



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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JUL 07 2016

U.S. Army Corps of Engineers
Charleston District Regulatory Division
69A Hagood Avenue
Charleston, South Carolina 29403

Attention: Lieutenant Colonel Matthew Luzzatto

Re: Draft Environmental Impact Statement for the Proposed Navy Base Intermodal Container Transfer Facility, North Charleston, South Carolina, CEQ# 20160087

Dear Lieutenant Colonel Luzzatto:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Navy Base Intermodal Container Transfer Facility (ICTF) developed by the U.S. Army Corps of Engineers (USACE), Charleston District, using a third-party contracting process as described in 40 CFR §1506.5. The DEIS was initiated because the USACE has received an application for a Department of the Army permit under Section 404 of the Clean Water Act (CWA) from Palmetto Railways (SAC 2012-00960). The EPA notes that these comments are limited to the NEPA review and not intended to be review comments on the Section 404 CWA permit. Palmetto Railways proposes to construct a 130-acre ICTF at the former Charleston Naval Complex (CNC) to facilitate the transfer of international cargo containers between ships/trucks and rail (e.g., trains). The Proposed Project, also referred to as the Navy Base ICTF, would provide equal access to the Class I rail carriers (CSX Transportation (CSX) and Norfolk Southern Railway (NS)) that serve the Port of Charleston (Port) and various local businesses and industries. The proposed facility would be designed to accommodate existing and projected future intermodal container traffic within the region. The off-site infrastructure improvements would include building: (1) a private drayage road approximately 1 mile long connecting the ICTF to the Hugh K. Leatherman, Sr. Terminal (HLT), (2) rail improvements to the north and south of the ICTF, and (3) several roadway improvements and modifications, including the construction of a new overpass.

The EPA previously provided scoping comments on December 30, 2013. On January 27, 2014, the USACE requested that the EPA participate as a cooperating agency in the development of the DEIS and on February 25, 2014, we accepted the invitation. The Federal Railroad Administration (FRA) also accepted the USACE's invitation to become a cooperating agency. As a cooperating agency, we participated in numerous meetings, conference calls and public meetings and the EPA appreciates the collaborative approach the USACE has taken during the development of the DEIS. The EPA has enclosed detailed comments on the DEIS (See enclosure).

The USACE used a three tiered screening process and considered the location of the ICTF in 12 different locations. After the screening process, two sites were considered for further study, which included the Applicant's Proposed Alternative and a site north of the Applicant's Proposed Alternative

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called the River Center Site. From these two ICTF site locations, the USACE formulated eight alternatives (i.e., seven action alternatives and the no action alternative) that was moved forward for further consideration. The USACE has not identified a preferred alternative in the DEIS citing the regulatory and pre-decisional nature of the Section 404 permitting process. It is anticipated that the USACE will identify the preferred alternative in the NEPA Record of Decision (ROD) and the Section 404 CWA Statement of Finding.

As noted above, the EPA acknowledges the collaborative efforts of the USACE during the development of the DEIS. The EPA acknowledges the USACE's receptiveness to conducting appropriate levels of air quality modeling needed to properly consider air quality impacts associated with the proposed project. The EPA also commends the USACE for conducting a Health Risk Assessment that disclosed potential health impacts associated with the proposed project. The EPA does have several environmental concerns related to noise and vibration, cultural resources and environmental justice as noted in the enclosed detailed comments.

The USACE did not identify a preferred alternative in the DEIS. Therefore, the EPA has rated all of the Action Alternatives (Alternatives 1-7) within the DEIS as "EC-2", indicating that we have environmental concerns with all of the Action Alternatives with additional information requested for a final document. The EPA rates the No Action Alternative as a "LO" indicating we have a general lack of objections.

The EPA appreciates the opportunity to provide comments on the proposed Navy Base ICTF and looks forward to working with you to address our concerns. If you have any questions regarding our comments, please contact Ms. Jamie Higgins, of my staff, at (404) 562-9681, or by e-mail at Higgins.jamie@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alan Farmer". The signature is written in a cursive, flowing style.

