



C H A T H A M C O U N T Y - S A V A N N A H

METROPOLITAN PLANNING COMMISSION

Planning the Future - Respecting the Past

June 3, 2024

Via Electronic Mail

Karen.Stevens@stb.gov

Karen Jarrett
Chair

Travis H. Coles
Vice-Chair

Wayne Noha
Secretary

Laureen Boles
Treasurer

Traci Amick

Joseph B. Ervin

Jeff Notrica

Stephen Plunk

Coren Ross

Dwayne Stephens

Joseph T. Welch

Tom Woiwode

Michael Kaigler
Ex Officio
County Manager

Jay Melder
Ex Officio
City Manager

Melanie Wilson
Executive Director/CEO

Ms. Karen Stevens
Surface Transportation Board, OEA
Docket Nos. FD 36723 and FD 36723 (Sub-No. 1)
395 E Street, SW
Washington, DC 20423

RE: Docket No. FD 36723, Savannah Industrial Logistics, LLC – Construction Exemption & Docket No. FD 36723 (Sub-No. 1), Savannah Industrial Transportation LLC (SIT) – Lease and Operation Exemption – Line of Savannah Industrial Logistics, LLC in Effingham County, Ga.; Preliminary Environmental Consultation

Dear Ms. Stevens:

The Chatham County-Savannah Metropolitan Planning Commission (MPC) and Coastal Region Metropolitan Planning Organization (CORE MPO) are submitting comments regarding the safety and environmental impacts of the Savannah Industrial Logistics, LLC (SIL) rail line connection between Norfolk Southern Railway Company (NSR) and CSX Transportation, Inc. (CSXT). These comments rely on the CORE MPO Regional Freight Plan, completed in October 2023.

The MPC recommends the Surface Transportation Board consider the safety of at-grade crossings, impact on environmental justice populations, climate vulnerability, and emissions. Recommendations from the Regional Freight Plan relevant to the crossing are included.

At-Grade Crossings

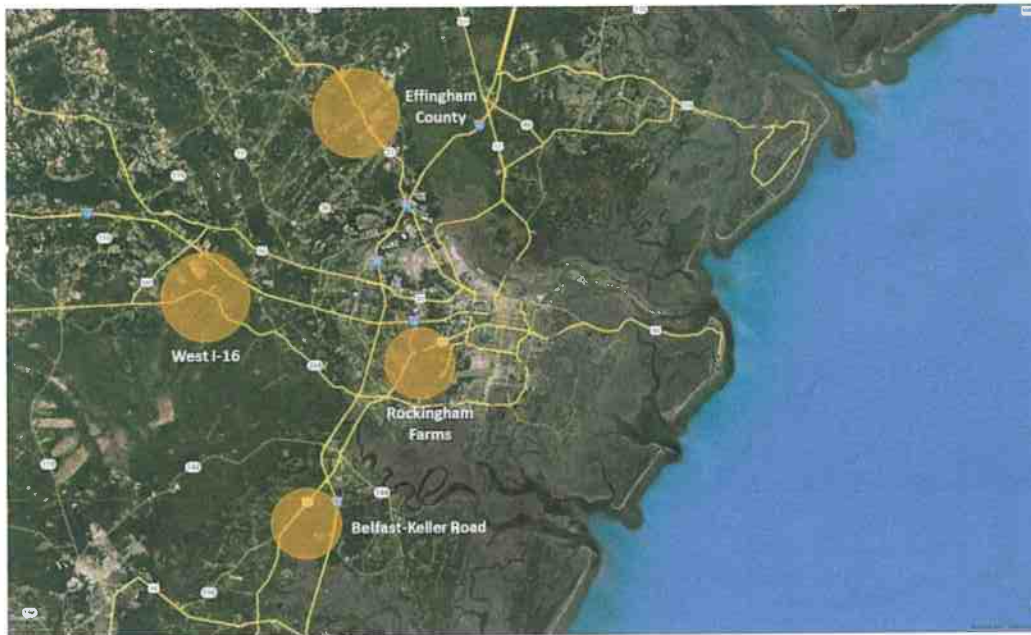
At-grade rail crossings are prevalent throughout the CORE MPO region and generally represent a physical constraint that contributes to freight and traffic bottlenecks. These crossings are points where the highway and rail systems interact and have the potential for conflict.

