

Before the
SURFACE TRANSPORTATION BOARD

ENTERED
Office of Proceedings
December 6, 2018
Part of
Public Record

STB Docket No. AB 312 (Sub No. 4X)

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

STB Docket No. AB 1000 (Sub-No. 4X)

GEORGIA SOUTHWESTERN RAILROAD, INC.
- DISCONTINUANCE EXEMPTION - IN TERRELL COUNTY, GA

JOINT ENVIRONMENTAL/HISTORIC REPORT

(color copies included)

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Attorneys for South Carolina Central
Railroad Company, LLC and Georgia
Southwestern Railroad, Inc.

Dated: December 6, 2018

Before the
SURFACE TRANSPORTATION BOARD

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SOUTH CAROLINA CENTRAL RAILROAD COMPANY, LLC
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JOINT ENVIRONMENTAL/HISTORIC REPORT

South Carolina Central Railroad Company, LLC (“SCRF” or “Applicant”), as the owner of a perpetual freight operating easement, and Georgia Southwestern Railroad, Inc. (“GSWR”), as the lessee and operator, will be seeking exemption authority for the abandonment and discontinuance of the freight easement for the line of railroad extending between Milepost 72.88 and Milepost 72.63 (a total of 1350 feet) in the Town of Sasser, Terrell County, GA (the “Subject Line”). There are no stations located on the Subject Line. The underlying property is owned by Georgia Department of Transportation (“GaDOT”). The Subject Line traverses through United States Postal Service ZIP Code 39885. A map of the Subject Line is attached as Exhibit A.

SCRF plans to seek Surface Transportation Board (“STB”) authorization for its abandonment through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about December 26, 2018. GSWR plans to seek STB authorization at the same time for its discontinuance of service through a notice of exempt discontinuance pursuant to the provisions of 49 CFR §1152.50. This Report is being filed in connection therewith, and in

accordance with the requirements of 49 CFR 1105.7 and 1105.8.¹ 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.² 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

Applicant originally acquired the line that includes the Subject Line from CSX Transportation, Inc. ("CSXT") in 1989. *South Carolina Central Railroad Company, Inc.—Purchase—CSX Transportation, Inc., Line between Dawson and Albany, Georgia*, ICC Finance Docket No. 31481 (served October 25, 1989).³ Subsequently, in 2002, Applicant sold the line

¹ GSWR is not required to prepare and file an environmental and historic report in connection with its proposed discontinuance of service. See 49 C.F.R. §1105.6(c) and §1105.8(b). See also *Blacklands Railroad, Inc. – Discontinuance Exemption – In Rusk County, Tex.*, STB Docket No. AB 1108X (served April 3, 2013); *CSX Transportation, Inc. – Discontinuance of Service Exemption - In Raleigh County, W. Va.*, STB Docket No. AB 55 (Sub-No. 725X) (served September 11, 2012); *Norfolk Southern Railway Company – Discontinuance of Service Exemption – In St. Joseph and LaPorte Counties, IN*, STB Docket No. AB-290 (Sub-No. 307X) (served June 18, 2008). However, since the discontinuance involves the same Subject Line as SCRF's proposed abandonment, GSWR has joined with SCRF in the consultation with agencies and the preparation of this Report. The Report will focus only on the abandonment, and will treat only SCRF as the "Applicant" for abandonment authority.

² The consultation letters inadvertently misidentified the endpoints of the Subject Line although the enclosed map accurately showed the correct location of the short segment of track involved. Applicant and GSWR do not believe that recipients would have been confused by the erroneous mileposts.

³ Applicant's then-parent RailTex, Inc. subsequently transferred the line, and various other lines that it owned, to GSWR, then a newly formed non-carrier. *RailTex, Inc.-Corporate Family Transaction Exemption-Georgia and Alabama Lines, South Carolina Central Railroad Co., Inc. and Georgia Southwestern Railroad, Inc.*, ICC Finance Docket No. 32682 (served Apr. 20, 1995). Subsequently, Applicant reacquired all of GSWR's rail lines, and leased those rail lines back to GSWR. See *Georgia Southwestern Railroad, Inc.-Sale and Lease Exemption Within a Corporate Family Transaction-South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34144 (served Jan. 18, 2002).

that includes the Subject Line to GaDOT and retained a permanent freight easement and the common carrier obligation with respect to the Subject Line. *State of Georgia, Department of Transportation--Acquisition Exemption-- South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34057 (served April 30, 2002). At the time the line had been leased to Applicant's affiliate GSWR, and GSWR continued to lease and operate the line after the sale of the physical assets to GaDOT. *Id.* The Subject Line has not had any local or overhead service in well over two years.⁴ A portion of the tracks were removed at some unknown time in the past. There are no current plans to salvage the remaining track and track materials. SCRF and GSWR have received an expression of interest from South Georgia Rails To Trails Inc. ("SGRT") regarding possible acquisition of the right of way for rail banking and interim trail use in order to extend its existing trail property and establish a trail head in Sasser, Georgia.⁵

2. EFFECTS OF THE TRANSPORTATION SYSTEM

Because there has been no local or overhead service on the Subject Line for well over two years, no traffic will be diverted, and Applicant believes that the abandonment would have

⁴ Applicant (through its Georgia Great Southern Division) was originally authorized to abandon the adjacent segment of track between Milepost 72.88 and Milepost 86.5 in August 1996. *Georgia Great Southern Division, South Carolina Central Railroad Co., Inc. – Abandonment and Discontinuance Exemption – Between Albany and Dawson, In Terrell, Lee and Dougherty Counties, GA*, STB Docket No. AB 389 (Sub-No. 1X) (served August 1996). Current management of the Applicant does not believe that there has been any service on the Subject Line since that time.

⁵ SGRT previously has acquired for interim trail use and rail banking the adjacent segments of track that were abandoned by GSWR as successor to Applicant. *See* footnote 3, above. Although the original NITU was vacated in 2003 (*Georgia Great Southern Division, South Carolina Central Railroad Co., Inc. – Abandonment and Discontinuance Exemption – Between Albany and Dawson, In Terrell, Lee and Dougherty Counties, GA*, STB Docket No. AB 389 (Sub-No. 1X) (served May 16, 2003)), in May 2006, SGRT filed for a new NITU with respect to the portion of the line between Milepost 77.8 and Milepost 86.5. SGRT closed on the acquisition of that portion of the line for interim trail use in 2007. Thereafter, in May 2014, SGRT filed for a new NITU for the remaining segment adjacent to the Subject Line between Milepost 72.88 and Milepost 77.80. SGRT closed on the acquisition of this additional portion of the line for interim trail use in 2015.

no effect on the transportation system. Applicant sent a consultation letter regarding the proposed abandonment to GaDOT. *See* the letters attached as part of Exhibit B.⁶ No response has been received from GaDOT.

