

ENTERED
Office of Chief Counsel
September 16, 2025
Part of
Public Record

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September 16, 2025

Cynthia T. Brown
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street S.W.
Washington, DC 20423-0001

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, GA
Surface Transportation Board Docket No. AB 312 (Sub-No. 6X)

Dear Ms. Brown:

The South Carolina Central Railroad Company, LLC ("SCRF") is submitting the enclosed Environmental and Historical Report in anticipation of SCRF's filing of a notice of exemption to abandon a freight rail easement in the City of Columbus, Muscogee County, GA. On September 15, 2025, SCRF filed the enclosed report with the consulted agencies named on the service list.

If you have any questions related to this filing, please let me know.

Sincerely,



Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure

Before the
SURFACE TRANSPORTATION BOARD

STB Docket No. AB 312 (Sub-No. 6X)

SOUTH CAROLINA CENTRAL RAILROAD COMPANY, LLC
- ABANDONMENT EXEMPTION –
IN MUSCOGEE COUNTY, GA

ENVIRONMENTAL/HISTORIC REPORT

(color copies included)

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*Counsel for South Carolina Central
Railroad Company, LLC*

Dated: September 15, 2025

Before the
SURFACE TRANSPORTATION BOARD

STB Docket No. AB 312 (Sub-No. 6X)

SOUTH CAROLINA CENTRAL RAILROAD COMPANY, LLC
- ABANDONMENT EXEMPTION –
IN MUSCOGEE COUNTY, GA

ENVIRONMENTAL/HISTORIC REPORT

South Carolina Central Railroad Company, LLC (“SCRF” or “Applicant”) will be seeking exemption authority for Applicant to abandon a permanent freight easement of approximately 2.17-miles of rail line in Columbus, Muscogee County, GA (the “Subject Line”). The “Subject Line” includes, the “Dummy Line” extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. The Georgia Department of Transportation (“GDOT”) owns the physical assets of the Subject Line and SCRF will salvage it on behalf of the agency. It is SCRF’s understanding that the City of Columbus is conducting a repaving project on the portions of the Subject Line that fall within 6th Street. Following consummation of the abandonment, SCRF will release its permanent freight easement to GDOT.

The Subject Line traverses through United States Postal Service ZIP Code 31901. A map of the Subject Line is attached as Exhibit A.

Applicant intends to seek Surface Transportation Board (“STB” or the “Board”) authorization for the abandonment through a class exemption pursuant to the provisions of 49 CFR §1152.50 to enable SCRF to abandon its permanent freight easement of the Subject Line, on or after October 3, 2025. This Report is being filed in connection therewith, and in accordance with

the requirements of 49 CFR §§1105.7 and 1105.8. To prepare this Report, Applicant consulted with various state and federal agencies as required by the Board's regulations. See the letters attached as Exhibit B dated June 25 and August 11, 2025. Based on the written responses received by Applicant to-date attached as Exhibit C, Applicant states as follows:

ENVIRONMENTAL REPORT

(49 CFR 1105.7)

1. PROPOSED ACTION AND ALTERNATIVES

SCRF is a Class III railroad. The Subject Line is located in Columbus, Muscogee County, Georgia and is owned by the State of Georgia, Department of Transportation.¹ SCRF acquired the Subject Line in 2002, but it is operated by the Georgia Southwestern Railroad, Inc. ("GSRW").² Genesee & Wyoming Inc. gained control of SCRF and GSRW in 2012.³ GSRW will file a discontinuance exemption jointly with the SCRF abandonment exemption. However, the GSRW is not required to file an environmental and historical report. No local service has been provided on the line since 2016, there is no overhead traffic, and the line is stub ended. Following the abandonment, SCRF plans to release its freight easement to GDOT. SCRF will salvage the Subject Line on behalf of GDOT to facilitate a City of Columbus repaving project.

2. EFFECTS ON THE TRANSPORTATION SYSTEM

The abandonment will have no effect on the transportation system because there is no overhead traffic over the Subject Line and the last date of local service to or from the Subject Line

¹ *State of Georgia, Department of Transportation – Acquisition Exemption – South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34057 (served Jan. 18, 2002).

² *Georgia Southwestern Railroad, Inc. – Sale and Lease Exemption within a Corporate Family Transaction - South Carolina Central Railroad Company, Inc.*, STB Finance Docket No. 34144 (served Jan. 18, 2002).

³ *Genesee & Wyoming Inc. – Control Exemption – RailAmerica, Inc. et al.* STB Finance Docket 35654 (served Dec. 20, 2012).

was June 30, 2016. As such, no traffic will be diverted. Although, GDOT, as the owner of the underlying assets of the Subject Line is aware of SCRF's planned abandonment of its freight easement, SCRF sent consultation letters regarding the proposed abandonment to the agency. See the letter attached as part of Exhibit B. To date SCRF has not received a response.

3. **LAND USE**

(i) Applicant is unaware of any regional or local land use patterns with which the proposed abandonment would be inconsistent. Applicant consulted with the following agencies regarding the proposed abandonment that may be concerned with land use issues: US Department of Agriculture Natural Resources Conservation Service – Local ("NRCS Local"), US Department of Agriculture Natural Resources Conservation Service – National ("NRCS National"), Environmental Protection Agency Region 4 ("EPA Region 4"), U.S. Army Corps of Engineers South Atlantic Division, Savannah District ("ACE"), National Park Service ("NPS"), , U.S. Fish & Wildlife Service – Southeast Region 4 ("FWS"), National Geodetic Survey, National Oceanic and Atmospheric Administration ("NGS"), Georgia Department of Natural Resources ("DNR"), Georgia Environmental Protection Division ("GA EPD"), Mayor Skip Henderson and the Columbus City Manager's Office.

Copies of these letters are attached as part of Exhibit B. To date, Applicant has received written responses from the following consulted agencies, copies of which are included as part of Exhibit C:

- GA EPD responded "[i]f this project disturbs one acre or more, it will require coverage under the General NPDES Permit for Storm Water Discharges Associated with Construction Activity. Part IV of the Permit requires the submittal of the Erosion, Sedimentation and Pollution Control Plan to EPD's Watershed Protection Branch. If state waters buffers are planned to be impacted and the activity is not an exempted buffer encroachment, a buffer variance may be necessary." Further, GA EPD responded, "[s]hould the United States Army Corps of Engineers determine that an individual permit under Section 404 of the Clean Water Act is required for the project;

a Section 401 Water Quality Certification should concurrently be sought from the Georgia Environmental Protection Division.

- DNR responded that “it does not perceive that the abandonment will have a significant effect upon the environment.” DNR also notes that a parcel outside of the Subject Line, but nearby the Subject Line “(Former E. Cohn Voluntary Remediation Program (VRP) site) located just east of milepost [0.60] and north of 6th Street has documented environmental impacts to soil and groundwater by select inorganic and organic constituents of concern (COCs). Therefore, should rail line abandonment extend beyond milepost [0.60] to the east and onto the referenced parcel north of 6th Street, appropriate caution should be taken with respect to disturbance of soil and the selection of proper personal protective equipment (PPE) to ensure that exposure to COCs does not occur to personnel conducting the abandonment activities.”
- NRCS Local responded that proposed abandonment: 1) is exempt from the Farmland Protection Policy Act because it is completely contained within a U.S. Census Bureau designated urban area; 2) will not impact any National Resource Conservation Service Watershed Dams; and 3) will not impact any National Resource Conservation Service Easements.
- In response to our consultation letter to the Columbus City Manager’s office, the Director of Engineering for the Columbus Consolidated Government responded that it “has no environmental concerns” with the abandonment.

(ii) Applicant does not believe that the proposed abandonment will have any adverse effect on any prime agricultural land. Consultation notices were sent to the potentially concerned agencies listed in paragraph 3(i) above, and as indicated, NRCS Local has indicated that the abandonment will not impact any environmental resources within its jurisdiction.

(iii) Muscogee County does not fall within the Georgia coastal zone. The Georgia Coastal Resources Division responded to Applicant’s consultation letter confirming SCRF’s statement of this fact. *See Exhibit C.*

(iv) Applicant believes that the right of way may be suitable for public purposes. Following the abandonment, Applicant intends to release its freight easement for the benefit of GDOT and the City of Columbus.

4. **ENERGY**

The Subject Line has no local customers and has no overhead service. As such,

(i) the proposed abandonment will have no effect on the transportation of energy sources;

(ii) the proposed abandonment will have no effect on recyclable commodities;

(iii) the proposed abandonment will be no effect on overall energy efficiency;

and

(iv) the proposed abandonment will not divert any traffic from rail to motor carriage.

The effects of the proposed abandonment will not exceed the thresholds set forth in 49 CFR 1105.7(e)(4)(iv).

5. **AIR**

The proposed abandonment will not result in any increases in rail or truck traffic or rail yard activity. The effects of the proposed abandonment will not exceed the thresholds set forth in 49 CFR 1105.7(e)(5).