110 EAST STATE STREET, P.O. BOX 8246. SAVANNAH GEORGIA 31412 - 8246 PHONE 912-651-1440 FACSIMILE 912-335-5922

c:\users\everett\appdata\local\microsoft\windows\inetcache\content.outlook\82z4aoqa\2024-05-31-

savannahindustriallogistics_mpc.docx

FIGURE 2.6 EMERGING FREIGHT CLUSTERS



Source: Cambridge Systematics.

There are 192 at-grade crossings throughout the CORE MPO region. Nearly half of them are within a 5-mile radius of the Port of Savannah and impact key freight corridors such as SR 21, SR 25, SR 307, and Presidents Street. At-grade crossings and access management appear to be contributing factors to the region's congestion and travel time reliability challenges. Truck delays are largely concentrated on a handful of the region's major freight corridors. These include I-95, I-16, I-516, and SR 21.

Related to the region's congestion and reliability as well as infrastructure condition challenges, are challenges to network connectivity. Stakeholders for the CORE MPO Freight Plan Update identified two primary challenges that impact network connectivity in the region: (1) at-grade crossings and (2) lack of east-west roadway connectivity in certain areas. As the region has grown and new freight activity centers are emerging, formerly rural communities are now experiencing an influx of freight-oriented developments. While these developments are situated on or adjacent to major freight corridors, the existing freight network does not efficiently handle the origin-destination patterns generated by these developments.

Effingham County provides an example of this challenge, as it contains an emerging freight cluster along SR 21, where the SIL rail line acts as a connection within the Savannah Gateway Industrial Hub. Warehouses, distribution centers, and other freight-oriented land uses have been developed along or near freight corridors such as SR 21, McCall Road, and Old Augusta Road.

June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

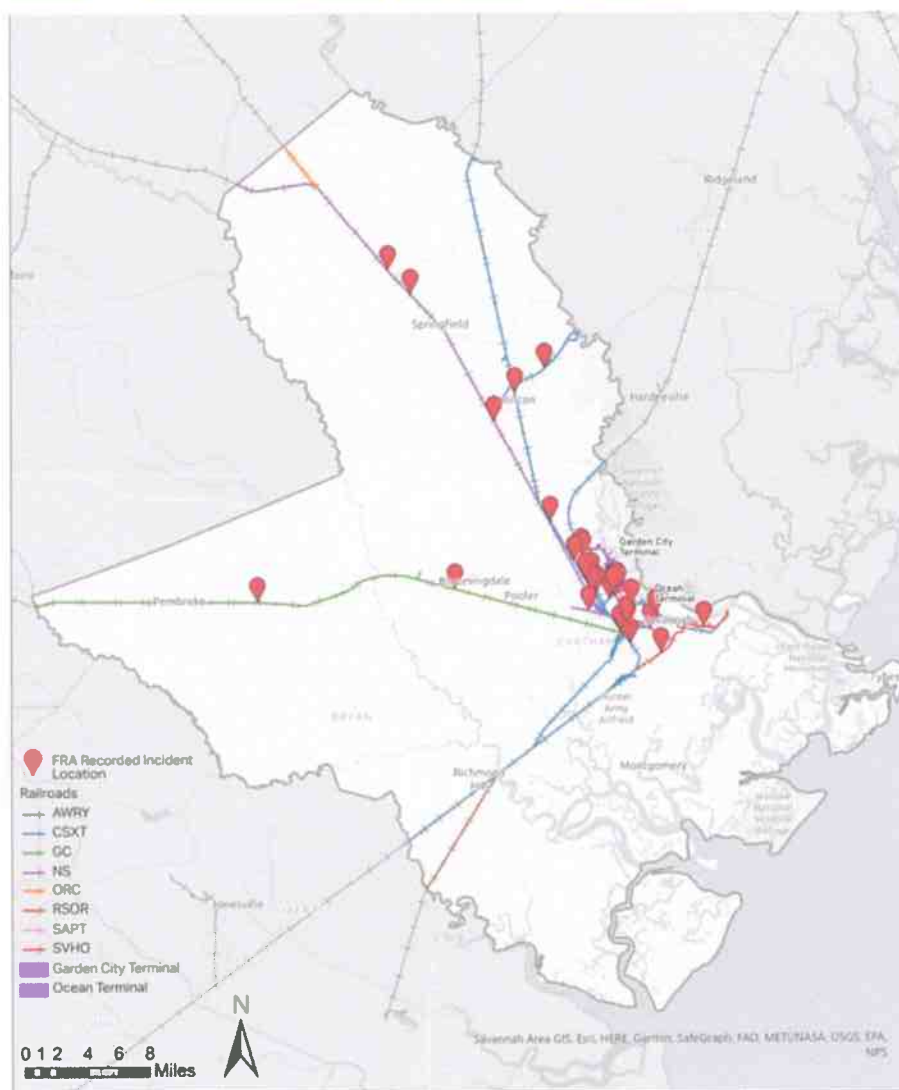
Chatham County-Savannah Metropolitan Planning Commission