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: Georgia Department of Natural Resources (“GaDNR”), Terrell County Board of Commissioners (“Terrell County”), the Town of Sasser (“Sasser”), U.S. Environmental Protection Agency (Region 4) (“EPA”), U.S. National Park Service (national), U.S. National Park Service (Southeast Region), U.S. Department of Agriculture, NRCS (national) (“NRCS-national”), U.S. Department of Agriculture, NRCS (Georgia State Conservationist) (“NRCS-Georgia”), U.S. Army Corps of Engineers (South Atlantic Division), and the NOAA, National Geodetic Survey (“NGS”). Copies of these letters are attached as part of Exhibit B. To date, Applicant has only received responses from the following consulted agencies, copies of which are included as part of Exhibit C:

- EPA indicated that it does not believe that the proposed activities represent a significant environmental impact, and had no technical recommendations.
- NGS indicated that there may be one survey mark in the area of the Subject Line, and requested consultation prior to the commencement of salvage activities.
- Sasser indicated that it does not have any concerns relative to the proposed abandonment and discontinuance.

⁶ SCRF and GSWR have also independently advised GaDOT as owner of assets comprising the Subject Line of their intention to abandon and discontinue service over the Subject Line.

(ii) Applicant does not believe that the proposed abandonment will have any adverse effect on any prime agricultural land as the Subject Line is within the city limits of Sasser. Consultation notices were sent to the agencies listed in paragraph 3(i) above, and as indicated, no responses have been received except for the responses from EPA, NGS and Sasser, none of which have any issues with the proposed abandonment.

(iii) Applicant does not believe that the abandonment is inconsistent with any coastal zone plans. Applicant sent a consultation letter regarding the abandonment to the Georgia Department of Natural Resources, Coastal Resources Division, a copy of which is attached as part of Exhibit B. No response has been received.

(iv) As described above, Applicant believes that the right of way is suitable for use as a trail or other public purposes. SGRT has expressed an interest in acquiring the Subject Line for interim trail use and rail banking, including development as a rail head and as an extension for property it has previously acquired for rail banking. SGRT is working with GaDNR, and the Georgia Recreational Trails Grant Program on the trail extension project.

4. ENERGY

Since there has not been any local or overhead service on the Subject Line for well more than two years,

- (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) there 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

Since there has not been any local or overhead service on the Subject Line for well more than two years, 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)(4)(v).

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 U.S. Fish and Wildlife Service (Southeast Region), as well as to the following agencies that are potentially concerned with biological resources: GaDNR, EPA, U.S. National Park Service (national and Southeast Region), U.S. Army Corps of Engineers, NRCS-national, and NRCS-Georgia. Copies of these consultation letters are attached as part of Exhibit B. The only potentially relevant response received to-date was from EPA, a copy of which is attached as part of Exhibit C. The following is a summary of the response:

- EPA indicated that it does not believe that the proposed activities represent a significant environmental impact, and had no technical recommendations.

(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 received only the responses summarized above.

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 received only the responses set forth in paragraph 8(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. No response has been received to-date.

(iii) Applicant does not believe that any Clean Water Act permits will be required. Consultation letters were sent to GaDNR and EPA. Copies of these letters are attached as part of Exhibit B. As noted above, EPA in its response indicated that it had no comments or concerns. *See* the response included as part of Exhibit C. No response has been received from GaDNR.

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: GaDOT, GaDNR, GaDNR Coastal Resources Division, EPA, U.S. Fish and Wildlife Service (Southeast Region 4), National Park Service (Southeast Region), National Park Service (national), NCRS-national, NCRS-Georgia, NGS, and U.S. Army Corps of Engineers (South Atlantic Division), Terrell County and Sasser. Written responses received to-date are attached as Exhibit C.

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 Dawson News* on October 18, 2018. A copy of the form of notice and the proof of publication are attached as Exhibit D.
- (d) Applicant will not file its verified notice of abandonment until at least twenty (20) days after the 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. There are no known bridges or other structures on the Subject Line.

2. DESCRIPTION OF RIGHT OF WAY

The Subject Line extends between Milepost 72.88 and Milepost 72.63 (a total of 1350 feet) in the Town of Sasser, Terrell County, Georgia. The Subject Line is located within the city limits and the area has a number of retail buildings, some grain storage bins and barns along with a church and a few single family homes.

3. PHOTOGRAPHS OF HISTORIC STRUCTURE(S)

As noted above, there are no structures (historic or otherwise) located on the Subject Line, and accordingly, no photographs are required. Attached as Exhibit F are some photographs that provide a general depiction of the right of way of the Subject Line.

4. DATES OF CONSTRUCTION OF HISTORIC STRUCTURE(S)

As noted above, there are no structures (historic or otherwise) located on the Subject Line.

5. HISTORY OF CARRIER OPERATIONS IN THE AREA

Applicant does not know the full history of the Subject Line, although it does believe that the Subject Line was originally constructed more than 50 years ago. At some point in time, CSXT became the successor owner of the line that includes the Subject Line. Applicant originally acquired the line that includes the Subject Line from CSXT in 1989. *South Carolina Central Railroad Company, Inc.—Purchase—CSX Transportation, Inc., Line between Dawson*

and Albany, Georgia, ICC Finance Docket No. 31481 (served October 25, 1989).⁷

Subsequently, in 2002, Applicant sold the line that includes the Subject Line to GaDOT and retained a permanent freight easement and the common carrier obligation with respect to the Subject Line. *State of Georgia, Department of Transportation--Acquisition Exemption-- South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34057 (served April 30, 2002). At the time the line had been leased to Applicant's affiliate GSWR, and GSWR continued to lease and operate the line after the sale of the physical assets to GaDOT. *Id.*

Applicant (through its Georgia Great Southern Division) was originally authorized to abandon the adjacent segment of track between Milepost 72.88 in Sasser, Georgia, and Milepost 86.5 in Albany, Georgia, in August 1996. *Georgia Great Southern Division, South Carolina Central Railroad Co., Inc. – Abandonment and Discontinuance Exemption – Between Albany and Dawson, In Terrell, Lee and Dougherty Counties, GA*, STB Docket No. AB 389 (Sub-No. 1X) (served August 1996). The original NITU was vacated in 2003. *Id.* (served May 16, 2003). However, in May 2006, SGRT filed for a new NITU with respect to the portion of the line between Milepost 77.8 and Milepost 86.5. SGRT closed on the acquisition of that portion of the line for interim trail use in 2007. Then in May 2014, SGRT filed for a new NITU for the remaining segment adjacent to the Subject Line between Milepost 72.88 and Milepost 77.80. SGRT closed on the acquisition of this additional portion of the line for interim trail use in 2015.

⁷ Applicant's then-parent RailTex, Inc. subsequently transferred the line, and various other lines that it owned, to GSWR, then a newly formed non-carrier. *RailTex, Inc.-Corporate Family Transaction Exemption-Georgia and Alabama Lines, South Carolina Central Railroad Co., Inc. and Georgia Southwestern Railroad, Inc.*, ICC Finance Docket No. 32682 (served Apr. 20, 1995). Subsequently, Applicant reacquired all of GSWR's rail lines, and leased those rail lines back to GSWR. *See Georgia Southwestern Railroad, Inc.-Sale and Lease Exemption Within a Corporate Family Transaction-South Carolina Central Railroad, Inc.*, STB Finance Docket No. 34144 (served Jan. 18, 2002).