6. **NOISE**

Applicant does not believe that the proposed abandonment will result in any increase in noise levels.

7. **SAFETY**

Applicant does not believe that the proposed abandonment will have any adverse effect on public health or safety.

8. BIOLOGICAL RESOURCES

(i) Applicant has consulted with the FWS, as well as to the following agencies that are potentially concerned with biological resources: DNR, GA EPD, NPS, ACE, NRCS National, and NRCS Local. Copies of these consultation letters are attached as part of Exhibit B. As stated above in section 3(i), Applicant received responses from GA EPD, DNR, and NRCS Local. None suggest any adverse effects on biological resources, except GA EPD explained its regulatory process if any impact may occur.

(ii) Applicant does not believe that there are any wildlife sanctuaries or refuges, National or State parks or forests in the vicinity of the proposed abandonment. Consultation letters were sent to the agencies identified in the paragraph 8(i) and Applicant has not received any responses.

9. WATER

(i) The proposed abandonment and any salvage will be handled in a manner that is consistent with the applicable local, State and Federal water quality standards. Applicant consulted with the agencies identified in paragraph 8(i) and only GA EPD had any substantive comment which is summarized under section 3(i).

(ii) Applicant sent a consultation letter regarding the proposed abandonment to the U.S. Army Corps of Engineers. A copy of this letter is attached as part of Exhibit B. As stated above in section 3(i), ACE emailed that Applicant's consultation request had been received and forwarded to a Team Lead, but Applicant has not received any further comment.

(iii) Applicant does not believe that any Clean Water Act permits will be required. Consultation letters were sent to DNR, GA EPD, and EPA. Copies of these letters are

attached as part of Exhibit B. As stated above in section 3(i), Applicant received a response from GA EPD.

10. PROPOSED MITIGATION

Since no adverse environmental impacts are expected, no mitigation is proposed.

11. ADDITIONAL INFORMATION FOR RAIL CONSTRUCTION

Not applicable.

12. CONSULTATION

As shown by the copies of letters attached as Exhibit B, Applicant has consulted with the following agencies: NRCS Local, NRCS National, EPA Region 4, ACE, NPS, FWS, NGS, SDOT, GA EPD, DNR, Georgia Coastal Resources Division, GDOT, Mayor Skip Henderson, and the City Manager's Office.

13. CERTIFICATIONS

Applicant certifies that:

- (a) It consulted with the agencies listed in 49 CFR 1105.7, as described in paragraph 12 above.
- (b) On this date, it sent copies of this report to each of the agencies consulted as shown on the attached certificate of service.
- (c) Notice of the proposed abandonment was published in the *Columbus Ledger-Enquirer* on August 15, 2025. A copy of the form of notice and the proof of publication are attached as Exhibit D.
- (d) Applicant will not file its notice of exemption for the abandonment until twenty (20) days after the consulted agencies have been served with a copy of this report.

HISTORIC REPORT (49 CFR 1105.8)

1. U.S.G.S TOPOGRAPHIC MAP

U.S.G.S. topographic maps showing the location of the proposed abandonment are attached as Exhibit E.

2. DESCRIPTION OF RIGHT OF WAY

Applicant intends to seek STB authorization to abandon 2.17 miles of a permanent freight easement on a rail line that includes, the “Dummy Line” extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61 through a class exemption pursuant to the provisions of 49 CFR §1152.50 to enable SCRF to abandon its permanent freight easement of the Subject Line, on or after October 3, 2025. The Georgia Department of Transportation (“GDOT”) owns the physical assets of the Subject Line and SCRF will salvage it on behalf of the agency and in furtherance of a City of Columbus repaving project. Following consummation of the abandonment, SCRF will release its permanent freight easement to GDOT.

The Subject Line is located in an urban area. The right of way is generally 20 feet wide. The right of way is crossed by nine public roadways.

3. PHOTOGRAPHS OF HISTORIC STRUCTURE(S)

No structures 50 years old or older (historic) exist on the Subject Line.

4. DATES OF CONSTRUCTION OF HISTORIC STRUCTURE(S)

SCRF has no documents that pertain to any structures on the Subject Line which are over 50 years old.

5. HISTORY OF CARRIER OPERATIONS IN THE AREA

The Subject Line is located in Columbus, Muscogee County, Georgia. SCRF acquired the freight operating easement on the Subject Line in 2002 from Georgia Southwestern Railroad, Inc. (“GSWR”), but in that transaction, GSWR acquired the right to operate the Subject Line by lease.⁴ At the same time, the State of Georgia, Department of Transportation acquired the underlying assets of the Subject Line, but not the common carrier obligation.⁵ Genesee & Wyoming Inc. gained control of SCRF and GSWR in 2012.⁶

6. SUMMARY OF STRUCTURE DOCUMENTATION

SCRF has no documentation pertaining to any structures over 50 years old.

7. OPINION REGARDING CRITERIA FOR LISTING

Applicant provided notice of the proposed abandonment to the Georgia Department of Community Affairs, State Historic Preservation Office (“SHPO”) via letters dated June 25, 2025, and August 11, 2025. The SHPO responded that SCRF’s intention to abandon its freight operating easement and remove/salvage the rail line within the roadway and repaving the road would be an “adverse effect on the National Register of Historic Places (“NRHP”) – eligible GAAL Railroad and the NRHP-listed Columbus Historic District.” The SHPO further outlined steps that it recommends be completed in consultation with the Surface Transportation Board to “resolve the adverse effect, complete the consultation process, and continue with the project.” Correspondence with the SHPO is included as part of Exhibit F.

⁴ *Georgia Southwestern Railroad, Inc. – Sale and Lease Exemption within a Corporate Family Transaction - South Carolina Central Railroad Company, Inc.*, STB Finance Docket No. 34144 (served Jan. 18, 2002).

⁵ *State of Georgia, Department of Transportation – Acquisition Exemption – South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34057 (served Jan. 18, 2002).

⁶ *Genesee & Wyoming Inc. – Control Exemption – RailAmerica, Inc. et al.* STB Finance Docket 35654 (served Dec. 20, 2012).

8. **ENVIRONMENTAL CONDITIONS**

In consideration of the SHPO's "adverse effect" determination, Applicant will consult with the appropriate Board staff to comply with the conditions suggested by the SHPO letter.

Respectfully submitted,



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*Counsel for South Carolina Central
Railroad Company, LLC.*

Dated: September 15, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September, I served a copy of the foregoing Environmental and Historic Report on the persons listed below by email or first class mail, postage prepaid:

Nelson Velazquez Gotay, Soil Scientist U.S. Department of Agriculture Natural Resources Conservation Service Georgia State Office 355 E. Hancock Ave Athens, GA 30601-2775 Nelson.velazquezgotay@usda.gov	Kevin J. McOmber, PE, Regional Administrator Office of the Regional Administrator US EPA Region 4 Atlanta Federal Center 61 Forsyth Street SW Atlanta, GA 30303-8960 McOmber.kevin@epa.gov
United States Department of Agriculture Natural Resources Conservation Service Office of the Chief 1400 Independence Ave., SW Room 5105-A Washington, DC 20250	U.S. Army Corp of Engineers South Atlantic Division, Savannah District 100 W Oglethorpe Ave Savannah, GA 31401-3604 cesas-cco@usace.army.mil
National Park Service 1849 C Street, NW Washington, DC 20240	Darrell Echols, Acting Regional Director Region 2 South Atlantic-Gulf National Park Service 100 Alabama Street, SW 1924 Building Atlanta, GA 30303
United States Fish & Wildlife Service Southeast Region 4 1875 Century Boulevard Suite 400 Atlanta, GA 30345	National Geodetic Survey rrae@noaa.gov
Georgia Department of Natural Resources Coastal Resources Division One Conservation Way Suite 300 Brunswick, GA 31520-8687 kelie.moore@dnr.ga.gov	J. Tilden Bembry Georgia Environmental Protection Division Water Protection Branch 2 Martin Luther King Jr. Drive SE Suite 1456, East Tower Atlanta, GA 30334 askepd@gaepd.org Tilden.bembry@dnr.ga.gov
Georgia Department of Natural Resources	Georgia Department of Transportation

Environmental Protection Division 2 Martin Luther King J. Dr. Suite 1252 Atlanta, VA 30334 william.lucas@dnr.ga.gov	Intermodal Division Clement Solomon, Director One Georgia Center 600 West Peachtree St NW, 6th Floor Atlanta, GA 30308
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ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT A

MAP



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June 25, 2025

Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Suite 300
Brunswick, GA 31520-8687
kelie.moore@dnr.ga.gov

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, Georgia
Surface Transportation Board Docket No. AB 312 (Sub. No. 6)

Dear Ms. Moore:

This letter is to advise you that South Carolina Central Railroad Company, LLC ("SCRF") intends to file a notice of exemption for SCRF to abandon a permanent freight easement of approximately 0.58 miles of rail line (the "Subject Line") from approximately milepost 0.38 to the switch at approximately milepost 0.97 in Columbus, Muscogee County, Georgia.