Page 3

While the Savannah Gateway Industrial Hub is not fully built out yet, increased freight activity, by truck and rail, is expected to impact McCall Road.

The current roadway network provides good north-south connectivity to I-95 and the Port of Savannah, however, it does not provide good east-west connectivity to I-16. This contributes to congestion and reliability challenges on corridors such as SR 21 as they must facilitate east-west freight trips generated by these land uses due to a lack of connectivity. It appears the SIL rail line seeks to improve east-west connectivity yet did not consider the impacts on safety.

FIGURE 3.9 REGION-WIDE HIGHWAY-RAIL CROSSING INCIDENTS, 2012 - 2021



Source: Federal Railroad Administration, Highway-Rail Crossing Inventory; AECOM.

June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 4

Communities along corridors between freight gateways, auxiliary facilities, distribution centers, or manufacturers also face their own set of negative externalities produced by freight vehicle traffic. Communities along SR 21 have experienced growing truck traffic volume and congestion. For these types of impacts, roadway reconstruction projects can help alleviate these effects when these projects seek to accommodate freight vehicles while also enhancing safety and traffic flow for other users. For example, completion of the Jimmy Deloach extension as well as Effingham Parkway are expected to help alleviate overall congestion on SR 21.

While minor and (to a lesser extent) severe injury truck-involved crashes are broadly distributed across the region's highway network, fatal injury crashes appear to have primarily occurred on a few key freight routes. These include I-16, I-95, SR 21, SR 17/SR 30, and U.S. 17. Between 2012 and 2021, there were 62 highway-rail incidents involving freight railroads. Some crossings have had multiple incidents over this time frame. Of the region's 62 highway-rail incidents, 38 occurred at 11 crossings.

At-grade rail crossings represent points where the highway and rail systems interact and have the potential for conflict. Grade-level rail crossings can impose significant delays to trucks and other vehicles as they wait for trains to pass. In addition, trucks idling at crossings emit more pollutants especially as they must accelerate from a complete stop. Furthermore, at-grade crossings are a potential safety hazard as they present an opportunity for trains to collide with vehicles, pedestrians, or other roadway users. In total, there are 192 public at-grade rail crossings in the 3-county region of Bryan, Effingham, and Chatham County. Ninety percent of at-grade crossings are in environmental justice areas and historically disadvantaged communities. This means that initiatives to separate crossings, improve their safety, or reduce associated delays would benefit these communities.

Low-income areas are defined as Census tracts with a share of the population below poverty level larger than the regional share of 12.8 percent. In Effingham County, income-based environmental justice areas were identified around the cities of Rincon and Springfield. The SIL rail line is in an identified low-income area. The Blandford Elementary School is located just south of the SIL rail line at-grade crossing along McCall Road within the Savannah Industrial Gateway Hub. The at-grade crossing is within the school zone and could impact on school traffic and pose a risk to safety. There are currently no active safety measures at the crossing.

Active crossing treatments are those that give visual and audible advance notice of the approach of a train. These include flashing-light signals (both mast-mounted and cantilevered), bells, automatic gates, active advance warning devices, and highway traffic signals. Passive crossing treatments consist of regulatory signs, warning signs, guide signs, and pavement markings. These