G. Alan Farmer
Director
Resource Conservation and Restoration Division

Enclosure: EPA's Detailed Comments

Enclosure
EPA Detail Comments
Navy Base Intermodal Container Transfer Facility (ICTF)
Draft Environmental Impact Statement (DEIS)
CEQ No.: 20160087

Background Information:

- On page 1-18 (Section 1.5.1), the USACE discusses the background information regarding the proposed project. On Page 1-19, line 523, the USACE discusses the 2006 Final EIS Proposed Marine Container Terminal at the Charleston Naval Complex. However, the USACE did not disclose the litigation and subsequent settlement agreement with community groups.

Recommendation: The EPA recommends the USACE elaborate on any previous litigation or settlement agreements related to previous 404 permits within the vicinity of the current project.

Alternatives Analysis:

- On page 2-5, the USACE lists “owned by Palmetto Railways” as a screening criterion. The EPA is concerned that this criterion greatly narrows the array of potential viable alternatives. In CEQ’s 40 NEPA FAQs (Question 2a), the CEQ addresses the need for evaluating alternatives outside what is considered “reasonable” by the applicant (see below):

Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

Recommendation: The EPA recommends the USACE better explain why “owned by Palmetto Railways” should be a considered as a specific screening criterion.

Environmental Consequences:

Overall

- Throughout Chapter 4, the environmental consequences are determined by comparing the No Action Alternative (usually defined as the 2038 build out) and the Action Alternatives. However, there is no comparison to the existing condition or baseline. Predicting the nature of conditions 20 plus years in the future can be speculative; however, determining the existing or baseline condition should be easily determined and the public can better understand the comparison of the existing conditions when compared to potential action alternatives.

Recommendation: When applicable, the EPA recommends the USACE compare the existing condition, No Action and Action Alternatives so the public and resource agencies can better understand the potential impacts of future actions.

- The EPA acknowledges the USACE providing a summary table with descriptive impacts comparing action alternatives to the no action alternative. However, actual data would be

meaningful in order to understand differences in each alternatives impacts when compared to the existing condition, No Action and each Action Alternative (including the proposed project).

Recommendation: The EPA recommends that the USACE provide a summary table with meaningful, quantitative data for each impact section that compares the existing condition, Acton Alternative (including proposed project) and No Action Alternative.

Water Quality

- On page 4-25, the USACE states that there would be no change to salinity under the No Action Alternative. The EPA believes that the USACE should consider the future impacts of the USACE and South Carolina Port Authority (SCPA) Charleston Harbor expansion project Post 45's impacts on salinity.

Recommendation: The EPA recommends that the USACE discuss any salinity changes due to Post 45 or better explain how there would be no changes in salinity under the No Action Alternative.

- On page 4-28 and page 4-88, the USACE discusses construction of stormwater detention ponds and their locations.

Recommendation: The EPA recommends the use green infrastructure design techniques and sustainable concepts when designing these stormwater detention ponds. The EPA also recommends that the USACE illustrate what these detention ponds would look like with pictures or drawings within the FEIS.

- On page 4-45, the USACE discusses various mitigation measures for water quality; however, there is no mention of using sustainability design concepts or green infrastructure. Green infrastructure can more naturally reduce pollutants entering waterways.

Recommendation: The EPA encourages the USACE to consider utilization of green infrastructure when designing stormwater treatment facilities and sediment and erosion structure.

Traffic:

- On page 4-118, Impact Definitions, the USACE discusses the Level of Service (LOS) definitions used to describe traffic impacts. However, this paragraph does not provide an explanation as to the Federal Highway Administration's (FHWA) definition of LOS A-F.

Recommendation: The EPA recommends that the USACE better explain the FHWA's established definitions and methodology of establishing LOSs for surface transportation projects within the FEIS.

- Throughout 4.8 Traffic and Transportation (starting on page 4-120, Table 4.8-2), the USACE describes impacts in terms of "segments". However, the USACE does not provide a definition or methodology of how these segments were determined.