The majority of the Subject Line is situated on 6th Street in Columbus, GA and the Georgia Department of Transportation ("GDOT") owns the physical assets of the Subject Line. SCRF will salvage the Subject Line on behalf of GDOT and following the abandonment of the Subject Line, SCRF will release its permanent freight easement.

The Subject Line traverses through United State Postal Zip Code 31901. A map of the Subject Line is enclosed hereto.

SCRF intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable SCRF to abandon the Subject Line, on or after August 25, 2025, in STB Docket No. AB 312 (Sub. No. 6).¹

Based upon information in SCRF's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental and historical report as required by applicable STB regulations, we are consulting with the Coastal Resources Division as to any concerns which you may have as to the environmental effects of the proposed abandonment.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

June 25, 2025
Page 2

Considering that the proposed abandonment is located in a county not designated as part of Georgia's coastal zone, it is SCRF's assumption that no impact exists. However, please confirm that our assumption is correct.

We would appreciate an expression from you by August 1, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon the environment (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

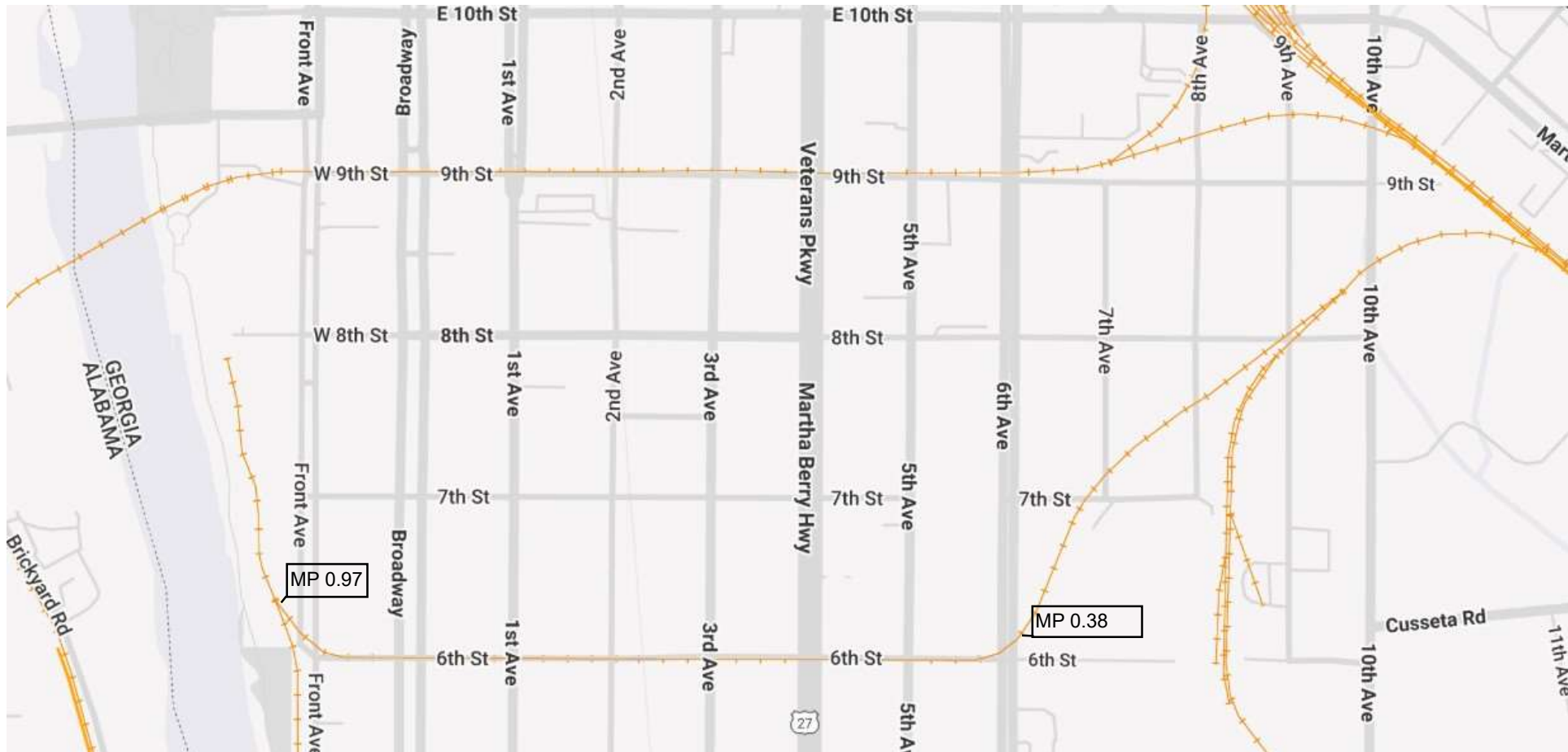
Thank you for your cooperation.

Sincerely,



Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure





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August 11, 2025

Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Suite 300
Brunswick, GA 31520-8687
kelie.moore@dnr.ga.gov

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, Georgia
Surface Transportation Board Docket No. AB 312 (Sub. No. 6)
Re-Notice of Intent to Abandon

Dear Ms. Moore:

On June 25, 2025, South Carolina Central Railroad Company, LLC ("SCRF") submitted a letter to you notifying you of its intent to abandon a permanent freight easement on a line of railroad in Columbus, Muscogee County, Georgia. SCRF is sending this letter to renotify you of its intent to abandon to allow SCRF to correct an error in the description of the line and to expand the scope of its abandonment.

The "Subject Line" includes, the "Dummy Line" extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. The Subject Line traverses through United State Postal Zip Code 31901. A map of the Subject Line is enclosed hereto.

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In advance of preparing an environmental and historical report as required by applicable STB regulations, we are consulting with the Coastal Resources Division as to any concerns which you may have as to the environmental effects of the proposed abandonment.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

August 11, 2025
Page 2

Considering that the proposed abandonment is located in a county not designated as part of Georgia's coastal zone, it is SCRF's assumption that no impact exists. However, please confirm that our assumption is correct.

We would appreciate an expression from you by September 12, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon the environment (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

Sincerely,



Justin J. Marks
*Counsel to South Carolina Central Railroad
Company, LLC*

Enclosure



End
Abandonment
Val Station 41
+60

Val Station
0+00/59+79

Dummy Line

Begin
Abandonment
MP 0.60/Val
Station 91+21

GPA Lead Track

End
Abandonment
Val Station 41
+61

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June 25, 2025

VIA EMAIL AND/OR FIRST-CLASS MAIL

ALL AGENCIES ON THE
ATTACHED SERVICE LIST

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, Georgia
Surface Transportation Board Docket No. AB 312 (Sub. No. 6)

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The majority of the Subject Line is situated on 6th Street in Columbus, GA and the Georgia Department of Transportation ("GDOT") owns the physical assets of the Subject Line. SCRF will salvage the Subject Line on behalf of GDOT and following the abandonment of the Subject Line, SCRF will release its permanent freight easement.

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Based upon information in SCRF's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental report as required by applicable STB regulations, we are consulting with appropriate agencies such as yours as to any concerns which they may have as to the environmental effects of the proposed abandonment.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