Over the years, various components of the Subject Line, including track, ties, crossings and signals, would have been repaired or replaced as part of routine maintenance. Some of the track was removed at some time in the past although current management of the Applicant does not have records that indicate when such removal may have taken place.

6. SUMMARY OF STRUCTURE DOCUMENTATION

Not applicable. As noted above, there are no structures (historic or otherwise) located on the Subject Line.

7. OPINION REGARDING CRITERIA FOR LISTING

Applicant has given notice of the proposed abandonment to the State Historic Preservation Officer at the Georgia Department of Natural Resources, Historic Preservation Division ("SHPO"), a copy of which is included as part of Exhibit B. In its letter response, a copy of which is included in Exhibit C, Applicant was advised that the SHPO considers almost all railroads in Georgia as eligible for listing in the National Register of Historic Places, and that abandonment constitutes an adverse effect. Accordingly, the SHPO indicates that it should be consulted by the federal agency (presumably the Board through the Section on Environmental Analysis ("SEA")) on ways to avoid or reduce the adverse effects. While Applicant does not necessarily agree that this 1350 foot segment containing no structures has any independent historic importance, it understands that SGRT as the proposed trail sponsor would be willing to consult further with SEA and the SHPO regarding ways to avoid or reduce any adverse effects of the proposed abandonment.

Although no salvage work is currently planned, Applicant believes that any future salvage work that would occur would take place within the right of way, and would be surface work only and would not disturb subsurface resources.

8. **ENVIRONMENTAL CONDITIONS**

Applicant is unaware of any prior subsurface ground disturbance or fill, or environmental conditions which might affect the archeological recovery of resources or the surrounding terrain.

Respectfully submitted,



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(215) 640-8500
ehocky@clarkhill.com

Attorneys for South Carolina Central
Railroad Company, LLC, and Georgia
Southwestern Railroad, Inc.

Dated: December 6, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 2018, I served a copy of the foregoing Environmental/Historic Report on the persons listed below by first class mail, postage prepaid:

Georgia Department of Transportation
Attn: Carol Comer, Director – Intermodal
Division
600 West Peachtree Street N.W.
2nd Floor
Atlanta, GA 30308

National Park Service,
Southeast Region
100 Alabama Street, SW
1924 Building
Atlanta, GA 30303

Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive
SE Suite 1252 East Tower
Atlanta, GA 30334

National Park Service
1849 C Street, NW
Washington, DC 20240

Wilbur T. Gamble, III, Chairman
Terrell County Board of Commissioners
955 Forrester Drive, S.E.
Dawson, GA 39842

Natural Resources Conservation Service
USDA
Office of the Chief
1400 Independence Ave., SW
Room 5105-A
Washington, DC 20250

U.S. Environmental Protection Agency
Region 4
61 Forsyth Street SW
Atlanta, GA 30303

Natural Resources Conservation Service
USDA
Georgia State Conservationist
355 E. Hancock Ave., Mail Stop 200
Athens, GA 30601

U.S. Fish and Wildlife Service
Southeast Region 4
Office of the Regional Director
1875 Century Boulevard
Atlanta, GA 30345-3319

Communications and Outreach Branch
NOAA, N/NGS12
National Geodetic Survey, SSMC3 #9340
1315 East-West Highway
Silver Spring, MD 20910-3282

U.S. Army Corps of Engineers
South Atlantic Division
60 Forsyth St. SW
Atlanta, GA 30303-8801

Mayor Jan Jones
Town of Sasser
118 East Main Street
Sasser, GA 39885

State Historic Preservation Officer
Georgia Historic Preservation Division
Department of Natural Resources
Jewett Center for Historic Preservation
2610 GA Hwy 155, SW
Stockbridge, GA 30281

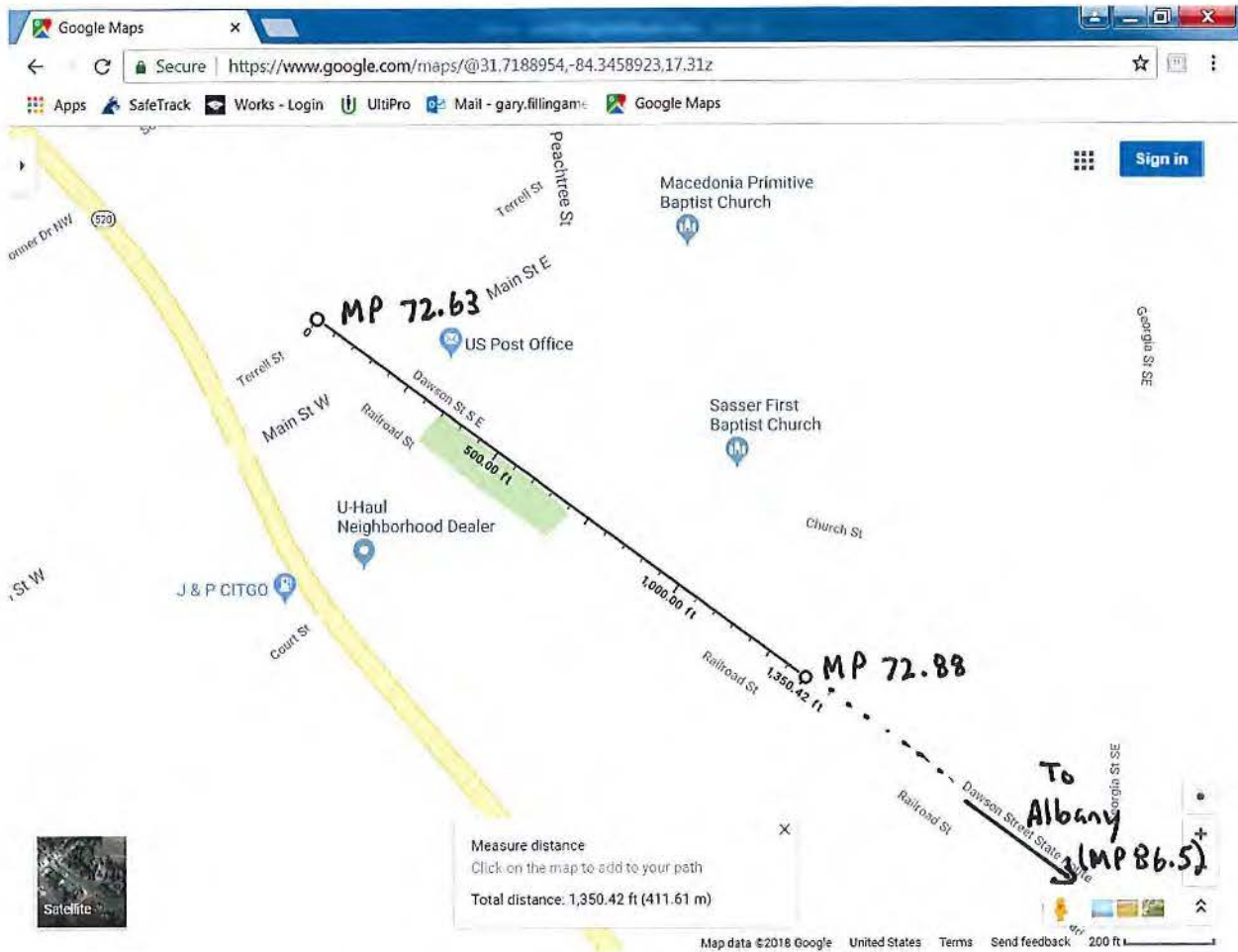
Georgia Department of Natural Resources,
Coastal Resources Division
One Conservation Way Suite # 300
Brunswick, GA 31520-8687