Recommendation: The delineation of these segments can impact the statistical nature of the LOS and the EPA recommends that the USACE explain the rationale for these segments delineation in the FEIS.

Cultural Resources:

- On page 4-235, the USACE acknowledges the adverse impacts to the Charleston Naval Hospital District (CNH) and states:

Under Alternative 1 (Proposed Project), the CNH Historic District and the USMC Barracks would be affected. The northern rail link would extend through the CNH historic district and through the parade ground of the USMC Barracks, creating an adverse effect to these historic properties. The construction of the northern rail link would require the demolition and removal of multiple buildings associated with the CNH historic district, creating long-term, adverse impacts to this district. Elements of the CNH would be removed, destroying the associations that exist between the various elements.

The EPA notes that Alternative 2 uses the existing CSX right of way (ROW) and would avoid significant impacts to these historic properties. The EPA also notes that there was considerable concern expressed at the DEIS public hearing (May 24, 2016) regarding impacts to the CNH and the CNH historic district.

Recommendation: The EPA encourages the USACE and Palmetto Railways to explore avoidance measures to the CNH and historic district to include using the existing CSX ROW.

Noise and Vibration:

- On page 4-291, Table 4.12-8, the USACE comparatively describes traffic noise levels. The EPA is concerned that there is no discussion or comparison of Alternative 1 to the existing condition or baseline condition. It would be more meaningful for the public if the USACE discusses the existing condition in relationship to the future No Action Alternative and Alternative 1.

Recommendation: The EPA recommends that the USACE better explain this table and for disclosure purposes provide a column of data for the existing condition.

- On page 4-270, Table 4.12-9, the USACE comparatively displays rail noise. The EPA believes that there is not a sufficient discussion in the preceding paragraph explaining this table.

Recommendations: The EPA recommends that the USACE better describe this table and add a row that displays the dBA (A-weighted decibels) of the existing or baseline condition. Also, the EPA recommends that the USACE should compare Alternative 1 to the existing condition.

- Page 4-296, Table 4.12-10. The EPA believes that the graphic displays on 4-293 to 4-295 is a good visual display and helps explain noise impacts. How does this table compare with the No Action Alternative and existing condition? The EPA believes that it would be beneficial if this data was displayed in a table comparatively for each Action Alternative, the No Action Alternative and the existing condition or baseline. This information would be very meaningful and could provide a visual and understandable comparative graphic for the public and other stakeholders.

Recommendation: The EPA recommends that the USACE provide data regarding the existing condition and comparatively display this data in a table for each Action Alternative, the No Action Alternative and the existing condition.

- Page 4-296, 4.12.3.3 Rail Vibration. The EPA is concerned with the lack of discussion in the Rail Vibration section. The USACE states the rail vibration impacts are negligible without adequately justifying that position (or conclusion) in the Rail Vibration section. Additionally, the USACE makes the statement that: “Rail vibration effects would be unlikely for the 76 receptors analyzed”, but does not provide data or a rationale as to why the statement is accurate.

Recommendation: The EPA recommends that the USACE provide a more detailed, robust discussion regarding impacts of rail vibration and provide data that substantiates the claim of negligible impacts.

- Page 4-297, Table 4.12-11. Table 4.12-11 displays estimated noise impacts in terms of dBA, but does not provide a side-by-side comparison to the existing condition, No Action Alternative and other Action Alternatives. Also, the additive impacts associated with the combination of individual construction noise impacts are not considered especially at the ICTF where noise levels are concentrated. The EPA is concerned that this information is not evaluated and could be of great concern by local residents and the community.

Recommendation: The EPA recommends expanding Table 4.12-11 to display a side-by-side comparison to the existing condition, No Action Alternative and Action Alternatives. The EPA also recommends that the USACE evaluate the additive impacts of the combined construction activities especially at the ICTF construction site.