June 25, 2025
Page 2

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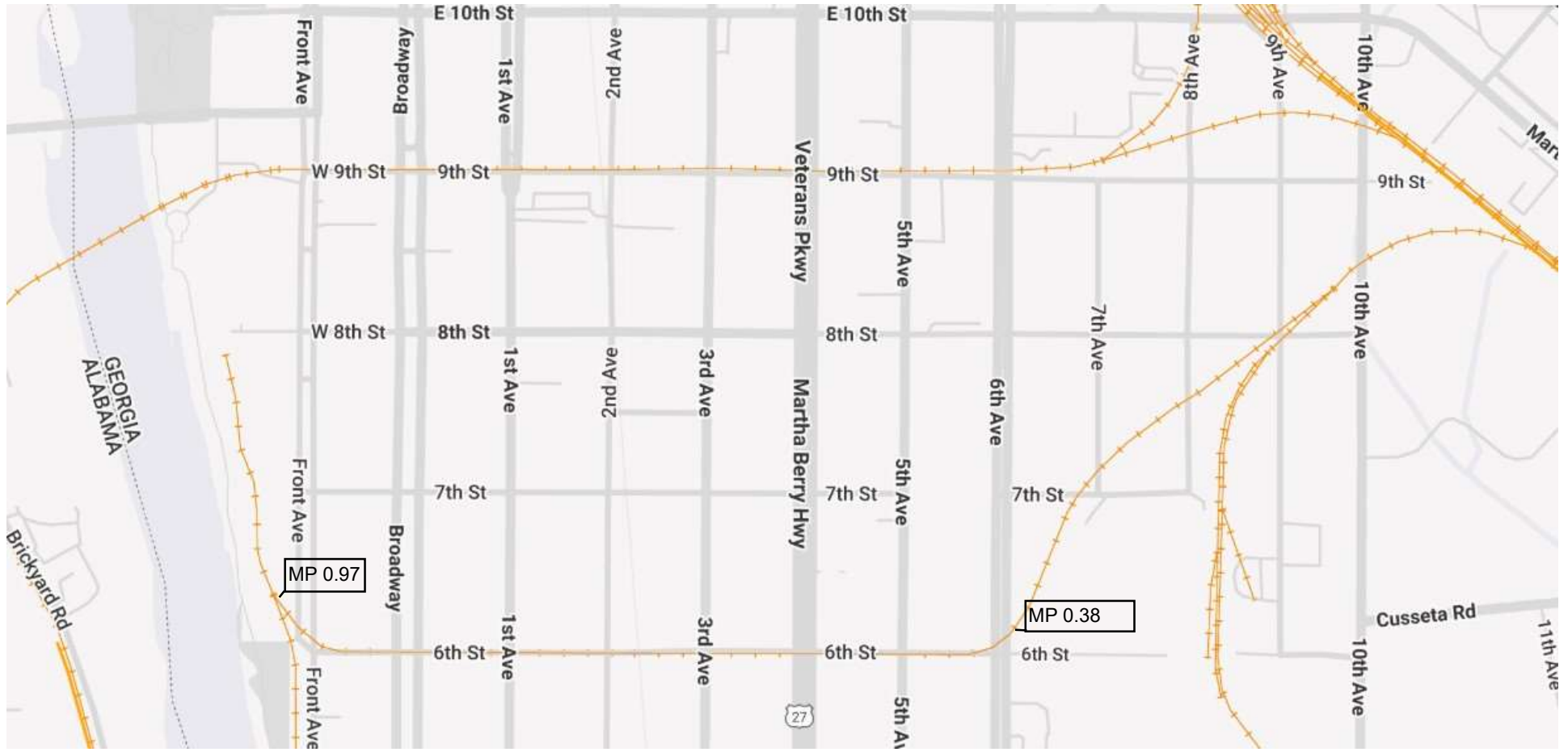
Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, reading "Justin J. Marks". The signature is written in a cursive, flowing style.

Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure



Environmental Agency List

U.S. Department of Agriculture Natural Resources Conservation Service Georgia State Office 355 E. Hancock Ave Athens, GA 30601-2775	Kevin J. McOmber, PE, Regional Administrator Office of the Regional Administrator US EPA Region 4 Atlanta Federal Center 61 Forsyth Street SW Atlanta, GA 30303-8960 McOmber.kevin@epa.gov
United States Department of Agriculture Natural Resources Conservation Service Office of the Chief 1400 Independence Ave., SW Room 5105-A Washington, DC 20250	U.S. Army Corp of Engineers South Atlantic Division, Savannah District 100 W Oglethorpe Ave Savannah, GA 31401-3604 cesas-cco@usace.army.mil
National Park Service 1849 C Street, NW Washington, DC 20240	Darrell Echols, Acting Regional Director Region 2 South Atlantic-Gulf National Park Service 100 Alabama Street, SW 1924 Building Atlanta, GA 30303
United States Fish & Wildlife Service Southeast Region 4 1875 Century Boulevard Suite 400 Atlanta, GA 30345	National Geodetic Survey rrae@noaa.gov
Georgia Department of Natural Resources Coastal Resources Division One Conservation Way Suite 300 Brunswick, GA 31520-8687 kelie.moore@dnr.ga.gov	Georgia Environmental Protection Division 2 Martin Luther King Jr. Drive SE Suite 1456, East Tower Atlanta, GA 30334 askepd@gaepd.org
Georgia Department of Natural Resources 2 Martin Luther King J. Dr. Suite 1252 Atlanta, VA 30334	Georgia Department of Transportation Intermodal Division Clement Solomon, Director One Georgia Center 600 West Peachtree St NW, 6th Floor Atlanta, GA 30308
The Hon. B.H. "Skip" Henderson III	City Manager's Office

Executive Assistant: Kimberly Tharp Tharp.kimberly@columbusga.org	Brittney Lyles Lyles.brittney@columbusga.org
Georgia Department of Community Affairs Historic Preservation Office historicpreservation@dca.ga.gov	



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August 11, 2025

VIA EMAIL AND/OR FIRST-CLASS MAIL

ALL AGENCIES ON THE
ATTACHED SERVICE LIST

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To Whom it May Concern:

On June 25, 2025, South Carolina Central Railroad Company, LLC ("SCRF") submitted a letter to you notifying you of its intent to abandon a permanent freight easement on a line of railroad in Columbus, Muscogee County, Georgia. SCRF is sending this letter to renotify you of its intent to abandon to allow SCRF to correct an error in the description of the line and to expand the scope of its abandonment.

The "Subject Line" includes, the "Dummy Line" extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. The Subject Line traverses through United State Postal Zip Code 31901. A map of the Subject Line is enclosed hereto.

Georgia Department of Transportation ("GDOT") owns the physical assets of the Subject Line. SCRF will salvage the Subject Line on behalf of GDOT and following the abandonment of the Subject Line, SCRF will release its permanent freight easement.

SCRF intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable SCRF to abandon the Subject Line, on or after October 3, 2025, in STB Docket No. AB 312 (Sub. No. 6).¹

Based upon information in SCRF's possession, the Subject Line does not contain federally granted rights of way.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

August 11, 2025
Page 2

In advance of preparing an environmental report as required by applicable STB regulations, we are consulting with appropriate agencies such as yours as to any concerns which they may have as to the environmental effects of the proposed abandonment.

We would appreciate an expression from you by September 12, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon the environment (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

Sincerely,



Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure



End
Abandonment
Val Station 41
+60

Val Station
0+00/59+79

Dummy Line

Begin
Abandonment
MP 0.60/Val
Station 91+21

GPA Lead Track

End
Abandonment
Val Station 41
+61

Environmental Agency List

Nelson Velazquez Gotay, Soil Scientist U.S. Department of Agriculture Natural Resources Conservation Service Georgia State Office 355 E. Hancock Ave Athens, GA 30601-2775 Nelson.velazquezgotay@usda.gov	Kevin J. McOmber, PE, Regional Administrator Office of the Regional Administrator US EPA Region 4 Atlanta Federal Center 61 Forsyth Street SW Atlanta, GA 30303-8960 McOmber.kevin@epa.gov
United States Department of Agriculture Natural Resources Conservation Service Office of the Chief 1400 Independence Ave., SW Room 5105-A Washington, DC 20250	U.S. Army Corp of Engineers South Atlantic Division, Savannah District 100 W Oglethorpe Ave Savannah, GA 31401-3604 cesas-cco@usace.army.mil
National Park Service 1849 C Street, NW Washington, DC 20240	Darrell Echols, Acting Regional Director Region 2 South Atlantic-Gulf National Park Service 100 Alabama Street, SW 1924 Building Atlanta, GA 30303
United States Fish & Wildlife Service Southeast Region 4 1875 Century Boulevard Suite 400 Atlanta, GA 30345	National Geodetic Survey rrae@noaa.gov
Georgia Department of Natural Resources Coastal Resources Division One Conservation Way Suite 300 Brunswick, GA 31520-8687 kelie.moore@dnr.ga.gov	J. Tilden Bembry Georgia Environmental Protection Division Water Protection Branch 2 Martin Luther King Jr. Drive SE Suite 1456, East Tower Atlanta, GA 30334 askep@gaepd.org Tilden.bembry@dnr.ga.gov
Georgia Department of Natural Resources Environmental Protection Division 2 Martin Luther King J. Dr. Suite 1252 Atlanta, VA 30334 william.lucas@dnr.ga.gov	Georgia Department of Transportation Intermodal Division Clement Solomon, Director One Georgia Center 600 West Peachtree St NW, 6th Floor Atlanta, GA 30308

The Hon. B.H. “Skip” Henderson III Executive Assistant: Kimberly Tharp Tharp.kimberly@columbusga.org	City Manager’s Office Brittney Lyles Lyles.brittney@columbusga.org Columbus Consolidated Government Pamela Hodge Phodge@columbusga.org R. Vance Beck, P.E. Beck.ronald@columbusga.org
Georgia Department of Community Affairs Historic Preservation Division Margot McLaughlin, Environmental Review Historian Margot.mclaughlin@dca.ga.gov Noah Bryant, Compliance Review Archaeologist Noah.Bryant@dca.ga.gov	

ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT C

AGENCY RESPONSES

Marks, Justin J.