June 3, 2024

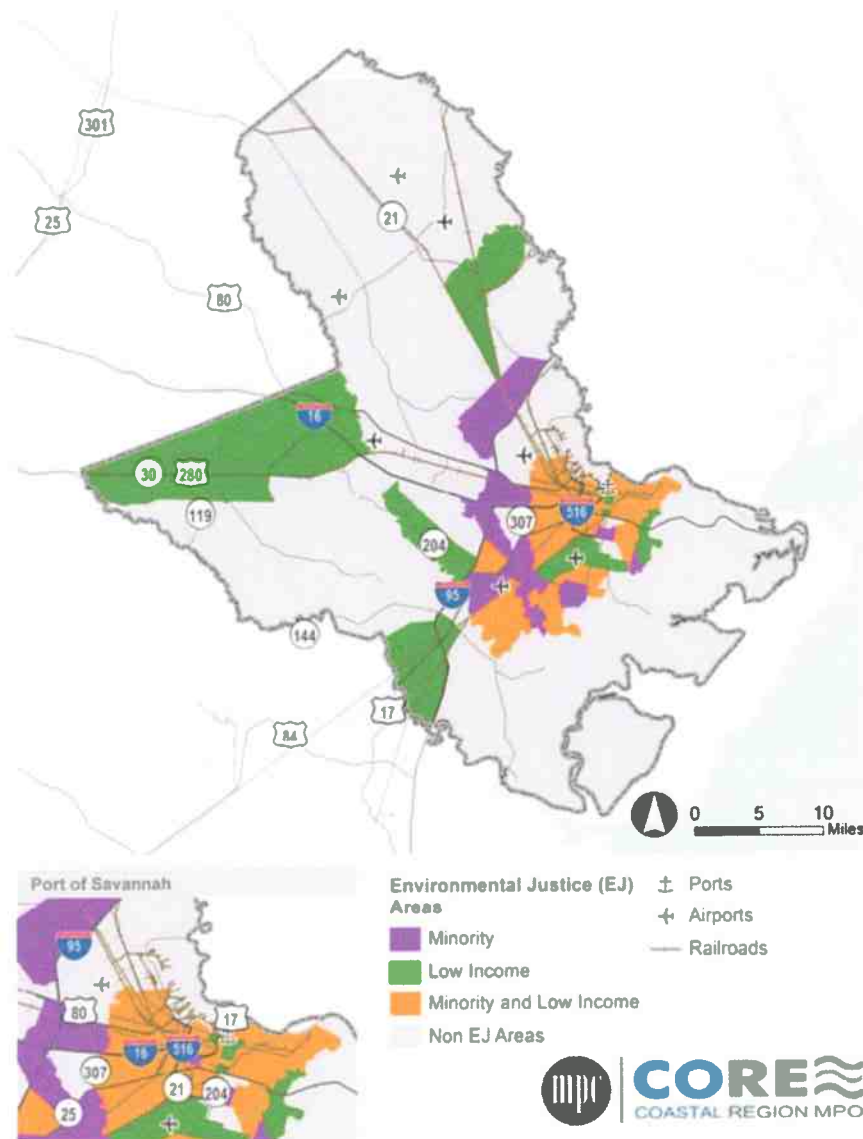
Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 5

devices provide static messages of warning, guidance, and in some instances, mandatory action for the driver. Generally, active crossing treatments provide greater safety to roadway users than passive or no treatments. We recommend active crossing treatments be implemented for the at-grade crossing along McCall Road.

FIGURE 2.1 ENVIRONMENTAL JUSTICE TARGET AREAS, 2020



Source: U.S. Census Bureau, 2020 Decennial Census and the 2016-2020 American Community Survey 5-Year Estimates; Cambridge Systematics, Inc. analysis.

June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 6



Source: Google Maps Street View

Noise and GHG Emissions

Increased noise and CO₂ emissions from the expected increase in freight activity are also potential concerns. Freight facilities and vehicles can generate significant noise, with loading and unloading equipment and 24-hour operations contributing to noise pollution in areas surrounding freight-intensive uses. Further, there are multiple regional trends indicating that truck CO₂ emissions will increase over the long term unless action is taken by regional leaders and their state and federal partners. The CORE MPO region is projected to experience substantial population growth over the next 20 years and will grow at a rate that exceeds statewide and national averages.

In addition, freight-related land use throughout the region is becoming more prevalent. The region's various economic development agencies are currently developing over 15,000 acres of land for heavy industrial and logistics uses. This is in addition to privately held properties being developed by the private sector for industrial uses. Underlying both the population growth and freight land use trends is the trend of accelerated growth at the Port of Savannah.

Vulnerable Railroad Assets

Figure 8.13 depicts the region's railroads and their composite risk vulnerability. The SIL rail line is in an area of low to moderate risk. As freight assets are put at risk, so too are the supply chains of which those assets are a part. If disrupted, freight movements are forced to find alternative and often unsuitable routes.

