

## **Appendix E**

# **FRA Section 4(f) Determination Letter for the Navy Base Intermodal Container Transfer Facility at the Former Charleston Naval Complex in North Charleston, SC and Department of the Interior Response**



1200 New Jersey Ave, SE  
Washington, DC 20590

Ms. Michaela Noble  
Director  
Office of Environmental Policy and Compliance  
MIB, MS-2340  
US Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**Re: Section 4(f) Determination for the Navy Base Intermodal Container Transfer Facility at the Former Charleston Naval Complex in North Charleston, SC**

Dear Ms. Noble:

Enclosed for review by the Department of Interior (DOI) is an evaluation prepared in accordance with Section 4(f) of the Department of Transportation Act (Section 4(f)) by the Army Corps of Engineers (ACOE) and the Federal Railroad Administration (FRA) for the proposed construction of a new Intermodal Container Transfer Facility (ICTF) at the former Charleston Naval Complex in North Charleston, SC (Project). ACOE is the lead Federal agency for the preparation of an Environmental Impact Statement (EIS), and, in anticipation of funding for the Project potentially coming through FRA, FRA is a cooperating agency. In addition, FRA designated the ACOE as the lead Federal agency for compliance with Section 106 of the National Historic Preservation Act (Section 106). Palmetto Railways (Palmetto), which is a division of the South Carolina Department of Commerce, is the Project proponent and would be the rail operator for the Project. The Section 4(f) analysis is included as Section 4.18 in the enclosed Final EIS.

The Project consists of constructing and operating an ICTF on approximately 135 acres for the facility site, and undertaking off-site roadway and rail improvements for a total of 231.28 acres. The intermodal facility would include, but is not limited to, processing and classification railroad tracks, wide-span gantry cranes, container stacking areas, administrative buildings, and vehicle driving lanes. The off-site infrastructure improvements would include constructing: (1) a private drayage road and associated bridges approximately one mile long connecting the ICTF to the under construction Hugh K. Leatherman, Sr. Terminal; (2) rail improvements to the north and south of the ICTF resulting in 174,410 feet of new track; and (3) several roadway improvements and modifications, including the construction of a new overpass.

The Project site is on the Charleston Naval Complex (CNC) in North Charleston, South Carolina, on the former Clemson Site. It lies on the west bank of the Cooper River six miles north of the confluence with the Ashley River. It is centrally located between several terminals operated by the South Carolina Ports Authority, including the North Charleston Container Terminal, Veterans Terminal, the future Hugh K. Leatherman, Sr. Terminal, Union Pier Terminal, Columbus Street Terminal, and the Wando Welch Container Terminal. Intermodal containers that arrive at these marine terminals may be transported to the Navy Base ICTF or other destinations. The CNC is bounded by the Cooper River to the east, the neighborhoods of Chicora and Cherokee to the west, the Park Circle neighborhood to the north, and residential and industrial areas to the south.

There are two publicly-owned parks within the Project Study Area, although the Project will result in no impacts to those parks. There are no wildlife refuges within the Project Study Area. In support of the preparation of the EIS, ACOE surveyed the Project area for historic or cultural resources that would be protected under Section 106 and Section 4(f). ACOE determined, and the South Carolina State Historic Preservation Office (SHPO) concurred, that there are 11 historic properties with the Project's Area of Potential Effects (APE).

After consultation with the SHPO, ACOE and FRA determined, and SHPO concurred, that the Preferred Alternative for the Project – Alternative 1 – would result in an adverse effect on two historic resources. Specifically, Alternative 1 would have an adverse effect on the CNH historic district from demolition of contributing elements to the district, and on the USMC Barracks. In addition, the Project would result in uses under Section 4(f) of the Barracks and the CNH historic district. FRA has determined that there are no feasible and prudent alternatives to the Project's use of these resources, and that Alternative 1 would result in the least overall harm to the resources.

To facilitate compliance with Section 106, ACOE, Palmetto, FRA, the Advisory Council on Historic Preservation, the SHPO, and various consulting parties have signed a Memorandum of Agreement (MOA) for this Project to address the adverse effects to the CNH historic district and the USMC Barracks. The MOA describes agreed-upon measures that Palmetto will take to avoid, minimize, or mitigate the adverse effects. The signed MOA is enclosed with this letter. For more information on FRA's 4(f) determination and the process FRA used to reach that determination, please see the 4(f) Evaluation.

We would appreciate receiving an acknowledgement of DOI's review with any comments or suggestions within the next thirty days. To facilitate receipt of your response, please email a copy to [John.Winkle@DOT.Gov](mailto:John.Winkle@DOT.Gov) in advance of the original. Should you have any questions, please do not hesitate to contact Mr. John Winkle, Transportation Industry Analyst at (202) 493-6067.

We appreciate your assistance and cooperation.

Sincerely,

Michael Johnsen  
NEPA Team Lead,  
Environment and Systems Planning Division

Enclosures

Cc:

**Berzinis, Rebecca W**

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**From:** Winkle, John (FRA) <john.winkle@dot.gov>  
**Sent:** Monday, August 20, 2018 7:47 AM  
**To:** Boone, Shawn A CIV USARMY CESAC (US) (Shawn.A.Boone@usace.army.mil); Berzinis, Rebecca W  
**Cc:** Johnsen, Michael (FRA); Fitzgibbons, Kimberly D  
**Subject:** FW: Section 4(f) Determination for the Navy Base Intermodal Container Transfer Facility

Shawn/Rebecca –

See below for DOI's concurrence on the FRA's 4(f) determination for the ICTF.

Rebecca – please incorporate this into FRA's ROD.

Thanks,  
John

**From:** Carol Braegelmann [mailto:carol\_braegelmann@ios.doi.gov]  
**Sent:** Tuesday, August 07, 2018 3:18 PM  
**To:** Winkle, John (FRA) <john.winkle@dot.gov>  
**Subject:** Section 4(f) Determination for the Navy Base Intermodal Container Transfer Facility

Mr. Winkle,

The Department of the Interior coordinated with the National Park Service (NPS) and we do not object to the Section 4(f) approval for the proposed Navy Base Intermodal Container Transfer Facility at the former Charleston Naval Complex in North Charleston, SC. The NPS reviewed the recent Final EIS issued by the U.S. Army Corps of Engineers and appreciates the consultation on the Section 4(f) determination by the Federal Railroad Administration.

Regards,  
Carol Braegelmann

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*Carol Braegelmann*  
*Office of Environmental Policy and Compliance*  
*Department of the Interior*  
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