From: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Sent: Wednesday, June 25, 2025 1:29 PM
To: Marks, Justin J.
Cc: Long, James
Subject: RE: SCRF Railroad Abandonment in Columbus, Muscogee County, GA
Attachments: SCRF_coastal_zone_consultation_letter.pdf

EXTERNAL EMAIL: The sender (Kelie.Moore@dnr.ga.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Muscogee County is outside of Georgia's coastal management area and the proposed abandonment has no reasonably foreseeable effects to coastal uses or resources. Thank you.

Kelie Moore
Federal Consistency Coordinator
Coastal Resources Division
Office: 912-264-7218 | Cell: 912-602-1339
[Facebook](#) • [Twitter](#)
[Buy a hunting or fishing license today!](#)

A division of the
GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Wednesday, June 25, 2025 1:26 PM
To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Subject: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon:

Please see the attached letter related to the abandonment of a rail line in Columbus, GA.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com

Marks, Justin J.

From: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Sent: Tuesday, August 12, 2025 7:59 AM
To: Marks, Justin J.
Cc: Long, James
Subject: RE: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

EXTERNAL EMAIL: The sender (Kelie.Moore@dnr.ga.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Mr. Marks:

Thank you for the additional information. It does not change our CZM review outcome. The Georgia Coastal Management Program has no objection to this project.

Kelie Moore
Federal Consistency Coordinator
Coastal Resources Division
Office: 912-264-7218 | Cell: 912-602-1339
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From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Monday, August 11, 2025 3:09 PM
To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Cc: Long, James <james.long1@dnr.ga.gov>
Subject: RE: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Moore:

Please see the attached letter expanding the scope of SCRF's planned abandonment of its permanent freight easement on a line of railroad in Columbus, GA.

I do not believe it will change your previous comments, but just in case, I wanted to consult with you on this revision to the abandonment.

Thanks,

Justin

Justin J. Marks
Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com

From: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Sent: Wednesday, June 25, 2025 1:29 PM
To: Marks, Justin J. <jmarks@ClarkHill.com>
Cc: Long, James <james.long1@dnr.ga.gov>
Subject: RE: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

EXTERNAL EMAIL: The sender (Kelie.Moore@dnr.ga.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Muscogee County is outside of Georgia's coastal management area and the proposed abandonment has no reasonably foreseeable effects to coastal uses or resources. Thank you.

Kelie Moore
Federal Consistency Coordinator
Coastal Resources Division
Office: 912-264-7218 | Cell: 912-602-1339
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[Buy a hunting or fishing license today!](#)

A division of the
GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Wednesday, June 25, 2025 1:26 PM
To: Moore, Kelie <Kelie.Moore@dnr.ga.gov>
Subject: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon:

Please see the attached letter related to the abandonment of a rail line in Columbus, GA.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com

Marks, Justin J.

From: CESAS-CCO, SAS <CESAS-CCO@usace.army.mil>
Sent: Wednesday, August 13, 2025 12:22 PM
To: Marks, Justin J.; McOmber.kevin@epa.gov; CESAS-CCO, SAS; rrae@noaa.gov; askepd@gaepd.org; Tharp.kimberly@columbusga.org; Lyles.brittney@columbusga.org
Cc: Public Affairs, SAM
Subject: RE: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

EXTERNAL EMAIL: The sender (CESAS-CCO@usace.army.mil) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Good afternoon,

This crosses one of the Mobile District's federal projects (the Chattahoochee River). Therefore, your previous email was forwarded to the Mobile District CESAM-PA@usace.army.mil.

If you'd like to talk to the Mobile District's Office of Counsel, they can be reached at (251) 690-2491.

V/r,
U.S. Army Corps of Engineers, Savannah District
Corporate Communication Office

From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Wednesday, June 25, 2025 1:28 PM
To: McOmber.kevin@epa.gov; CESAS-CCO, SAS <CESAS-CCO@usace.army.mil>; rrae@noaa.gov; askepd@gaepd.org; Tharp.kimberly@columbusga.org; Lyles.brittney@columbusga.org
Subject: [Non-DoD Source] SCRF Railroad Abandonment in Columbus, Muscogee County, GA

Good afternoon:

Please see the attached letter related to the abandonment of a rail line in Columbus, GA.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com

Marks, Justin J.

From: Ronald V Beck <Beck.Ronald@columbusga.org>
Sent: Thursday, June 26, 2025 10:36 AM
To: Marks, Justin J.
Cc: Pam Hodge; Will Johnson; Brennan J Hoy
Subject: FW: [EXTERNAL] SCRF Railroad Abandonment in Columbus, Muscogee County, GA
Attachments: SCRF_letter_to_Environmental_Agencies_2025_06_25.pdf

EXTERNAL EMAIL: The sender (Beck.Ronald@columbusga.org) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Columbus Consolidated Government has no environmental concerns with the track removal. Thanks

R. Vance Beck, P.E.
Director of Engineering
Columbus Consolidated Government
420 10th Street Columbus, GA 31901
Beck.Ronald@Columbusga.org
706-225-3961

From: Pam Hodge <PHodge@columbusga.org>
Sent: Wednesday, June 25, 2025 2:31 PM
To: Will Johnson <WJohnson@columbusga.org>; Ronald V Beck <Beck.Ronald@columbusga.org>; Brennan J Hoy <Hoy.Brennan@columbusga.org>
Subject: FW: [EXTERNAL] SCRF Railroad Abandonment in Columbus, Muscogee County, GA

FYI. Our 6th Street project!

Pamela Hodge
Deputy City Manager of Finance, Planning & Development
Columbus Consolidated Government
420 10th Street
Columbus, GA 31901
phodge@columbusga.org
Office: (706) 225-4206



From: Brittney L Lyles <Lyles.Brittney@columbusga.org>
Sent: Wednesday, June 25, 2025 2:12 PM
To: Lisa Goodwin <LGoodwin@columbusga.org>; Pam Hodge <PHodge@columbusga.org>
Subject: FW: [EXTERNAL] SCRF Railroad Abandonment in Columbus, Muscogee County, GA

Please see the email below along with the attached document.

Thank you,



Brittney Lyles, M.P.A., Notary Public
Chief of Staff, City Manager's Office
Columbus Consolidated Government
1111 1st Avenue | Columbus, GA 31901
Office: (706) 653-4029 | Direct: (706) 225-3123
Lyles.Brittney@columbusga.org | www.columbusga.gov

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From: Marks, Justin J. <jmarks@ClarkHill.com>

Sent: Wednesday, June 25, 2025 1:28 PM

To: McOmber.kevin@epa.gov; cesas-cco@usace.army.mil; rrae@noaa.gov; askepd@gaepd.org; Kimberly Tharp <Tharp.Kimberly@columbusga.org>; Brittney L Lyles <Lyles.Brittney@columbusga.org>

Subject: [EXTERNAL] SCRF Railroad Abandonment in Columbus, Muscogee County, GA

Good afternoon:

Please see the attached letter related to the abandonment of a rail line in Columbus, GA.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004

+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)

jmarks@clarkhill.com | www.clarkhill.com



Natural Resources Conservation Service

U.S. DEPARTMENT OF AGRICULTURE

Georgia State Office

355 East Hancock Ave
Athens, GA 30601

June 11, 2025

Justin J. Marks, Counsel to South Carolina Central Railroad Company, LLC
Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, D.C. 20004

Re: Executive Order 12372 Request for Abandonment Exemption Rail Line, City of Columbus, Muscogee County, Georgia

Dear Mr. Marks:

This letter responds to your request for information on the possible impacts of the proposed abandonment of a permanent rail line project may have on land use, conservation, water quality and other general environmental concerns that may be of interest to our agency. The following outlines our concerns with the proposed project with regards to farmland protection, and Natural Resources Conservation Service (NRCS) watershed dams and project easements.

Farmland Protection

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For FPPA purposes, farmland includes areas located within soil map units rated as prime farmland, unique farmland, or land of statewide or local importance not currently in urban/built up land use. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land uses, but not water or urban built-up land. It should be noted that the FPPA does not authorize the Federal Government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. It is our understanding that the proposed project involves federal funds or assistance and thus could be subject to this assessment. **However, this site is completely contained within a U.S. Census Bureau designated urban area (Columbus, GA 19099) and is thus exempt from this assessment. You need to take no further action for FPPA purposes.**

NRCS Watershed Dams

More than 50 years ago, the U.S. Department of Agriculture was authorized by Congress to help local communities with flood control and watershed protection through the Watershed Program (PL-534 Flood Control Act of 1944 and PL-566 Watershed Protection and Flood Prevention Act). As a result, local communities, with NRCS assistance, have constructed over 11,000 dams in 47 states since 1948. These dams were originally constructed for protection of farmlands from flooding impacts. In 2000, PL-566 was amended to provide NRCS authorization to assist communities with rehabilitation of their aging dams. The legislation authorizes NRCS to work with local communities and watershed project sponsors to address public health and safety concerns and potential environmental impacts of aging dams.

We have reviewed our records and have determined that there are no such structures downstream of the proposed project that could be affected by these activities.

