

August 9, 2024

Danielle Gosselin
 Director
 Officer of Environmental Analysis
 Surface Transportation Board
 Washington, DC 20423
 By email at danielle.gosselin@stb.gov

RE: Docket No. FD 36723, Savannah Industrial Logistics, LLC (SIL) – 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.; Information Request No. 1

Dear Ms. Gosselin:

We are in receipt of your letter dated July 29, 2024, request further information regarding the above referenced matter. Below are our responses and we will forward all related documents, via a liquid file transfer, to Ms. Stevens. For ease of review we have repeated your questions/requests and then provided narrative in blue.

1. Rail Construction

A. Identify, describe, and map, including mileposts, the construction footprint of the previously constructed rail line including the length and endpoints of the track in Area 1, as well as the width of the disturbed area. Indicate the width of the right-of-way. Maps are preferred in GIS format, if available.

Please refer to the following plan sets:

- SGIH-NS Yard Track Plans-For Construction
- SGIH-CSX Lead Track Plans Sealed-1-24-20
- SGIH-A&R Track-Construction Set
- SGIH-Grading and Drainage Plans
- SIT-SIL Legal Description

The documents identify the location of the SIT tracks in Area 1 and 2 relative to the Norfolk Southern Railway Company (NSR) and CSX Transportation, Inc. (CSXT) rail lines and their respective milepost (MP). The point of switch for the turnout on NSR track is at NSR MP 16.59 and point of switch for the turnout on CSXT track is at CSXT MP 484.57.

The SIT has no mileposts. However, the documents referenced and table below identify each track and their respective location, beginning and ending points, and footage represented as stations (station on the drawing shown as STA with footage as 52+80.00 meaning 5,280.00').



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Track Name	STA Begin	STA End	Length	Description
Lead Track 1	102+53.80	142+17.29	3,963.49	Track beginning near CSXT. Continuing north along CSXT then curving west, tying into Lead Track 2.
Lead Track 2	202+25.30	278+04.57	7,579.27	Track beginning near NSR. Continuing northeast through McCall Road and the SIT yard to its end point.
Switcher Yard Track 2	20+00.00	46+58.27	2,658.27	Double ended track immediately south of Lead Track 1.
Switcher Yard Track 3	30+00.00	59+60.40	2,960.40	Double ended track immediately south of Switcher Yard Track 2.
Switcher Yard Track 4	40+00.00	67+07.58	2,707.58	Double ended track immediately north of Lead Track 1.

The documents also identify width, or limits, of disturbed areas/construction footprint.

When SIT/SIL acquired the line for the existing track it was done in conjunction with a larger real estate transaction so no ROW width truly exists. Document SIT/SIL Legal Description defines the boundaries of the rail corridor acquired, however, so you can see the varying widths throughout.

B. Identify, describe, and map, including mileposts, the construction footprint of any new project-related rail line construction in Areas 1 and 2 including the length and endpoints of any track as well as the width of the disturbed area. Indicate the width of any planned rights-of-way. Maps are preferred in GIS format, if available.

Please refer to the following documents:

- SIT Plan - prospective users
- SIT - Prospective Users detail
- Existing-Conceptual Plan - all areas
- Railworks list of equipment

While no project-rail related track is currently planned, the documents identify examples of potential ancillary track locations based on users that were previously interested in locating within Areas 1, 2 and 3. Track length, endpoints and width of disturbed area and rights-of-way would be specific to operations to support a future user.

- i. Provide an estimate of the duration of the construction period for any planned construction. Please also provide information on the number of cubic yards of soil that would be removed, the number of cubic yards of gravel that would be used, etc.

While no current construction is planned, duration and scope (soil, gravel, rail, etc.) are site and customer specific based on the operational needs required to provide rail service. Onsite construction activities for potential projects would be expected to be completed in less than one year of starting.

- ii. Provide a list of the anticipated construction equipment. Please include a description of the heavy equipment expected to be used and the anticipated amount.

While no current construction is planned, various trucks and equipment would be necessary to perform site, civil and track construction. Some examples of this equipment include- excavators, dozers, loaders, graders, scrapers, compaction equipment, dump trucks, tampers, regulators, backhoes, and speed swings. The "Railworks list of equipment" provides a listing of equipment which was used to complete the existing track work.