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Philadelphia, PA 19103-7041
(215) 640-8500
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EXHIBIT A

MAP



[CORRECTED]

EXHIBIT B

CONSULTATION LETTERS

CLARK HILL

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September 21, 2018

ALL AGENCIES SHOWN ON THE ATTACHED SERVICE LIST

Re: South Carolina Central Railroad Company, LLC - Abandonment Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 312 (Sub-No. 4X)

Georgia Southwestern Railroad, Inc. - Discontinuance Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X)

To Whom it May Concern:

This letter is to advise you that South Carolina Central Railroad Company, LLC ("SCRF"), as owner of a perpetual freight operating easement, and Georgia Southwestern Railroad, Inc. ("GSWR"), as lessee and operator, intend to file, respectively, for the abandonment and discontinuance of a freight easement for the line of railroad extending Milepost 72.88 and Milepost 73.13 (a total of 1350 feet) in the Town of Sasser, Terrell County, GA (the "Subject Line"). The underlying property is owned by Georgia Department of Transportation. The Subject Line traverses through United States Postal Service ZIP Code 39885. A map of the Subject Line is attached as Exhibit A.

SCRF plans to seek Surface Transportation Board ("STB") authorization for its abandonment through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 312 (Sub-No. 4X). GSWR plans to seek STB authorization for its discontinuance through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X).

ALL AGENCIES SHOWN ON THE ATTACHED SERVICE
LIST

September 21, 2018

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Based upon information in the possession of SCRF and GSWR, the Subject Line does not contain federally granted rights of way. Any documentation in their possession will be made available promptly to those requesting it. SCRF and GSWR have received an expression of interest from South Georgia Rails To Trails Inc. regarding possible acquisition of the right of way for rail banking and interim trail use. SCRF and GSWR believe that this is a reasonable alternative public purpose for the right of way.

No local service has been provided on the Subject Line for well more than two years. SCRF and GSWR do not believe that there are any alternatives to the proposed action. At this time, SCRF and GSWR intend to remove and sell or reuse the track on the Subject Line. SCRF and GSWR believe that the abandonment will not have a significant effect upon the environment.

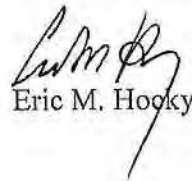
In advance of preparing an environmental report as required by applicable STB regulations, we are consulting with appropriate agencies such as yours as to any concerns which they may have as to environmental effects of the proposed abandonment.

We would appreciate an expression from you by October 22, 2018 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 (215) 640-8523.

Thank you for your cooperation.

Sincerely,

CLARK HILL PLC



Eric M. Hooky

EMH/dml
Enclosure

AGENCY SERVICE LIST

Georgia Department of Transportation
Attn: Carol Comer, Director – Intermodal
Division
600 West Peachtree Street N.W.
2nd Floor
Atlanta, GA 30308

National Park Service,
Southeast Region
100 Alabama Street, SW
1924 Building
Atlanta, GA 30303

Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive
SE Suite 1252 East Tower
Atlanta, GA 30334

National Park Service
1849 C Street, NW
Washington, DC 20240

Wilbur T. Gamble, III, Chairman
Terrell County Board of Commissioners
955 Forrester Drive, S.E.
Dawson, GA 39842

Natural Resources Conservation Service
USDA
Office of the Chief
1400 Independence Ave., SW
Room 5105-A
Washington, DC 20250

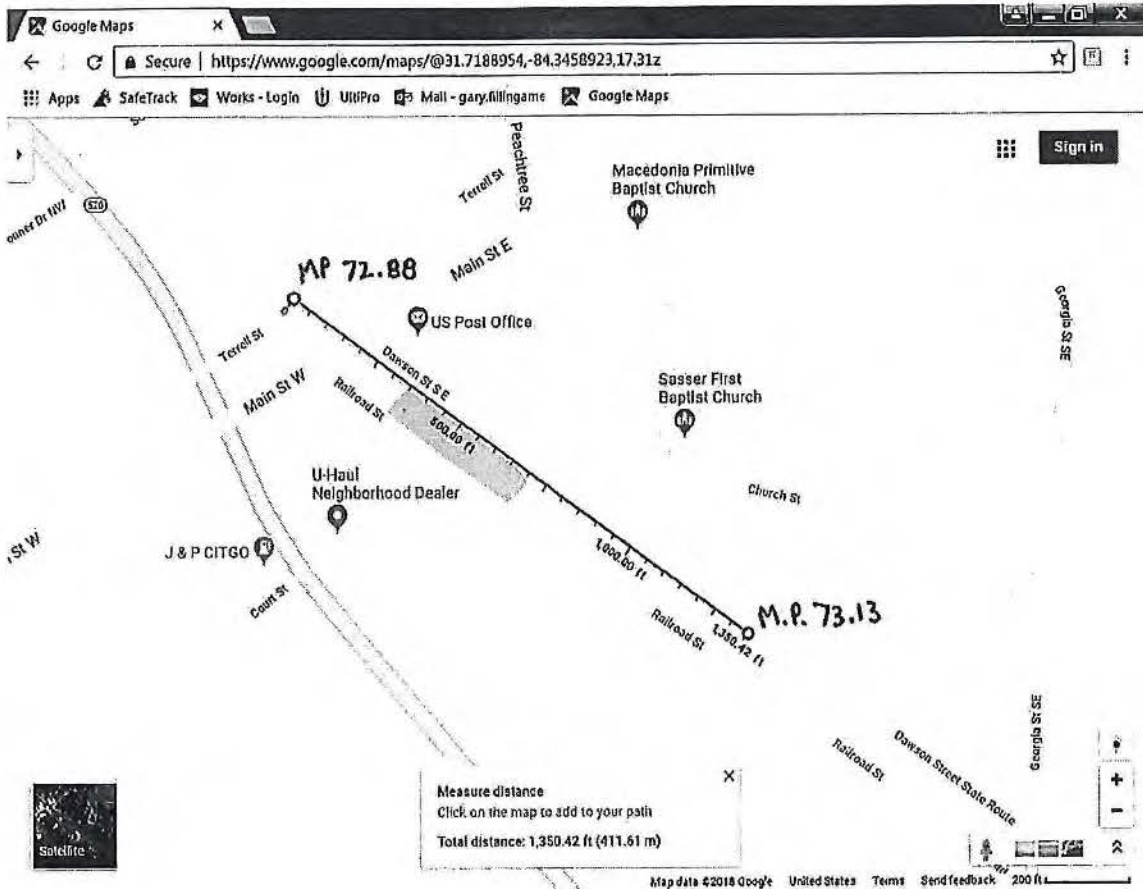
U.S. Environmental Protection Agency
Region 4
61 Forsyth Street SW
Atlanta, GA 30303