NRCS Easements

NRCS easements relate to our Wetland Reserve Program and the Farm and Ranchland Protection Program. **We have reviewed our records and have determined that there are no such easements downstream or in the near vicinity of the proposed project that could be affected by these activities.**

NRCS appreciates this opportunity to comment. If you have questions or need any additional information, please contact me at nelson.velazquezgotay@usda.gov.

Sincerely,

NELSON A. VELÁZQUEZ GOTAY
SOIL SCIENTIST

cc: Dennis Brooks, Assistant State Conservationist (FO), NRCS, Griffin, GA
Matthew Hayes, District Conservationist, NRCS, Buena Vista, GA
Michael Henderson, Resource Soil Scientist, NRCS, Griffin, GA

Marks, Justin J.

From: Velazquez-Gotay, Nelson - FPAC-NRCS, GA <Nelson.Velazquez-Gotay@usda.gov>
Sent: Tuesday, August 12, 2025 8:07 AM
To: Marks, Justin J.
Cc: Hankins, Gary - FPAC-NRCS, GA
Subject: RE: Early Coordination Request EO12372 - Muscogee County

EXTERNAL EMAIL: The sender (Nelson.Velazquez-Gotay@usda.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Morning Justin!

I don't have any additional comments; the changes don't affect the intergovernmental review since the project is in an urban area.

From our part everything looks good.

Have a great day!

From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Monday, August 11, 2025 3:24 PM
To: Velazquez-Gotay, Nelson - FPAC-NRCS, GA <Nelson.Velazquez-Gotay@usda.gov>
Cc: Hankins, Gary - FPAC-NRCS, GA <gary.hankins@usda.gov>
Subject: RE: Early Coordination Request EO12372 - Muscogee County

Nelson:

Thank you for your email below. Attached is a letter to re-notify you of SCRF's abandonment to correct an error in the line description and to expand the scope of the easement to be abandoned. Specifically, you will see that we had mis-identified the milepost 0.38 that marks the beginning of the abandonment. That milepost should have been labeled 0.60 and will continue to be the beginning of the abandonment. However, the end points of the abandonment will change.

If you have no additional comments, no issue. But if you have further comment, please let me know.

Thank you,

Justin

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com

From: Velazquez-Gotay, Nelson - FPAC-NRCS, GA <Nelson.Velazquez-Gotay@usda.gov>
Sent: Friday, July 11, 2025 9:58 AM
To: Marks, Justin J. <jmarks@ClarkHill.com>
Cc: Hankins, Gary - FPAC-NRCS, GA <gary.hankins@usda.gov>
Subject: Early Coordination Request EO12372 - Muscogee County

EXTERNAL EMAIL: The sender (Nelson.Velazquez-Gotay@usda.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Mr. Marks,

The attached document is the intergovernmental review to this early coordination request (EO12372) for rail line abandonment exemption project in Muscogee County.

Cordially, Nelson

Nelson Velázquez Gotay

Soil Scientist
NRCS | Soils Teams
Athens State Office



U.S. DEPARTMENT OF AGRICULTURE

Natural Resources Conservation Services
355 E Hancock Ave, Athens, GA, 30601
706-546-2056

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Marks, Justin J.

From: Bembry, Tilden <Tilden.Bembry@dnr.ga.gov>
Sent: Thursday, June 26, 2025 10:53 AM
To: Marks, Justin J.
Cc: ask epd; Berry, Michael; Sapp, Joseph
Subject: Re: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

EXTERNAL EMAIL: The sender (Tilden.Bembry@dnr.ga.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Mr. Marks,

If this project disturbs one acre or more, it will require coverage under the General NPDES Permit for Storm Water Discharges Associated with Construction Activity. Part IV of the Permit requires the submittal of the Erosion, Sedimentation and Pollution Control Plan to EPD's Watershed Protection Branch. If state waters buffers are planned to be impacted and the activity is not an exempted buffer encroachment, a buffer variance may be necessary. Information and applicable forms for the stream buffer variance and the NPDES construction general permit can be found on our website at <http://epd.georgia.gov/>

Should the United States Army Corps of Engineers determine that an individual permit under Section 404 of the Clean Water Act is required for the project; a Section 401 Water Quality Certification should concurrently be sought from the Georgia Environmental Protection Division.

If you have additional questions pertaining to NPDES or State water buffers, please contact Michael Berry at (470) 524-4621. For questions pertaining to 401 Water Quality Certification, please contact David Hedeem, with the Wetlands Unit at (470) 427-2730.

J. Tilden Bemby
District Manager
West Central District, EPD
Office: 478-751-6612
Cell: 478-291-6509



From: ask epd <ask.epd@dnr.ga.gov>
Sent: Thursday, June 26, 2025 8:52 AM
To: Bemby, Tilden <Tilden.Bembry@dnr.ga.gov>
Subject: FW: SCRF Railroad Abandonment in Columbus, Muscogee County, GA



From: Marks, Justin J. <jmarks@ClarkHill.com>

Sent: Wednesday, June 25, 2025 1:28 PM

To: McOmber.kevin@epa.gov; cesas-cco@usace.army.mil; rrae@noaa.gov; ask epd <ask.epd@dnr.ga.gov>;
Tharp.kimberly@columbusga.org; Lyles.brittney@columbusga.org

Subject: SCRF Railroad Abandonment in Columbus, Muscogee County, GA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon:

Please see the attached letter related to the abandonment of a rail line in Columbus, GA.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004

+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)

jmarks@clarkhill.com | www.clarkhill.com

**ENVIRONMENTAL/HISTORIC
REPORT**

EXHIBIT D

NEWSPAPER NOTICE

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Cols	Depth
	IPL0263626	Legal Ad - IPL0263626		2.0	92.0L

ATTENTION: Justin Marks
1001 Pennsylvania Ave. N.W.
Washington, DC 20004
jmarks@clarkhill.com

To whom it may concern:

This is to certify the legal advertisement in the above stated case has been published in the Columbus Ledger-Enquirer, legal organ of Muscogee County on

1.0 insertion(s) published on:
08/15/25 Digital

Re-Notice of Joint Intent to Abandon and Discontinue Rail Service

South Carolina Central Railroad Company, LLC (SCRF) and the Georgia Southwestern Railroad, Inc. (GSWR) give notice that on or after October 3, 2025, SCRF intends to file with the Surface Transportation Board (STB), Washington, DC, a notice of exemption under 49 CFR part 1152, subpart F - Exempt Abandonments and Discontinuances permitting the abandonment of a permanent freight easement over a 2.17-mile line of railroad (the Line) to include, the "Dummy Line" extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. In addition, jointly with SCRF's abandonment filing, GSWR intends to file a notice of exemption under 49 CFR part 1152, subpart F, to authorize the discontinuance of GSWR's common carrier operations over the Line. The Line traverses through United States Postal Service ZIP Code 31901 in Columbus, Muscogee County, Georgia. The SCRF abandonment and GSWR discontinuance exemption proceedings will be docketed as No. AB 312 (Sub-No. 6X) and AB 1000 (Sub-No. 5X), respectively.

The STB's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA) in connection with SCRF's proposed abandonment of the Line, which will normally be available 25 days after the filing of the abandonment notice of exemption. An EA is generally not required for a discontinuance notice of exemption, as GSWR intends to file. Comments on environmental and energy matters bearing on the EA associated with SCRF's abandonment notice of exemption should be filed no later than 15 days after the EA becomes available to the public and will be addressed in an STB decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to OEA, Surface Transportation Board, Washington, DC or by calling OEA at (202) 245-0291.

Appropriate offers of financial assistance to continue rail service can be filed with the STB. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the STB. Any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance where applicable) must be filed directly with the STB's Office of Proceedings either via e-filing or addressed to 395 E. Street S.W., Washington, DC 20423-0001 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicants' representative [See 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance, public use or trails use may be directed to the STB's Office of Public Assistance, Governmental Affairs, and Compliance at (202) 245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Justin J. Marks, Clark Hill PLC, 1001 Pennsylvania Ave. N.W. Suite 1300 South, Washington, DC 20004; jmarks@clarkhill.com.

IPL0263626
Aug 15 2025

[Print Tearsheet Link](#)

[Marketplace Link](#)

Sherry Chasteen

Sworn to and subscribed before me on

Aug 15, 2025, 10:13 AM ED



Online Notary Public. This notarial act involved the use of online audio/video communication technology. Notarization facilitated by SIGNIXI

Re-Notice of Joint Intent to Abandon and Discontinue Rail Service

South Carolina Central Railroad Company, LLC (SCRF) and the Georgia Southwestern Railroad, Inc. (GSWR) give notice that on or after October 3, 2025, SCRF intends to file with the Surface Transportation Board (STB), Washington, DC, a notice of exemption under 49 CFR part 1152, subpart F - Exempt Abandonments and Discontinuances permitting the abandonment of a permanent freight easement over a 2.17-mile line of railroad (the Line) to include, the "Dummy Line" extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. In addition, jointly with SCRF's abandonment filing, GSWR intends to file a notice of exemption under 49 CFR part 1152, subpart F, to authorize the discontinuance of GSWR's common carrier operations over the Line. The Line traverses through United States Postal Service ZIP Code 31901 in Columbus, Muscogee County, Georgia. The SCRF abandonment and GSWR discontinuance exemption proceedings will be docketed as No. AB 312 (Sub-No. 6X) and AB 1000 (Sub-No. 5X), respectively.