- iii. Describe how construction materials, including rail, ties, ballast, etc., would be delivered to the site (rail, truck, or a combination of both). Please include the anticipated amount and travel routes.

Construction materials are and have previously been delivered to the SIT by truck. Currently materials are delivered to the SIT yard office at 4575 McCall Road, Rincon, GA 31326. Based on the scope and location of future work it is possible that materials may come in differently, including via rail, with all being delivered to minimize disruption of surrounding areas.

C. Identify, describe, and map any plans to provide rail service to Areas 2, 3 and 4 of the Savannah Gateway Industrial Hub (SGIH). If there are any potential shippers, please provide the name and location of the potential shippers. Maps are preferred in GIS format, if available.

Please refer to the following documents:

SIT Plan - prospective users
SIT - Prospective Users detail
Existing-Conceptual Plan - all areas

While there are no current plans to expand rail service at this time, we have been approached by a number of potential shippers interested in locating at SGIH. Nothing at this time is anticipated in Area 4. Please refer to "Existing-Conceptual Plan all areas", "SIT Plan – prospective users" and SIT – Prospective Users detail" for possible track locations in Areas 2-3. Nothing at this time is anticipated in Area 4.

D. Describe and map by milepost the endpoints of the Norfolk Southern Railway Company (NSR) and CSX Transportation, Inc. (CSXT) mainlines. Maps are preferred in GIS format, if available.

Please refer to the following plan sets:

SGIH-NS Yard Track Plans-For Construction
SGIH-CSX Lead Track Plans Sealed-1-24-20

The point of switch for the turnout on NSR track is at NSR MP 16.59 and point of switch for the turnout on



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CSXT track is at CSXT MP 484.57.

E. Provide the typical cross section and the cross sections where cut and fill would be required.

Please refer to the following plan set:

SGIH-NS Yard Track Plans-For Construction

Typical cross sections are shown in the engineering design starting on sheet number 15. For new sites, cut and fill will be based on site specific conditions necessary for construction.

F. Provide information on the location and plans for any drainage culverts.

Please refer to the following plan sets:

SGIH-NS Yard Track Plans-For Construction

SGIH-CSX Lead Track Plans Sealed-1-24-20

SGIH-A&R Track-Construction Set

SGIH-Grading and Drainage Plans

Drainage culvert locations, diameter and type are identified for previously constructed track. Any future culvert locations and specifications will be designed based on requirements for the specific location.

G. Provide design plans for the at-grade rail crossing on McCall Road including any information on train warning systems at the crossing and any anticipated gates, flashers, cantilever flashing lights, or crossbucks.

Please refer to the following plan set:

SGIH-McCall Road Crossing 6-25-20

The McCall Road crossing is currently a passive at-grade rail crossing with MUTCD compliant signage. An active traffic control system will be installed should future conditions warrant it.

H. Provide any traffic studies performed for the at-grade railroad crossing on McCall Road including any grade crossing delay studies.

Please refer to the following documents:

Savannah Gateway TIS 8-30-19

DRAFT Savannah Gateway Industrial Hub TIS_191209

I. If a quiet zone was proposed for the at-grade crossing at McCall Road, describe any coordination with the communities that would have to apply to the Federal Railroad Administration (FRA) for the quiet zone, any coordination with agencies that have jurisdiction over the roadways (Georgia Department of Transportation, Effingham County), including any federal/state/local approvals obtained and physical improvements proposed.

No quiet zone has been proposed for the McCall Road at-grade crossing.



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J. Provide design plans for any proposed at-grade railroad crossings include any information on train warning systems at the crossings and any anticipated gates, flashers, cantilever flashing lights, or crossbucks.

There are currently no proposed at-grade crossings planned or required.

K. Provide any traffic studies performed for proposed at-grade railroad crossings including any grade crossing delay studies.