Natural Resources Conservation Service
USDA
Georgia State Conservationist
355 E. Hancock Ave., Mail Stop 200
Athens, GA 30601

U.S. Fish and Wildlife Service
Southeast Region 4
Office of the Regional Director
1875 Century Boulevard
Atlanta, GA 30345-3319

Communications and Outreach Branch
NOAA, N/NGS12
National Geodetic Survey, SSMC3 #9340
1315 East-West Highway
Silver Spring, MD 20910-3282

U.S. Army Corps of Engineers
South Atlantic Division
60 Forsyth St. SW
Atlanta, GA 30303-8801



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September 21, 2018

Georgia Department of Natural Resources,
Coastal Resources Division
One Conservation Way Suite # 300
Brunswick, GA 31520-8687

Re: South Carolina Central Railroad Company, LLC - Abandonment Exemption -
In Terrell County, GA
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Georgia Southwestern Railroad, Inc. - Discontinuance Exemption -
In Terrell County, GA
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To Whom it May Concern:

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Georgia Department of Natural Resources, Coastal Resources
Division

September 21, 2018
Page 2

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No local service has been provided on the Subject Line for well more than two years. SCRF and GSWR do not believe that there are any alternatives to the proposed action. At this time, SCRF and GSWR intend to remove and sell or reuse the track on the Subject Line. SCRF and GSWR believe that the abandonment will not have a significant effect upon the environment.

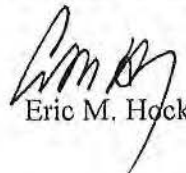
In advance of preparing an environmental report as required by applicable STB regulations, we are consulting with appropriate agencies such as yours as to any concerns which they may have as to environmental effects of the proposed abandonment.

Please advise us whether the Subject Line is within Pennsylvania's coastal zone. If it is within the coastal zone, please advise further (1) if the proposed abandonment is an action listed for review in Florida's coastal zone management plan, and (2) if the action is so listed, whether the proposed action is consistent with the coastal zone management plan. We would appreciate a response from you by October 22, 2018. If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (215) 640-8523.

Thank you for your cooperation.

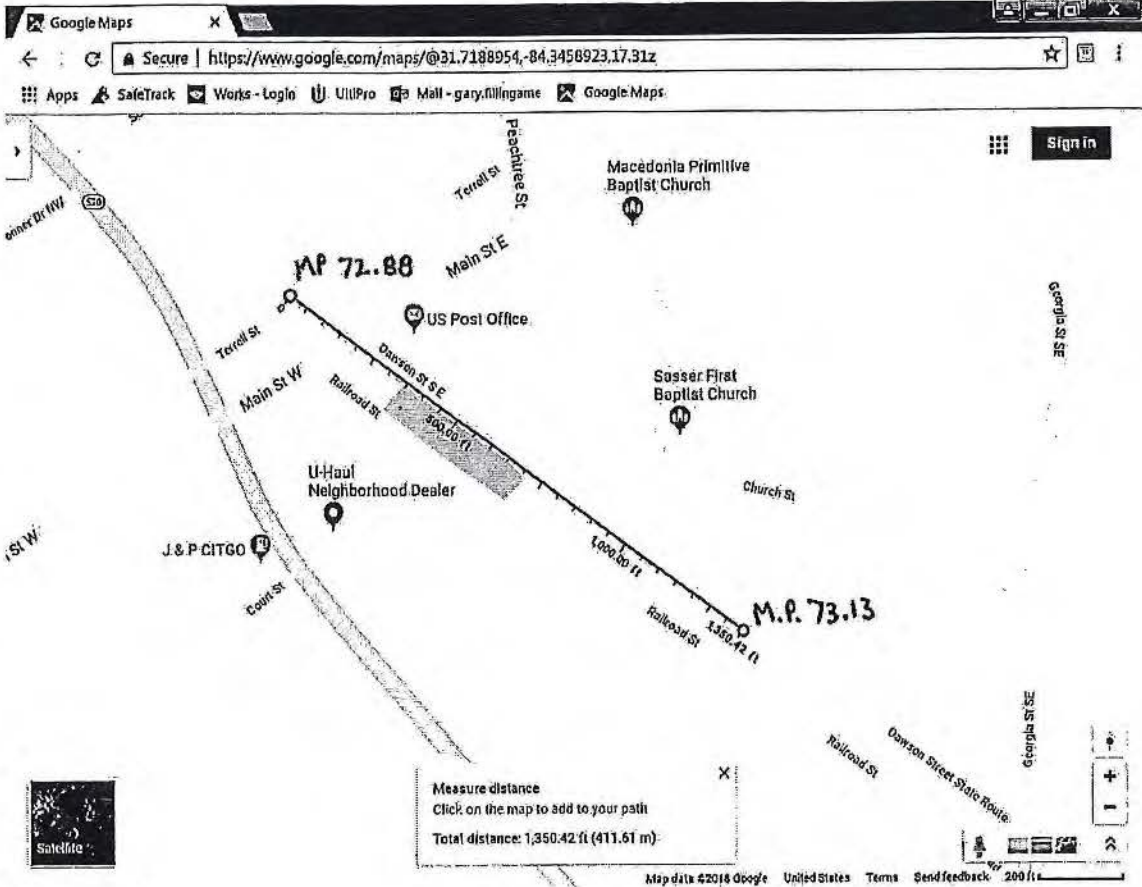
Sincerely,

CLARK HILL PLC



Eric M. Hocky

EMH/dml
Enclosure



CLARK HILL

Eric M. Hocky
T 215.640.8523
F 215.640.8501
Email: ehocky@clarkhill.com

Clark Hill PLC
One Commerce Square
2005 Market Street
Suite 1000
Philadelphia, PA 19103
T 215.640.8500
F 215.640.8501
clarkhill.com

October 3, 2018

VIA E-MAIL (SASSER39885@WINDSTREAM.NET)

Mayor Jan Jones
Town of Sasser
118 East Main Street
Sasser, GA 39885

Re: South Carolina Central Railroad Company, LLC - Abandonment Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 312 (Sub-No. 4X)

Georgia Southwestern Railroad, Inc. - Discontinuance Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X)

Dear Mayor Jones:

This letter is to advise you that South Carolina Central Railroad Company, LLC ("SCRF"), as owner of a perpetual freight operating easement, and Georgia Southwestern Railroad, Inc. ("GSWR"), as lessee and operator, intend to file, respectively, for the abandonment and discontinuance of a freight easement for the line of railroad extending Milepost 72.88 and Milepost 73.13 (a total of 1350 feet) in the Town of Sasser, Terrell County, GA (the "Subject Line"). The underlying property is owned by Georgia Department of Transportation. The Subject Line traverses through United States Postal Service ZIP Code 39885. A map of the Subject Line is attached as Exhibit A.

SCRF plans to seek Surface Transportation Board ("STB") authorization for its abandonment through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 312 (Sub-No. 4X). GSWR plans to seek STB authorization for its discontinuance through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X).