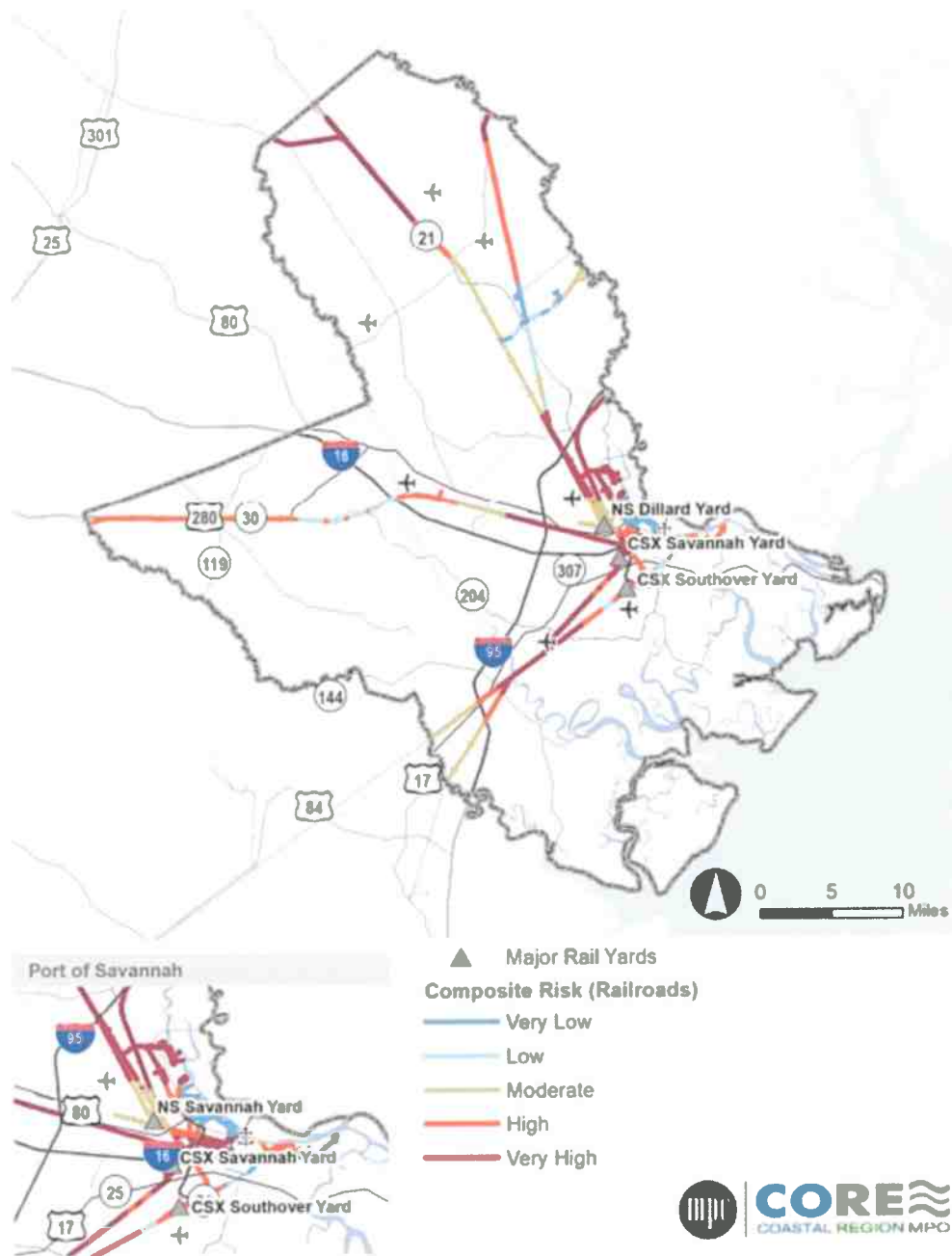
June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 7