Please refer to the following documents:

Savannah Gateway TIS 8-30-19

DRAFT Savannah Gateway Industrial Hub TIS_191209

L. If a quiet zone was proposed for any proposed at-grade crossings describe any coordination with the communities that would have to apply to the Federal Railroad Administration (FRA) for the quiet zone, any coordination with agencies that have jurisdiction over the roadways (Georgia Department of Transportation, Effingham County), including any federal/state/local approvals obtained and physical improvements proposed.

No quiet zones have been proposed.

2. Rail Operations

A. Provide the number of trains per day (total, and in each direction) that currently use the previously constructed rail line.

Trains operate over the previously constructed track six (6) days a week. The number of trains per day and usage varies by segment of previously constructed rail line. CSXT and NSR deliver and pick up (Interchange) within the SIT rail yard by traversing the previously constructed track. Currently, interchange with CSXT occurs on Monday through Friday with 1 train in and 1 train out each day between CSXT track and the SIT yard. Interchange with NSR occurs on Tuesday through Saturday with 1 train in and 1 train out each day between NSR track and the SIT yard. SIT operates Monday through Friday switching railcars to the customer and building trains for outbound interchange.

Excluding the switching that occurs Monday through Friday by SIT trains per days is as follows:

2 trains per day one each direction on Monday and Saturday, and,

4 trains per day two in each direction Tuesday through Friday.

Railroad	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
CSXT		1 in, 1 out	1 in, 1 out	1 in, 1 out	1 in, 1 out	1 in, 1 out	
NSR			1 in, 1 out	1 in, 1 out	1 in, 1 out	1 in, 1 out	1 in, 1 out
SIT		Switching	Switching	Switching	Switching	Switching	

B. Provide the number of trains per day (total, and in each direction) that would use the previously constructed rail line based on projections up to and including the year 2029.



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As above, we have been approached by a number of potential shippers looking to locate at SGIH. While none of these potential shippers has committed, so as of now the operations described in the response to 2.A. would not change, any new users will certainly increase freight moved with how much being dependent on the individual user.

C. Indicate how many days per week trains would operate, and on which days, if known.

Six (6) days- Monday through Saturday.

D. Indicate the anticipated hours of train operations, specifying if trains would operate during AM/PM vehicular peak periods or overnight.

Train operations currently occur between 05:00 and 14:00. NSR interchange occurs before noon and CSXT occurs after noon. SIT switches customer rail cars and builds interchange beginning at approximately 05:30 until complete. During morning peak traffic, SIT does not block McCall Road. This schedule avoids vehicular peak periods.

E. Provide estimates of the average number of locomotives per train, the average number of railcars per train, and the average total length (in feet) of trains.

CSXT, NS and SIT each average one locomotive.

The average number of railcars is 10 per train per Class 1 interchange. Average train length 720 ft.

F. Provide the number of locomotives in each EPA emissions tier and associated total horsepower.

SIT has two (2) locomotives each are (EMD GP9) with 1,500 hp, Tier 0 Pre-Tier 0. Affiliates are currently evaluating the use of alternative fuel locomotives, including electric, and will do so at SIT if/when the technology proves to be efficient.

G. Provide average daily locomotive engine idling duration on site and engine horsepower during idling. Would locomotives be idling stationary within the SGIH? If so, where and for how long?

SIT has no locomotive idling. When the locomotives are not in use they are shut down.

H. Provide projected gross tonnage of an average consist (average daily or yearly). If the gross tonnage is expected to be consistently different by direction of travel (for example, unloaded consists traveling to the business park and loaded consists traveling from the business park) provide average loaded and unloaded consist gross tonnage.

An average inbound loaded train is approximately 10 railcars for a total of 1,430 gross tons.

An average outbound empty train is approximately 10 railcars for a total of 330 gross tons.

Loaded trains move from each Class 1 directionally towards the SIT yard. Empty trains are moved from the SIT yard to each Class 1.



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I. Provide an anticipated locomotive fuel efficiency factor in gross ton miles per gallon of fuel, if available.

Fuel savings through throttle modulation and only using one (1) locomotive unless tonnage requires the second locomotive. In 2023 SIT logged 950,229 gross ton miles on 3,941 gallons of fuel for a 241.11 GTM/gal.

J. Provide average train speed at the McCall Road crossing, and projected average train speed for any proposed at-grade crossings.