- Page 4-298, Table 4.12-12. The USACE discusses the proposed project’s noise levels for the nearest receivers. The EPA has the following concerns:
 - The EPA is concerned that the table does not display side-by-side comparisons of the existing condition (current ambient noise levels), No Action Alternative and other Action Alternatives. This side-by-side comparison is important to give the public an idea of the proposed project’s impacts when compared to existing conditions and other alternatives. Also, the USACE might consider displaying the FRA’s noise standards in a column for comparison purposes as well.
 - The EPA is concerned that other operational noises such as truck traffic, forklift noises, and other equipment are not reflected in this table.
 - The table does not reflect additive impacts associated with all the noises combined.

Recommendations: The EPA recommends that the USACE better describe the FRA’s noise standards and display the FRA’s noise standards within the table. For NEPA disclosure and transparency, the EPA also recommends that the USACE include additional columns that shows the FRA noise level standards (outlined in 49 CFR Part 210) and the existing condition, No Action Alternative and other Action Alternatives. The EPA recommends that the table reflect other truck traffic, forklift noises, and other equipment.

- Page 4-321, 4.12.10 Summary of Impacts Table. The EPA is concerned that the USACE does not adequately discuss the comparative noise and vibration impacts for each alternative especially the Baseline, No Action and Action Alternatives especially Alternative 1 (applicant’s alternative). For public disclosure and transparency, the EPA suggests that this section should go into greater detail regarding comparative advantages and disadvantages especially when compared to the proposed project, existing condition and No Action Alternative.

Recommendation: The EPA recommends that the USACE comparatively summarize and describe the environmental advantages and disadvantages regarding noise and vibration impacts especially in relationship to the proposed project, existing condition, No Action Alternative and Action Alternatives.

- Page 4-322, Table 4.12-24. As previously stated, the EPA is concerned that there is not a summary of the additive, combined noise impacts (especially for the ICTF) for each noise category (rail vibration, traffic noise, rail noise, construction noise and operations noise).

Recommendations: The EPA recommends that the USACE display data in dBA and VdB (Vibration decibels) to include the additive impacts of traffic and rail noise. For disclosure and transparency, the EPA also recommends that the USACE include an entry that displays the Baseline conditions regarding Table 4.12-24 in the FEIS.

- Page 4-299, Table 4.12.13. The USACE for the night time noise entry estimates noise to be 14 to 17 dBA, which is identified as major. The EPA notes that USACE does discuss these impacts on the following page (4-300). However, the EPA believes that the USACE should elaborate on these impacts since they have been identified as “major”. The EPA also believes that the USACE should discuss any minimization and mitigation measures to reduce these major impacts.

Recommendations: The EPA recommends that the USACE elaborate on these major noise impacts and discuss minimization and mitigation measures to reduce impacts. The EPA further recommends that the USACE consider implementing specific night time minimization and mitigation measures.

Air Quality:

- As a cooperating agency, the EPA provided technical assistance to the USACE as they conducted modeling and studies to determine the proposed project’s potential impacts to air quality and human health. The EPA appreciates these collaborative efforts and will continue to provide assistance to the USACE as needed as the proposed project moves forward through the NEPA process.

Climate Change:

- Overall, EPA acknowledges the detailed analysis of GHG emissions in the DEIS. However, there are other climate change related impacts that were not discussed in the DEIS. Specifically, the EPA notes that the USACE did not provide any level of analysis for sea level rise or increases in storm numbers, duration and intensity and potential impacts to the proposed project within Chapter 4 (Environmental Consequences). Additionally, there was no discussion regarding Climate Change Adaptation measures that might be implemented to harden the ICTF and related infrastructure to future climate changes events. Given the proposed projects close proximity to the ocean there is a high likelihood that climate change and sea level rise could potentially impact the project.

Recommendations: The EPA recommends climate change impacts to the proposed project such as sea level rise and storm increases in frequency and duration be discussed in the FEIS’s Chapter 4. As a part of this discussion, the EPA recommends that the USACE discuss possible impacts to the ICTF and related infrastructure such as flooding and potential hazardous waste

spills due to storm events. The EPA further recommends that the USACE discuss climate residency and/or adaption measures that could be implemented by Palmetto Railways.