The STB's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA) in connection with SCRF's proposed abandonment of the Line, which will normally be available 25 days after the filing of the abandonment notice of exemption. An EA is generally not required for a discontinuance notice of exemption, as GSWR intends to file. Comments on environmental and energy matters bearing on the EA associated with SCRF's abandonment notice of exemption should be filed no later than 15 days after the EA becomes available to the public and will be addressed in an STB decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to OEA, Surface Transportation Board, Washington, DC or by calling OEA at (202) 245-0291.

Appropriate offers of financial assistance to continue rail service can be filed with the STB. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the STB. Any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance where applicable) must be filed directly with the STB's Office of Proceedings either via e-filing or addressed to 395 E. Street S.W., Washington, DC 20423-0001 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicants' representative [See 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance, public use or trails use may be directed to the STB's Office of Public Assistance, Governmental Affairs, and Compliance at (202) 245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Justin J. Marks, Clark Hill PLC, 1001 Pennsylvania Ave. N.W. Suite 1300 South, Washington, DC 20004; jmarks@clarkhill.com.

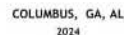
IPL0263626

Aug 15 2025

**ENVIRONMENTAL/HISTORIC
REPORT**

EXHIBIT E

TOPOGRAPHICAL MAP



ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT F

SHPO CORRESPONDENCE

Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

June 25, 2025

Georgia Department of Community Affairs
Historic Preservation Office

ER@dca.ga.gov

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, Georgia
Surface Transportation Board Docket No. AB 312 (Sub. No. 6)

To Whom it May Concern:

This letter is to advise you that South Carolina Central Railroad Company, LLC ("SCRF") intends to file a notice of exemption for SCRF to abandon a permanent freight easement of approximately 0.58 miles of rail line (the "Subject Line") from approximately milepost 0.38 to the switch at approximately milepost 0.97 in Columbus, Muscogee County, Georgia.

The majority of the Subject Line is situated on 6th Street in Columbus, GA and the Georgia Department of Transportation ("GDOT") owns the physical assets of the Subject Line. SCRF will salvage the Subject Line on behalf of GDOT and following the abandonment of the Subject Line, SCRF will release its permanent freight easement.

The Subject Line traverses through United State Postal Zip Code 31901. A map of the Subject Line is enclosed hereto.

SCRF intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable SCRF to abandon the Subject Line, on or after August 25, 2025, in STB Docket No. AB 312 (Sub. No. 6).¹

Based upon information in SCRF's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental and historical report as required by applicable STB regulations, we are consulting with the Historic Preservation Division as to any concerns which you may have as to the effects on historical resources of the proposed abandonment.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

June 25, 2025
Page 2

We would appreciate an expression from you by August 1, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon historical resource (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

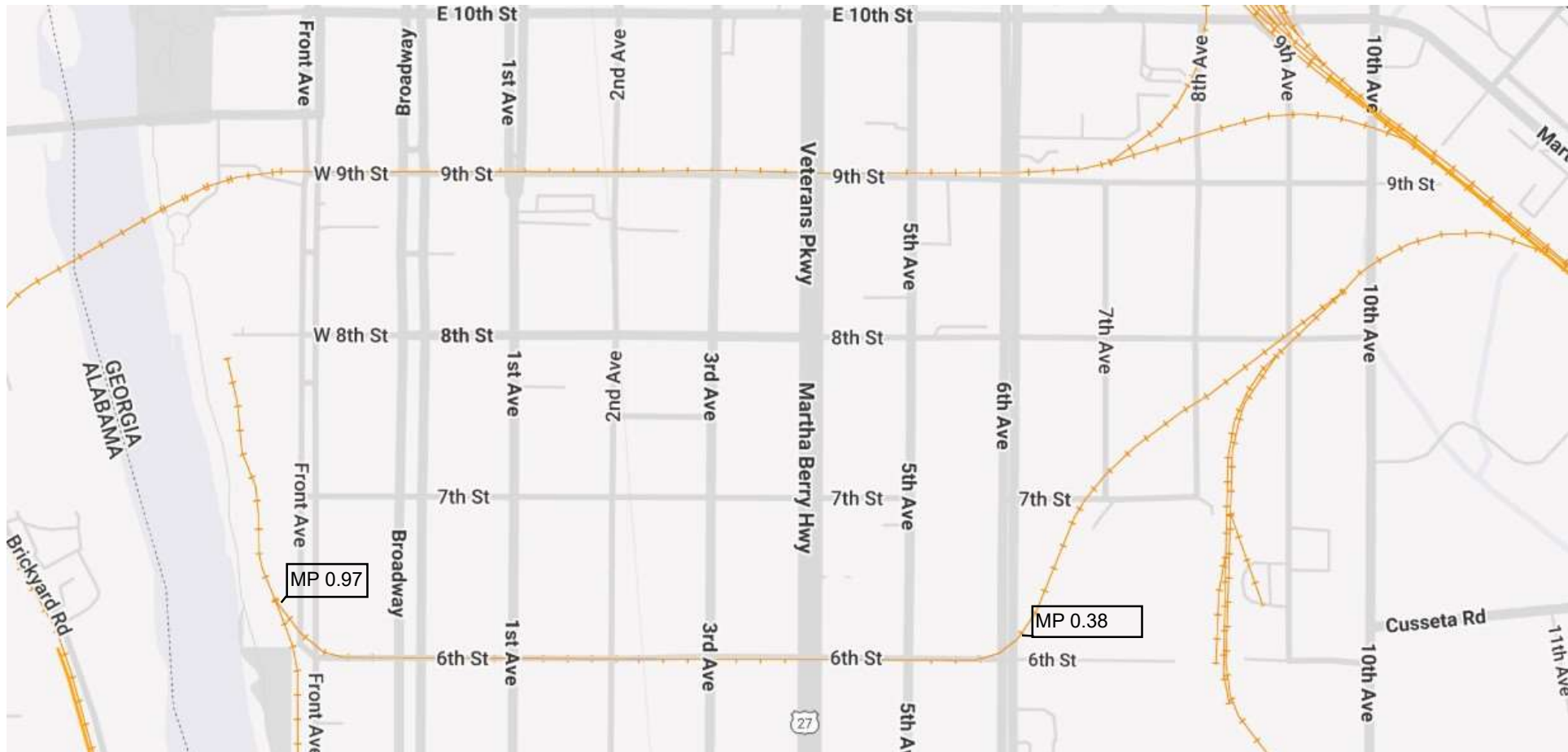
Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Justin J. Marks". The signature is written in a cursive, flowing style.

Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure





Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

August 11, 2025

Georgia Department of Community Affairs
Historic Preservation Office

ER@dca.ga.gov

Re: South Carolina Central Railroad Company, LLC – Abandonment Exemption –
in Muscogee County, Georgia
Surface Transportation Board Docket No. AB 312 (Sub. No. 6)
Re-Notice of Intent to Abandon

To Whom it May Concern:

On June 25, 2025, South Carolina Central Railroad Company, LLC ("SCRF") submitted a letter to you notifying you of its intent to abandon a permanent freight easement on a line of railroad in Columbus, Muscogee County, Georgia. SCRF is sending this letter to renotify you of its intent to abandon to allow SCRF to correct an error in the description of the line and to expand the scope of its abandonment.

The "Subject Line" includes, the "Dummy Line" extending from Milepost 0.60/ Value Station 91+21 to the end of the line at Value Station 41+60 and the Georgia Power Lead Track extending from Value Station 0+00/59+79 to the end of the line at Value Station 41+61. The Subject Line traverses through United State Postal Zip Code 31901. A map of the Subject Line is enclosed hereto.

SCRF intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable SCRF to abandon the Subject Line, on or after October 3, 2025, in STB Docket No. AB 312 (Sub. No. 6).¹

Based upon information in SCRF's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental and historical report as required by applicable STB regulations, we are consulting with the Historic Preservation Division as to any concerns which you may have as to the effects on historical resources of the proposed abandonment.

¹ The rail carrier that operates the Subject Line, Georgia Southwestern Railroad, Inc. ("GSWR"), will file simultaneously to discontinue rail services. However, GSWR is not required to complete an environmental/historical report.

August 11, 2025
Page 2

We would appreciate an expression from you by September 12, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon historical resource (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Justin J. Marks". The signature is written in a cursive, flowing style.