Mayor Jan Jones
October 3, 2018
Page 2

Based upon information in the possession of SCRF and GSWR, the Subject Line does not contain federally granted rights of way. Any documentation in their possession will be made available promptly to those requesting it. SCRF and GSWR have received an expression of interest from South Georgia Rails To Trails Inc. regarding possible acquisition of the right of way for rail banking and interim trail use. SCRF and GSWR believe that this is a reasonable alternative public purpose for the right of way.

No local service has been provided on the Subject Line for well more than two years. SCRF and GSWR do not believe that there are any alternatives to the proposed action. At this time, SCRF and GSWR intend to remove and sell or reuse the track on the Subject Line. SCRF and GSWR believe that the abandonment will not have a significant effect upon the environment.

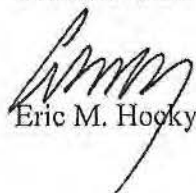
In advance of preparing an environmental report as required by applicable STB regulations, we are consulting with appropriate agencies such as yours as to any concerns which they may have as to environmental effects of the proposed abandonment.

We would appreciate an expression from you by October 22, 2018, or as soon thereafter as is possible, 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 (215) 640-8523.

Thank you for your cooperation.

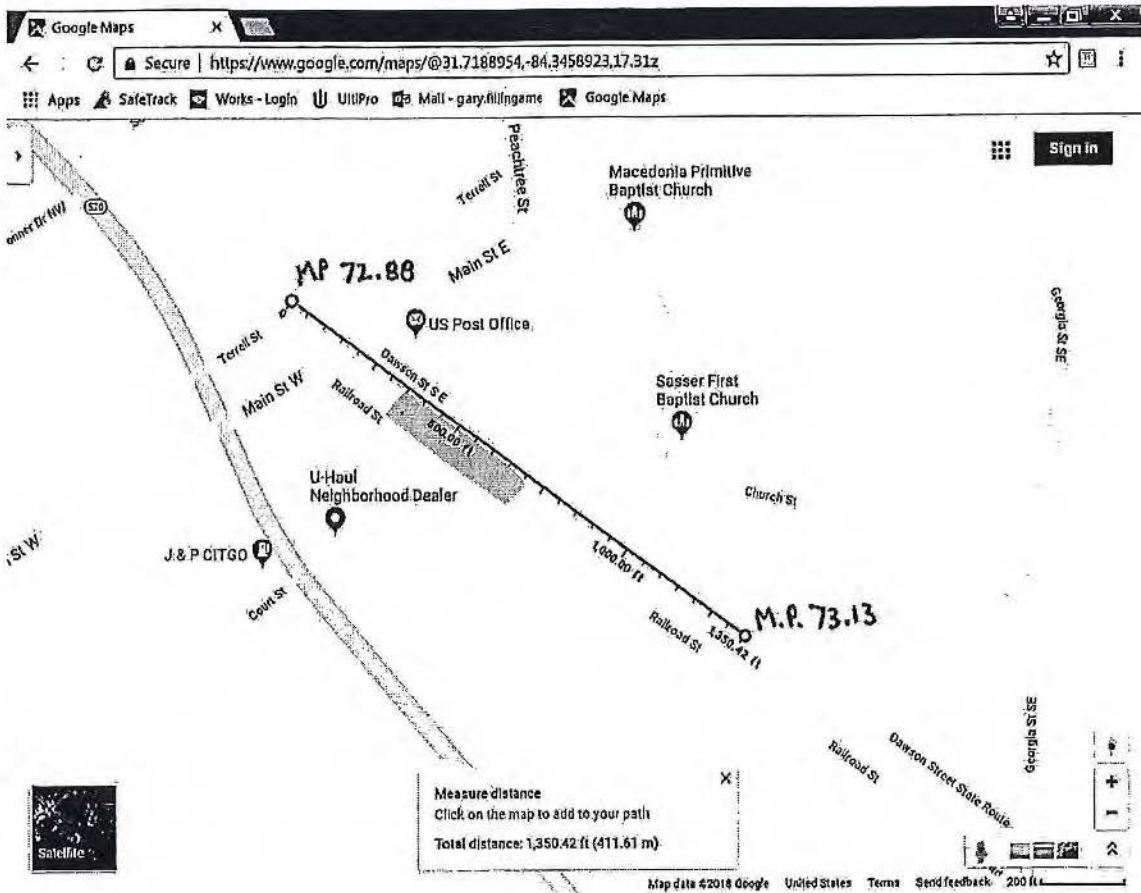
Sincerely,

CLARK HILL PLC



Eric M. Hooky

EMH/dml
Enclosure



CLARK HILL

Eric M. Hocky
T 215.640.8523
F 215.640.8501
Email: ehocky@clarkhill.com

Clark Hill PLC
One Commerce Square
2005 Market Street
Suite 1000
Philadelphia, PA 19103
T 215.640.8500
F 215.640.8501
clarkhill.com

October 3, 2018

State Historic Preservation Officer
Georgia Historic Preservation Division
Department of Natural Resources
Jewett Center for Historic Preservation
2610 GA Hwy 155, SW
Stockbridge, GA 30281

Re: South Carolina Central Railroad Company, LLC - Abandonment Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 312 (Sub-No. 4X)

Georgia Southwestern Railroad, Inc. - Discontinuance Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X)

To Whom it May Concern:

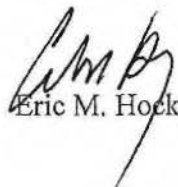
Enclosed please find a letter that we attempted to send to you on September 21st to consult with you about the above referenced Surface Transportation Board proceedings. Unfortunately, we did not have the proper current address for you.

State Historic Preservation Officer
October 3, 2018
Page 2

We apologize for any inconvenience due to the delay in providing you with the enclosed letter.

Sincerely,

CLARK HILL PLC


Eric M. Hocky

EMH/dml
Enclosure

CLARK HILL

Eric M. Hocky
T 215.640.8523
F 215.640.8501
Email: ehocky@clarkhill.com

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2005 Market Street
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Philadelphia, PA 19103
T 215.640.8500
F 215.640.8501
clarkhill.com

September 21, 2018

State Historic Preservation Officer
Georgia Historic Preservation Division
Department of Natural Resources
34 Peachtree Street, Suite 1600
Atlanta, GA 30303-2316

Re: South Carolina Central Railroad Company, LLC - Abandonment Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 312 (Sub-No. 4X)

Georgia Southwestern Railroad, Inc. - Discontinuance Exemption -
In Terrell County, GA
Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X)

To Whom it May Concern:

This letter is to advise you that South Carolina Central Railroad Company, LLC ("SCRF"), as owner of a perpetual freight operating easement, and Georgia Southwestern Railroad, Inc. ("GSWR"), as lessee and operator, intend to file, respectively, for the abandonment and discontinuance of a freight easement for the line of railroad extending Milepost 72.88 and Milepost 73.13 (a total of 1350 feet) in the Town of Sasser, Terrell County, GA (the "Subject Line"). The underlying property is owned by Georgia Department of Transportation. The Subject Line traverses through United States Postal Service ZIP Code 39885. A map of the Subject Line is attached as Exhibit A.