- Page 4-400, Table 4.14.11 Summary of Impacts. As previous stated, the EPA appreciates the summary of impacts displayed at the end of each section. However, we believe that it would be more meaningful to also include the quantitative data. The EPA notes that this was done in Table 4.12-24 for the Summary of Impacts, Noise and Vibration on page 4-322.

Recommendation: The EPA recommends that the USACE also incorporate quantifiable data in Table 4.14.11.

Socioeconomics and Environmental Justice (EJ):

- **General Comments:** The EPA notes that a list of mitigation commitments were included in the executive summary. There are a few mitigation measures that address EJ issues. However, the DEIS indicates that a mitigation agreement to address environmental justice impacts or concerns is still being developed with the South Carolina Department of Health and Environment Control (SCDHEC) and the community. Based on our review, it is unclear when the agreement will be available for public review.

Recommendation: The EPA recommends that the USACE include the mitigation plan within the FEIS and be given an opportunity for public review and comment.

- **Socioeconomic/ EJ Demographics:** The DEIS includes U.S. Census 2010 and/the American Community Survey data for the demographics analysis and population trends; race, income, education, housing health and Limited English Proficiency. The project area contains large EJ populations (Section 3-16) and the DEIS generally provides a comprehensive analysis in depicting this information.
- Based on the Table 3.16-2, the project study area has experienced population loss over a 10-year timeframe unlike the City of North Charleston and other comparison groups. It appears that this proposed project may continue to exacerbate this trend. Section 4.16.3 *Community and Neighborhood Impacts* references the loss of housing in the neighborhood at approximately 6 percent, and its contribution to the trend of population loss in the neighborhood. However, no consideration is made to how noise impacts from trains or neighborhood aesthetics such as an increased number of cranes and containers may impact this general population trend. In addition, no mention is made in the DEIS to the reduction in neighborhood access points potentially impacting this population trend. Additionally, there is no proposed mitigation for the loss of affordable housing that is discussed in the DEIS.

Recommendation: The EPA recommends that the FEIS includes a discussion on how this project may or may not affect the population trend in the communities adjacent to the ICTF. The EPA also encourages Palmetto Railways to explore possible mitigation measures to offset the loss of affordable homes in the surrounding neighborhoods.

- **Impacts** –Impacts to communities with EJ concerns include potentially noise and vibration, air quality, economic issues, aesthetics, loss of affordable housing, mobility, access/safety and community cohesion and increased traffic impacts. The loss of facility space and community

resources is also potentially an issue of concern. The DEIS describes the intensity of the impacts to various communities.

Recommendation: The EPA recommends that the USACE better explain the loss of facility space and community resources in the FEIS and specifically describe any minimization and mitigation measures for these potential losses.

- **Relocations:** EJ communities, such as the Chicora–Cherokee neighborhoods, located immediately adjacent to the project site, will be directly impacted by the proposed site (documented throughout Section 4.16 of the DEIS). Approximately 106 relocations will be necessary from the Chicora neighborhood. Most of the homes are reported to be rented. The relocations constitute approximately 6% of the residents in the neighborhood, many of which will need to be relocated to other communities. The EPA notes it would be helpful to more fully describe impacts to residents that will be relocated and the community that will remain. The EPA also notes that the loss of affordable housing was raised as a concern by the South Carolina Loan Fund and other Non-government Organizations (NGOs) at a May 2016 Public Hearing.

Recommendation: The EPA recommends that the USACE more thoroughly describe the direct and indirect impacts associated with the proposed relocations. Specifically, the EPA recommends that the USACE better describe impacts from the proposed relocations in relation to the subsequent loss of affordable housing and the area’s housing stock. Further, the EPA recommends that the FEIS specifically describe any minimization and mitigation efforts considered to offset the loss of affordable housing.