Justin J. Marks
Counsel to South Carolina Central Railroad
Company, LLC

Enclosure



End
Abandonment
Val Station 41
+60

Val Station
0+00/59+79

Dummy Line

Begin
Abandonment
MP 0.60/Val
Station 91+21

GPA Lead Track

End
Abandonment
Val Station 41
+61



GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

July 28, 2025

Justin Marks
Counsel
South Carolina Central Railroad Company, LLC
621 Field Pond Road
Darlington, South Carolina 29540

**RE: Abandon and Remove Rail Line, Sixth Street,
from Milepost 0.38 to Milepost 0.97, Columbus
Muscogee, Georgia
HP-250627-001**

Dear Mr. Marks:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the Surface Transportation Board (STB) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of South Carolina Central Railroad Company (SCRF) abandoning an approximately 0.58-mile segment of the Georgia & Alabama (GAAL) Railroad embedded within the roadway of Sixth Street in Columbus from milepost (MP) 0.38 located east of Sixth Avenue to MP 0.97 located west of Front Avenue. It is HPD's understanding that as part of the abandonment process, SCRF intends to abandon its freight operating easement and remove/salvage the rail line within the roadway and repaving the road. Based on the information provided and desktop research, HPD finds that the GAAL Railroad is eligible for listing in the National Register of Historic Places (NRHP) and that the railroad contributes to the NRHP-listed Columbus Historic District, within which it is located.

As proposed, it is HPD's opinion that the subject project constitutes an **adverse effect** to historic properties that are eligible for or listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2). Specifically, the abandonment and removal of a portion of the GAAL Railroad, an NRHP-eligible property and a contributing property within a NRHP-listed historic district, is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.

HPD would like to note that this determination of an adverse effect is not the end of the Section 106 consultation process and that the process should be completed prior to commencing the project. The next step in the process is to consider options to avoid or minimize the adverse effect on historic resources associated with this project. *If the scope of work (SOW) for this project can be changed* so that it conforms to the Secretary's *Standards* (i.e., retain the existing historic railroad corridor along Sixth Street or similar), please forward the updated SOW to HPD for review and comment. *If the SOW cannot be changed*, provide HPD with documentation explaining the reason(s) why the adverse effect cannot be avoided or minimized (i.e., a cost analysis, funding requirements, safety issues, etc.).



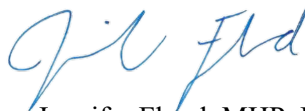
If the adverse effect remains after avoidance/minimization options have been considered, please complete the following steps, as applicable to this project, to resolve the adverse effect, complete the consultation process, and continue with the project:

- Notify the Advisory Council on Historic Preservation (ACHP): the ACHP must be notified of the adverse effect determination; the federal agency should utilize the ACHP's e-notification system available here: <https://www.achp.gov/e106-email-form>; ACHP notification is separate from the ongoing Section 106 consultation with HPD on this project and can be accomplished concurrently with the next step.
- Determine Mitigation: mitigation is measures that ensure a local preservation benefit, despite the loss or damage to historic properties and can include a variety of components; in consultation with HPD and other consulting parties, the federal agency should determine appropriate mitigation measures and incorporate those measures as stipulations in a draft Memorandum of Agreement (MOA).
- Draft a MOA: a MOA is an agreement document that sets out measures to resolve the adverse effect through mitigation; the federal agency should visit the ACHP's *Guidance on Agreement Documents* webpage, found here: <https://www.achp.gov/initiatives/guidance-agreement-documents> and utilize the MOA template found therein.
- Provide the MOA Draft(s) to HPD for Review: all agreement document drafts are subject to a 30-day review period that begins upon receipt of the document; HPD recommends the agency utilize a similar 30-day period to provide responsive revisions for each draft to HPD to reduce the length of time it takes to finalize the document.

Once appropriate mitigation to resolve the adverse effect is determined, in consultation with all parties, and the MOA has been executed (signed by all parties), the project can commence provided the need for the subject property to accomplish the mitigation outlined in the MOA is complete. If the agency decides additional discussion of the project or the provided comments is warranted, HPD is available for further technical assistance consultation.

We look forward to working with you as this project progresses. Please refer to project number **HP-250627-001** in any future correspondence regarding this project. If we may be of further assistance, please contact Margot McLaughlin, Environmental Review Historian, at Margot.McLaughlin@dca.ga.gov or (404) 679-4839 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404)-679-0649.

Sincerely,



Jennifer Flood, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

JAF/mem

cc: Alan Tabachnick, STB
Stephanie Cherry-Farmer, DCA/HPD
Allison Slocum, River Valley Regional Commission
Rebecca White, DCA Regional Services, Region 8



GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

September 10, 2025

Justin Marks
Counsel
South Carolina Central Railroad Company, LLC
621 Field Pond Road
Darlington, South Carolina 29540

**RE: Abandon and Remove Rail Line, Sixth Street,
from Milepost 0.38 to Milepost 0.97, Columbus
Muscogee, Georgia
HP-250627-001**

Dear Mr. Marks:

The Historic Preservation Division (HPD) has received the additional information submitted concerning the above referenced project. Our comments are offered to assist the Surface Transportation Board (STB) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of the South Carolina Central Railroad Company (SCRF) abandoning an approximately 0.58-mile segment of the Georgia & Alabama (GAAL) Railroad embedded within the roadway of Sixth Street in Columbus from milepost (MP) 0.38 located east of Sixth Avenue to MP 0.97 located west of Front Avenue. It is HPD's understanding that as part of the abandonment process, SCRF intends to abandon its freight operating easement and remove/salvage the rail line within the roadway and repaving the road. As noted in our letter dated July 28, 2025, the project was previously determined to have an adverse effect on the National Register of Historic Places (NRHP)-eligible GAAL Railroad and the NRHP-listed Columbus Historic District, within which the GAAL Railroad is located and to which it contributes.

The current submitted information consists of an updated project description and scope of work (SOW). It is HPD's understanding that the subject project has added abandoning an unknown length of a "Dummy Line" which is also embedded within the roadway of Sixth Street and extends from MP 0.60 at Sixth Street's intersection with Sixth Avenue to the end of the "Dummy Line" near Eighth Street to the abandonment of the GAAL Railroad line as described above. Based on the additional information provided and additional desktop research, HPD notes that the "Dummy Line," as noted in the current submittal, is a contributing segment of the NRHP-eligible GAAL Railroad and is located within and contributes to the NRHP-listed Columbus Historic District. Therefore, it continues to be HPD's opinion that the subject project, as currently proposed, constitutes an **adverse effect** to historic properties that are listed in the NRHP, as defined in 36 CFR Part 800.5(a)(2).

HPD continues to note that this determination of an adverse effect is not the end of the Section 106 consultation process and that the process should be completed prior to commencing the project. As previously described in our July 28, 2025, response letter, we recommend the federal agency complete the following steps, as applicable to this project, to resolve the adverse effect, complete the consultation process, and continue with the project:

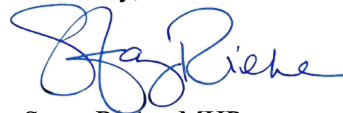


- Notify the Advisory Council on Historic Preservation (ACHP): the ACHP must be notified of the adverse effect determination; the federal agency should utilize the ACHP's e-notification system available here: <https://www.achp.gov/e106-email-form>; ACHP notification is separate from the ongoing Section 106 consultation with HPD on this project and can be accomplished concurrently with the next step.
- Determine Mitigation: mitigation is measures that ensure a local preservation benefit, despite the loss or damage to historic properties and can include a variety of components; in consultation with HPD and other consulting parties, the federal agency should determine appropriate mitigation measures and incorporate those measures as stipulations in a draft Memorandum of Agreement (MOA).
- Draft a MOA: a MOA is an agreement document that sets out measures to resolve the adverse effect through mitigation; the federal agency should visit the ACHP's *Guidance on Agreement Documents* webpage, found here: <https://www.achp.gov/initiatives/guidance-agreement-documents> and utilize the MOA template found therein.
- Provide the MOA Draft(s) to HPD for Review: all agreement document drafts are subject to a 30-day review period that begins upon receipt of the document; HPD recommends the agency utilize a similar 30-day period to provide responsive revisions for each draft to HPD to reduce the length of time it takes to finalize the document.

Once appropriate mitigation to resolve the adverse effect is determined, in consultation with all parties, and the MOA has been executed (signed by all parties), the project can commence provided the need for the subject property to accomplish the mitigation outlined in the MOA is complete. If the agency decides additional discussion of the project or the provided comments is warranted, HPD is available for further technical assistance consultation.

Please refer to project number **HP-250627-001** in any future correspondence regarding this project. If we may be of further assistance, please contact Margot McLaughlin, Environmental Review Historian, at Margot.McLaughlin@dca.ga.gov or (404) 679-4839 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404)-679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mem

cc: Alan Tabachnick, STB
Allison Slocum, River Valley Regional Commission
Rebecca White, DCA Regional Services, Region 8