SCRF plans to seek Surface Transportation Board ("STB") authorization for its abandonment through a notice of exempt abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 312 (Sub-No. 4X). GSWR plans to seek STB authorization for its discontinuance through a notice of exempt

State Historic Preservation Officer
September 21, 2018
Page 2

abandonment pursuant to the provisions of 49 CFR §1152.50 on or about November 1, 2018 in Surface Transportation Board Docket No. AB 1000 (Sub-No. 4X)

Based upon information in the possession of SCRF and GSWR, the Subject Line does not contain federally granted rights of way. Any documentation in their possession will be made available promptly to those requesting it. SCRF and GSWR have received an expression of interest from South Georgia Rails To Trails Inc. regarding possible acquisition of the right of way for rail banking and interim trail use. SCRF and GSWR believe that this is a reasonable alternative public purpose for the right of way.

No local service has been provided on the Subject Line for well more than two years. SCRF and GSWR do not believe that there are any alternatives to the proposed action. At this time, SCRF and GSWR intend to remove and sell or reuse the track on the Subject Line. SCRF and GSWR believe that the abandonment will not have a significant effect upon the environment.

There are no structures, 50 years old or older or otherwise, located on the Subject Line.

In advance of preparing an historic 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 environmental or historic effects of the proposed abandonment.

We would appreciate an expression from you by October 22, 2018 that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon historic preservation (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 (215) 640-8523.

Thank you for your cooperation.

Sincerely,

CLARK HILL PLC


Eric M. Hocky

EMH/dml
Enclosure

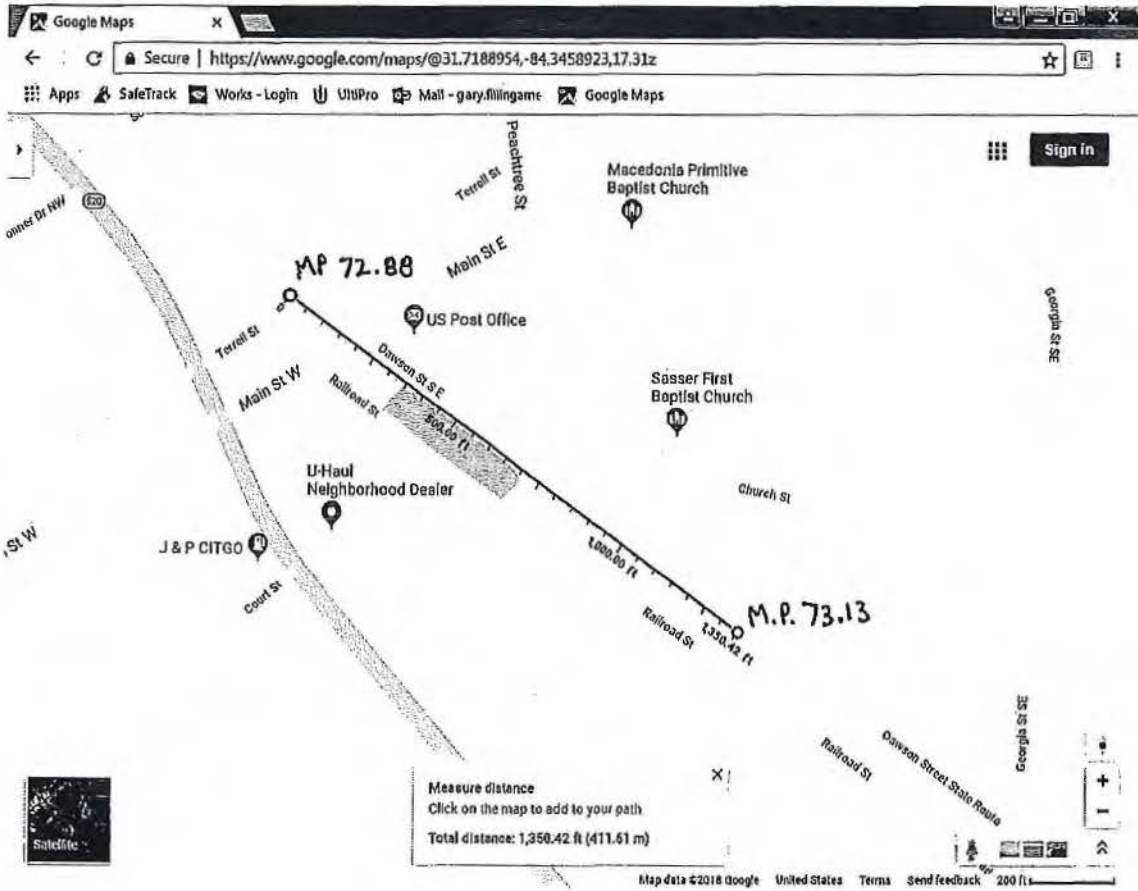


EXHIBIT C

AGENCY RESPONSES

Hocky, Eric M.

From: Militscher, Chris <Militscher.Chris@epa.gov>
Sent: Thursday, September 27, 2018 11:22 AM
To: Hocky, Eric M.
Subject: 9/21/18 Notice regarding SCCRC & GSR Exemptions

Mr. Hocky: The EPA Region 4 NEPA Program office has reviewed the above referenced notice regarding the abandonment exemption in Terrell Co., GA and the discontinuance exemption in Terrell Co., GA, for the respective railroad companies. We do not believe the proposed activities represent a significant environmental impact and do not have any technical recommendations under the National Environmental Policy Act (NEPA) to offer. Thank you.

Sincerely,

Christopher A. Militscher
Chief, NEPA Program Office
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
Militscher.chris@epa.gov
404-562-9512

Hocky, Eric M.

From: Deborah Brooks - NOAA Federal <Deborah.Brooks@noaa.gov>
Sent: Thursday, September 27, 2018 5:39 PM
To: Hocky, Eric M.
Cc: Surface Transportation Board; Christine Gallagher - NOAA Federal
Subject: NGS RESPONSE, STB Docket No. AB 312 (Sub-No. 4X) and AB 1000 (Sub-No.4X)

Thank you for sharing your proposed railroad abandonment and discontinuance of the freight easement (1350 feet) in

Sasser, Terrell County, Georgia, 39885.

There is 1 geodetic survey mark located in the area described. This mark may or may not be disturbed.

If this mark will be disturbed by the abandonment, [THE RAILROAD] shall consult with the National Geodetic Survey (NGS) at least 90 days prior to beginning salvage activities that will disturb, or destroy any geodetic station marks below.

Dist	PID...	Set.	Set_By	H	V	Vert_Source	Latitude.....	Longitude.....	Stab	C	Designation
....	BT0178	1935	GAGS...	1	88	ADJUSTED	N314311.37...	W0842050.91...	C...	N	11 H 9

Additional advice is provided at <http://geodesy.noaa.gov/marks/railroads/>

Town of Sasser
118 East Main St.
Phone: 229-698-6614
Fax: 229-698-0018
Email: sasser39885@windstream.net

October 3, 2018

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Eric M. Hocky, Attorney at Law
Clark Hill PLC
One Commerce Square

2005 Market Street, Suite 1000

Philadelphia, PA 19103

Dear Attorney Hocky:

In response to your October 3, 2018 inquiry to the Town of Sasser regarding abandonment and discontinuance petitions of a freight easement extending from Milepost 72.88 to Milepost 73.13 (a total of 1350 feet) in the Town of Sasser, please be advised that the Town of Sasser does not perceive that the abandonment and discontinuance will have a significant effect upon the environment in our municipality. In addition, the Town of Sasser does not have any concerns relative to the issue nor do we have any questions that need to be answered.