FIGURE 8.13 VULNERABLE RAILROAD ASSETS



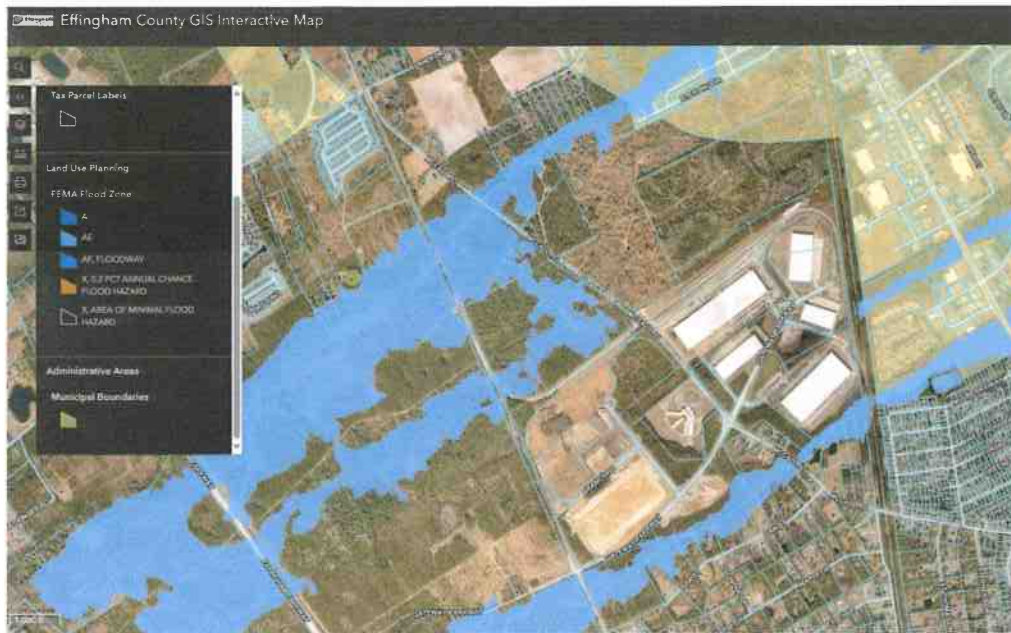
Wetlands are present west of McCall Road along the northern portion of the SIL rail line. The rail line does not appear to cross the wetlands except where it connects to the Norfolk Southern rail line.

June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 8



Source: Effingham County GIS

Freight Plan Recommendations:

The Regional Freight Plan offered recommendations at program and policy levels. There are several relevant to McCall Road, at-grade crossings, CO2 emissions, and green infrastructure. The Freight Plan anticipates McCall Road will need to be widened to accommodate for increased truck movement and will eventually need to be considered for the Effingham County Truck Ordinance.

Recommendations include:

- Traffic Signal at SR 21 and McCall Road (North): Signalize intersection, install northbound left turn lane, provide permissive-protected signal phase for westbound and northbound left turn movements, provide overlap phase for eastbound right turn movement.
- Lane Improvements at SR 21 and McCall Road (South): Install additional northbound left turn lane, install additional eastbound left turn lane, covert eastbound right turn lane to a channelized free-flowing movement.
- Blue Jay/McCall Road Freight Upgrades: Widen travel lanes and improve roadway structure to support truck movement. Upon completion, addition of these segments to the County truck ordinance as truck routes should be considered.
- McCall Road (South) Freight Improvements: Widen travel lanes and improve roadway structure to support truck movement. Upon completion, this roadway should be considered for the County truck ordinance.

June 3, 2024

Docket No. FD 36723 and FD 36723 (Sub-No. 1)

Chatham County-Savannah Metropolitan Planning Commission

Page 9

- Rail Crossing Safety Improvements: The region has nearly 200 at-grade rail crossings, but highway-rail incidents were concentrated at 34 crossings. The region should upgrade the safety equipment at these crossings.
- Install Green Infrastructure along Freight Routes and in Industrial Hubs: Incorporate green infrastructure such as bioswales, planter boxes, and street trees into the design of freight corridors.
- Estimate and Monitor Transportation Emissions to Support Mobility 2045 Environmental Goals: The CORE MPO may consider estimating and monitoring transportation emissions on a periodic basis. This would allow the CORE MPO to periodically assess and (as necessary) adjust its initiatives to reduce vehicle-miles traveled, thereby reducing transportation emissions. The Drawdown Georgia Project's Georgia GHG Emissions Tracker tool could serve as the basis for the CORE MPO to develop its own tool for monitoring transportation emissions in the region.

Thank you for the opportunity to comment on Docket No. FD 36723 and FD 36723 (Sub-No. 1). Please contact me with any questions.

Sincerely,



Melanie Wilson
Executive Director and CEO

MW:abm

cc: Wykoda Wang