Average train speed is 10 mph or less. Going forward SIT will maintain a maximum speed of 10 mph.

K. Describe how the interchange of freight rail cars between SIT and CSXT and NSR occurs.

CSXT and NSR deliver and pick up (interchange) within the SIT rail yard.

L. Are switch locomotives used? If yes, provide the anticipated type of locomotive, EPA tier, activity information (hourly usage), and average fuel efficiency (gal/hour). Alternatively, if heavy equipment would be used to move railcars during operations (e.g., Trackmobile® or similar), provide emissions specifications.

Switch locomotives are currently used at the SIT. Both SIT switch locomotives are 4-axle EMD GP9's, Tier 0. Typically one (1) SIT locomotive is operated for 4 to 6 hours per day, five (5) days per week. Average fuel efficiency is 3 gallons/hour. SIT does not currently use other heavy equipment to move railcars.

M. Do rail cars contain hazardous materials? If so, indicate the type of materials.

No hazardous materials are currently shipped at the SIT.

N. Indicate where locomotives are fueled.

Please refer to the following plan set:

SGIH-NS Yard Track Plans-For Construction

Locomotives are fueled at the east end of the SIT railyard on Lead Track 2 between station 275+15.57 and station 277+85.57.

O. For any anticipated plans to serve new shippers, the same information requested in A-N above should be provided for the additional traffic, if available.

There are no reasonably anticipated plans to serve new shippers at this time.

3. Agency Coordination

A. Provide a summary of coordination with the City of Rincon, Effingham County, and other federal, state, or local agencies, indicating any approvals received to date, and the anticipated schedule for any remaining state and local permits and/or approvals that would be needed.



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Please refer to the following document:

15 Jul 20 NWP MFR
Clearing and Grading Permit SGIH NS ROW
Environmental ROE Rincon, GA Milepost SA 17
Clearing and Grading Permit SHIG CSX ROW
McCall Road At-Grade Crossing Plan Review Approval Letter
Savannah Gateway Industrial HUB Development Plan Review Approval Letter
Savannah Gateway Industrial Hub NS CSX ROW Approval Letter
Savannah Gateway Industrial Hub

SIT and its consultants worked with the various governing agencies to obtain all required permits and approvals. There are no remaining permits or approvals pending or needed at this time.

B. Provide any coordination with school district and/or local agencies regarding the at-grade crossing on McCall Road.

Please refer to the following document:

McCall Road At-Grade Crossing Plan Review Approval Letter

The McCall Road crossing construction plans were reviewed and approved by a 3rd party engineering firm on behalf of Effingham County and the City of Rincon.

C. Provide any outreach or public involvement activities that occurred for the previously constructed rail line.

The Effingham County Development Authority, in conjunction with SIL/SIT, pursued the Research Forest land development and SIT rail line construction, starting in the mid-2000's. The actions and intentions of the Effingham County Development Authority are documented in the public record.

D. Provide any environmental commitments made to other federal, state, or local government entities as part of their review and approval processes including, but not limited to, traffic, air quality, noise, hazardous materials, natural resources, cultural resources, and public/agency/tribal involvement/outreach.

Please refer to the following document:

Army Corp Memorandum of Record. 15 Jul 20 NWP MFR

Also refer to the supporting studies and reports that were commissioned by the Effingham County Development Authority and previously provided to the STB Office of Environmental Analysis on August 23, 2023 – a list of which is attached hereto as Appendix 1.

4. Wetlands

A. Provide any wetlands survey, delineation, and/or investigation findings previously conducted within the SGIH in GIS format, if available.

Please refer to the following documents:



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USACE Expanded JD 2015
SGIH RR PCN14 CSX Package 02-17-2020
Research Forest Wetland Survey
Research Forest Wetland Masterplan 2012
Jurisdictional Wetlands_20160509104439

There are several surveys and reports that document the wetland surveys, delineations, and investigation findings. Refer to Wetland Exhibit figures and survey data in the document titled "Research Forest Wetland Survey". Also refer to other wetland documents commissioned by Effingham County, including "Research Forest Wetland Masterplan 2012" and "Jurisdictional Wetlands_20160509104051". USACE issued wetlands jurisdictional determinations in the documents titled "USACE Expanded JD 2015" and "Jurisdictional Wetlands_20160509104439". Also reference the February 17, 2020, Application for Section 404 Nationwide Permit #14 submitted to USACE by the OmniTRAX engineering contractor document titled "SGIH RR PCN14 CSX Package 02-17-2929".