- **Socioeconomic Impacts** - According to the DEIS, community resources of importance to the community will be affected by the proposed projects and replacements for those resources do not currently exist. In addition, the community is concerned about the proposed construction and operation of an industrial intermodal rail facility because it is inconsistent with local plans and recent investments in the area. The DEIS also notes that 120 people would be employed at the ICTF; however, the DEIS doesn’t discuss whether these jobs are temporary or permanent or the types of jobs. Additionally, the DEIS discusses the relocation of 5 businesses, but doesn’t discuss the numbers of jobs that will move with those jobs.

Recommendations: Overall, the EPA appreciates the efforts made by the USACE Charleston District and Palmetto’s Railway to identify and disclose potential impacts to communities within the vicinity of the project area. However, the EPA recommends that the USACE elaborate on the types of jobs potentially created by the ICTF (e.g., temporary or permanent and the types of jobs) in the FEIS. The EPA also recommends that the USACE elaborate in the FEIS on the types and numbers of jobs that are potentially being relocated away from the area.

- **Noise and Vibration** - Noise and vibration are impacts that will potentially affect populations with EJ concerns. According to the DEIS, moderate noise and vibration impacts will occur to the use of construction equipment, minor to moderate noise and vibrations impacts will occur due to train and crane operations, and negligible impacts will occur as a result of traffic, except on local roadways. Minor to moderate rail impacts would occur along certain segments from increased rail activity and new tracks and negligible rail vibrations would occur. The DEIS (3.12.4 Train Noise and Vibration) indicates that the ambient vibration levels with no trains present on the existing track exceed the typical background vibration levels of 5–60 VdB. The DEIS also

indicated that during the train pass (with no street traffic moving), the levels significantly exceeded the ambient condition.

Recommendations: The EPA recommends that the FEIS include a summary of the number of noise sites that would be impacted along with the magnitude of the impact across all of the alternatives for EJ populations. The EPA notes that the summary on noise and vibration includes the noise and vibration levels for each of the noise categories (i.e., Negligible, minor and moderate).

- **Mitigation/Monitoring Commitments:** The EPA understands that the noise and visual impacts will be a potential issue for residents located within the vicinity of the proposed project study area and that a landscaped earthen berm will be constructed to offset some of the impacts. Given the fact that the proposed ICTF site is in close proximity to communities including populations with historic EJ concerns, efforts should be made to monitor noise levels during construction and the operation of the facility to ensure that pre-construction noise modeling results and assumptions accurately reflect localized impacts to communities. Should the impacts exceed acceptable noise threshold conditions, monitoring and mitigation measures should be in place to appropriately and adaptively manage these impacts. This monitoring and mitigation assessment should include both noise and traffic effects. The EPA understands that community mitigation plans will be developed with the residents and other key stakeholders in an effort to identify the most effective mitigation measures for the residents affected. In addition, the EPA understands that a community engagement and awareness plan will be put in place to ensure that affected communities are informed of the projects ongoing status and projected impacts and are able to voice concerns or recommendations that they may have about the projected construction.

Recommendation: The EPA recommends the use of Community Advisory Groups to help ensure that appropriate and effective communication is maintained between the affected communities and Palmetto Railways/current owners through the life of the project. Additionally, the EPA recommends that a community engagement and awareness plan be included in the FEIS, even if it is in draft form. The FEIS should indicate an estimated timeframe and the parties responsible for ensuring the completion of the commitments described in Chapter 6 (i.e., Page 6-6). The EPA also recommends establishing a monitoring and adaptive management plan (especially for noise) to ensure model predictions were accurate and to improve upon mitigation measures, if necessary. The community engagement and awareness plan referenced in the DEIS resources area, *Socioeconomics and Environmental Justice*, of Table 6.1, indicates that the plan is included in Appendix B, but was omitted from Appendix B. Additionally, the EPA recommends that the USACE develop a robust monitoring and adaptive management plan for noise and vibration and document this commitment in the FEIS and the ROD.

