively broken. To accomplish even the 100' buffer, SC Public Railways would need to acquire a number of residential properties along the western boundary of the site which would disrupt neighborhood cohesion. In some instances it would require taking more than half of the homes on a given street. To mitigate this effect I propose that SC Public Railways acquire all of the residential property adjacent the proposed ICTF out to Spruill Avenue. Additionally, the Corps should analyze ground vibration associated with</p> |                                |

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|       | <p>direct, indirect and cumulative train movements. Although some vibrations may not be felt on the ground during testing or be of high enough magnitude to register as a threat to structural stability of existing buildings, many residents, especially those with older homes will notice that their windows and doors are effected by the vibration from rail transport. Although minor vibrations may not impact the community from a building stability standpoint, these nuisance vibrations can be most disruptive to the community's life, especially in the overnight hours. <b>(City of North Charleston)</b></p> <p>15. Additionally, the revised ITCF plan has a northern component which traverses through the historically designated Naval Hospital District. Restoration of the Hospital is estimated to exceed \$25 million dollars. Mitigation of the loss of this historical asset could include contributions to the redevelopment of the Officers Housing Quarters and the Admirals House on the Former Base, including many of the most historic and architecturally important original structures on the Navy Base. <b>(City of North Charleston)</b></p> <p>16. Alternatively, in the event a suitable new location cannot be identified for the southern rail loop, the City requests that the rail be modified to reduce the severity of its impacts by incorporating mitigation measures designed to help preserve and protect the areas in the City of Charleston and its residents who will be negatively impacted by the project. Mitigation measures could include: 1) The extension of Hamlon Street to Cherry Hill Lane would create access for parcels which are circumscribed in the rail loop when trains are present. 2) The elevation of Meeting Street at the railroad crossing as a viaduct road would allow most emergency and routine vehicular access to continue uninterrupted. 3) The addition of at least two at-grade vehicular crossings over the existing rail corridor between King Street and Meeting Street would allow traffic flowing north the ability to use the King Street corridor should a train be blocking traffic at that location. 4) The arrangement of the Mount Pleasant Street/King Street/Meeting Street/Morrison Drive intersection could be reworked to allow for traffic to seamlessly move north on King Street. 5) King Street could be improved to accommodate the increased</p> |                                |

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|                                  | <p>traffic demands and emergency access abilities of Fire Station #9 on Heriot Street that will otherwise be compromised. 6) The connection of Sewanee Road to the Port Access Road would ensure an access route to 1-26 that otherwise will be taken away with the new rail crossing. 7) Provide acceptable replacement land for the City's Public Service Operations Center (and restitution for additional leased property) currently planned to be located on the City's parcel at Herbert and Harmon Streets. <b>(City of Charleston)</b></p>  |                                |
| <p><b>Cumulative Impacts</b></p> | <ol style="list-style-type: none"> <li>1. The Southern Rail Connection involves CSX cargo to travel south toward the City of Charleston, loop around, and then connect to an existing CSX rail easement. During this process, the trains would block traffic along Meeting Street. Palmetto Rails indicates that this route would affect fewer residences for a lower net impact on people. Despite the alleged lower net impact on people, the cumulative impact in the form of vibration, air quality, noise, and transit ingress egress to the Union Heights neighborhood will have a disproportionate effect on the quality of life for this community. This impact is caused when considering the both the additional trucks on the proposed Port Access Road to the south and CSX Rail cargo passing on both the northeast and southwest.</li> <li>2. I request that the Corps carefully consider all direct, indirect and cumulative negative environmental, cultural and historical impacts that will affect the citizens living in the ICTF project impact area with emphasis on those outlined above. If additional information is needed or you have any questions, please contact my office. Thank you for the opportunity to submit comments. <b>(City of North Charleston)</b></li> </ol> | <p><b>2</b></p>                |