5. Hazardous Materials

A. Provide any American Society for Testing and Materials (ASTM) Phase I or Phase II Environmental Site Assessments (ESAs) completed for properties within or along the previously constructed rail line, or the SGIH.

Please refer to the following document:

ES11026.01 Effingham-Research Forest Tract - 1.12.2012

This is the Phase 1 ESA report. There are no ESA reports commissioned after the SIT rail line was constructed in 2020.

B. Provide any records of spills or documented releases along the previously constructed rail line.

There are no records of spills or documented releases along the previously constructed rail line.

C. Provide any applicable Spill Prevention and Control Countermeasure (SPCC) Plans, vegetation management plans, or pesticide application plans.

SIT does not have oil or fuel tanks greater than 1,320 gallons. Therefore, SIT is not governed under the SPCC regulations (40 CFR 112) and does not have a SPCC plan. Vegetation is managed in compliance with Federal Railroad Administration regulations 49 CFR 213). Pesticide applications are performed at the SIT on an as-needed basis by a licensed 3rd party vegetation control contractor.



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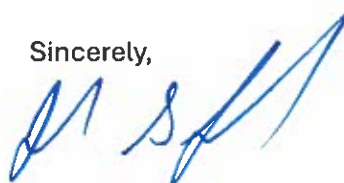
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As above, we will forward all referenced documents to Ms. Stevens. Please do not hesitate to reach out to us if you need further information or have any other questions.

Sincerely,



John G. Spiegleman
Chief Legal Officer

Cc Karen Stevens - with attachment via liquid files (karen.stevens@stb.gov)
Robert Wimbush (rwimbush@fletcher-sippel.com)
Bob Rentz (rentz@omnitrax.com)
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Appendix 1

02-SGIH-Drainage-Report_w_App-NS-CSX-Yard_1st_Sub_2020-03-19.pdf
Development-Plan-Review-Application-PDF.pdf
SGIH-Hydrology Report-1st-NS-CSX ROW ESCP_w_App_2020-01-17.pdf
SGIH-Phase2_NS-Hydraulics_TM_Final.1.24.2020.pdf
SGIH-Phase1_CSX-Hydraulics_TM_DraftFinal.pdf
SGIH-1st-CD-Sub-Response to Comments_2020-05-26.pdf
Effingham Co Rincon Cultural Survey.6.4.2004.pdf
Wetland Survey_2012.pdf
Protected Species Report IDA RF final .pdf
Coastal Regional Commiss_.6.1.2012.pdf
USACE Jurisdictional Wetlands_.5.19.2005.pdf
Sewer and Reuse Water Ma_.10.2006.pdf
ES1 Effingham-Research Forest Tract - REVISED.1.12.2012.pdf
Research FEMA Zone.pdf
Sewer and Re-Use Masterplan.pdf
Phase 1 Traffic Impact S_.10.2010.pdf
GDOT permit summary Effingham Parkway.6.26.2014.pdf
ES115071 Project Delta Geotech.6.20.2011.pdf
Clearing and Grading Permit Research Forest Tract, ph II west side.pdf
Clearing and Grading Permit Research Forest Tract, ph III.PDF
Clearing and Grading Permit SGIH CSX ROW5.6.2020.pdf
Clearing and Grading Permit SGIH NS ROW.6.2.2020.pdf
EOM McCall Road At-Grade Crossing Plan Review Approval Letter6.29.2020.pdf
EOM review of site clearing and grading plans.4.16.2020.pdf
EOM SW and site plan review approval letter6.24.2020.pdf
GSWCC erosion and pollution control plan review3.27.2020.pdf
SGIH RR PCN14 CSX Package 02-06-2020 (004).pdf
USACE Expanded JD 2015.pdf
Army Corp Memorandum of Record.15 Jul 20 NWP MFR.pdf



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