- **NEPA Minimization and Mitigation** – The DEIS includes potential NEPA avoidance and minimization measures. The EPA notes that follow-up activities are needed for many of the proposed measures and that some of the measures are connected to previous commitments that are not yet complete. The EPA notes that a mitigation agreement must be reached between the entities proposing the plan, the residents, business owners, and municipalities that will be affected or involved. Given the multiple projects in the area and our current involvement with

stakeholders associated with the previous EJ mitigation plan, the EPA wishes to be involved in discussions regarding further avoidance, minimization and mitigation options.

Recommendation: The EPA recommends that the USACE continue follow-up on the mitigation plan and encourages the USACE to continue mitigation discussions between residents, business owners, municipalities and NGOs. The EPA requests that the USACE include the EPA in these follow-up discussions.

Other Community-Related Issues:

- Page 4-437, Table 4.16-2. The EPA is concerned regarding the lack of quantitative detail in the criteria. Terms like “slight” and “notable reduction” are not clear and need to be defined. Listed below are specific examples:
 - Under ‘Minor column’:
 - What is meant by “Slight reduction in economic activity”, “Slight changes in access”, “Slight changes in emergency response times”, “Slight impacts to neighborhoods”, “Temporary barriers to elderly”?
 - Under ‘Major column’:
 - What is meant by “Notable reduction in economic activity”, “Notable changes in access”, “Notable increase in emergency response”, “Lose of many homes”, “Long term and/or permanent barriers”?

Recommendation: The EPA recommends that the USACE quantify terms like “slight” and “notable reductions” in the FEIS to the extent practicable. The EPA also recommends that the USACE consider an intermediate criteria of “moderate” to express impacts that are not as severe as “major”.

- Page 4-420. The EPA is concerned that the USACE’s has not fully explained their determination of minor impacts to businesses. During the May 24 Public Hearing, there were concerns expressed by business owners that noise and increased traffic from the ICTF would negatively impact their business. The EPA generally concurs with these concerns and, even with the proposed mitigation, could still potentially impact these remaining businesses. These impacts have the potential to be more substantial than “minor”. The EPA is also concerned that the relocation of business will not be “minor” impacts and could potentially be “major”. As stated previously, this might be a good example of a “moderate” impact.

Recommendation: As discussed in previous comments, the EPA recommends that the USACE consider evaluating these impacts to businesses as “moderate” impacts and provide a rationale for this determination in the FEIS.

- Table 6-1, Page 6-5. In Table 6-1, the USACE states that Palmetto Railway will, “*Contribute to The City of North Charleston of \$8 million to mitigate impacts to the adjacent communities including loss of Sterret Hall.*” The EPA understands that the disposition of replacing Sterret Hall with a similar facility is still in question. If this is the case, the USACE should disclose this in the FEIS. Sterret Hall is a valuable resource for the local community and concerns regarding its replacement have been expressed by local citizens and community leaders.

Recommendation: For disclosure purposes, the EPA recommends that the USACE include the information on whether Sterret Hall will be replaced in the FEIS. The EPA also encourages the

USACE to continue to work with Palmetto Railways to ensure that Sterret Hall, if removed, will be adequately replaced and adjacent communities and local leaders have input into the process.

Cumulative Impacts

- **Figure 5.3-1:** The EPA believes that this is a good graphic for displaying projects. The EPA believes that the proposed ICTF project should be identified on the map to give stakeholders a location perspective of the project.

Recommendation: The EPA recommends that the USACE describe the purpose of this figure and display the proposed project on the map.

- **Page 5-16, 5.6.7 Air Quality.** The EPA believes that the USACE should include a conclusion as to the proposed project's potential cumulative impact on Air Quality. The EPA notes that the USACE in other sections (e.g., Wetlands, traffic, etc.) have summary paragraphs that estimate the proposed project's cumulative impacts.

Recommendation: The EPA recommends that the USACE include a summary paragraph in the FEIS that explains whether they believe that the proposed project will have a cumulative (adverse or beneficial) impact on air quality (similar to other media).