Should you need any further information, please contact us.

Sincerely,

Jan Jones, Mayor
Town of Sasser

Hocky, Eric M.

From: HPD106-DoNotReply <hpd106-DoNotReply@dnr.ga.gov>
Sent: Monday, October 22, 2018 9:01 AM
To: Hocky, Eric M.
Cc: Steve O'Neil
Subject: Abandon/Discontinue Railroad, MP 72.88 to MP 73.13, AB 312/AB 1000, Sasser, Terrell Co, HP 181009-012
Attachments: Terrell HP 181009-012 Oct 22 2018.pdf

From: Historic Preservation Division

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

Do not respond to this e-mail.

If you have any questions concerning our letter, please contact:
Jennifer Dixon at jennifer.dixon@dnr.ga.gov

A free copy of Adobe Acrobat Reader can be downloaded from: www.adobe.com



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

October 22, 2018

Eric M. Hocky
Clark Hill PLC
One Commerce Square
2005 Market Street, Suite 1000
Philadelphia, Pennsylvania 19103

**RE: Abandon/Discontinue Railroad, MP 72.88 to MP 73.13, AB 312/AB 1000, Sasser
Terrell County, Georgia
HP-181009-012**

Dear Mr. Hocky:

The Historic Preservation Division (HPD) has reviewed 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 abandoning approximately .25 mile of rail line from milepost 72.88 to milepost 73.13 in Sasser to potentially be utilized as a trail. HPD would like to note that based on the forthcoming railroad context entitled, *Georgia's Railroads, 1833-2015: Historic Context and Statewide Survey*, most railroads in the State of Georgia are eligible for listing in the National Register of Historic Places (NRHP), under Criteria A and C for transportation and engineering. As such, HPD finds that the Georgia & Alabama Air Line, a component of the Seaboard Air Line railroad, is eligible for listing in the NRHP. Additionally, abandonment of a rail line, which places the resource out of federal oversight, is, by definition, an adverse effect. Therefore, HPD finds that the proposed project constitutes an **adverse effect** to historic properties that are listed in or eligible for listing in the NRHP, as defined in 36 CFR Part 800.5(a)(2).

When an adverse effect to a historic property is found, the federal agency must notify the Advisory Council on Historic Preservation and consult with the State Historic Preservation Officer on ways to avoid or reduce adverse effects to historic properties. HPD would like to make it clear that this determination of an adverse effect is not the end of the consultation process. HPD should be given the opportunity to review and comment on alternate approaches, as they become available, prior to proceeding with the work, as part of a selection process to choose an appropriate plan that will conform to a more favorable effects assessment. We would like to work with STB and its applicants in finding ways to avoid, minimize or mitigate this adverse effect. We look forward to discussing these options with you and working with you as this project progresses.

Please refer to project number **HP-181009-012** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact Jennifer Dixon, Environmental Review Program Manager, at jennifer.dixon@dnr.ga.gov or (770) 389-7851.

V/r,

Dr. David Crass
Division Director
Deputy State Historic Preservation Officer

DCC/jad

Cc: Steve O'Neil, Southwest Georgia Regional Commission

JEWETT CENTER FOR HISTORIC PRESERVATION
2610 GA HWY 155, SW | STOCKBRIDGE, GA 30281
770.389.7844 | FAX 770.389.7878 | WWW.GEORGIAHPO.ORG

EXHIBIT D

NEWSPAPER NOTICE

STB Docket No. AB 312 (Sub-No. 4X)

STB Docket No. AB 1000 (Sub-No. 4X)

Notice of Intent To Abandon

South Carolina Central Railroad Company, LLC (SCRF), as owner of a perpetual freight operating easement, and Georgia Southwestern Railroad, Inc. (GSWR), as lessee and operator, give notice that on or about November 5, 2018, they intend to file jointly with the Surface Transportation Board (Board), Washington, DC 20423, a notice of exemption under 49 CFR 1152 Subpart F – Exempt Abandonments, permitting the abandonment and discontinuance, respectively, of the segment of the line of railroad extending Milepost 72.88 and Milepost 73.13 (a total of 1350 feet) in the Town of Sasser, Terrell County, GA (Subject Line) that traverses through United States Postal Service ZIP Code 39885. The underlying property is owned by Georgia Department of Transportation. The proceedings will be docketed as No. AB 312 (Sub-No. 4X) for SCRF and AB 1000 (Sub-No. 4X) for GSWR.

The Board's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA), which will normally be available 25 days after the filing of the notice of exemption. Comments on environmental and energy matters should be filed no later than 15 days after the EA becomes available to the public, and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to the Office of Environmental Analysis, Surface Transportation Board, 395 E Street, S.W., Washington, DC 20423-0001 or by calling that office at (202) 245-0291.

Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board's Office of Proceedings, Surface Transportation Board, 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 LVRM's representative [see 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance, public use or trails use may be directed to the Board'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: Eric M. Hocky, Esq., Clark Hill PLC, One Commerce Square, 2005 Market Street, Suite 1000, Philadelphia, PA 19103; (215) 640-8500.

The Dawson News

P.O. Box 350

Dawson, GA 39842-0350

Phone – 229-995-2175

Fax – 229-995-2176

news@thedawsonnews.com

October 18, 2018

To Whom It May Concern:

Personally appeared before me, the undersigned, Tommy Rountree, who deposes and says that he is the Publisher of The Dawson News, a newspaper of general circulation published at Dawson, Terrell County, Georgia, and that a legal advertisement for

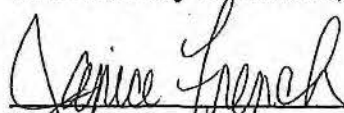
**_____ South Carolina Central Railroad Company LLC
and Georgia Southwestern Railroad Inc. /
Abandonments 39885 _____**

appeared in said newspaper on the following dates

_____ October 18, 2018 _____


**_____
Publisher, The Dawson News**

**Sworn to and subscribed before me
This 18th day of October, 2018.**


**_____
Notary – Stewart County, Georgia**

**Expiration:
August 5, 2019**

Clark Hill PLC

EXHIBIT E

TOPOGRAPHICAL MAPS





Do you find TopoQuest useful?

Help keep TopoQuest running and adding new maps/features by donating!

Bitcoin:

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Litecoin:

LXs6TkuXGGXoIvDsWckWVdjQX94eUKd6ui

Donate \$5.00 USD ▼



[Home](#) [View Maps](#) [Find Maps](#) [Find Places](#) [Resources & Links](#)

Sasser Commercial Historic District, Georgia

Sasser Commercial Historic District is a park located in Terrell County, GA at N31.71989° W84.34769° (NAD83) and at an elevation of 314 ft MSL.

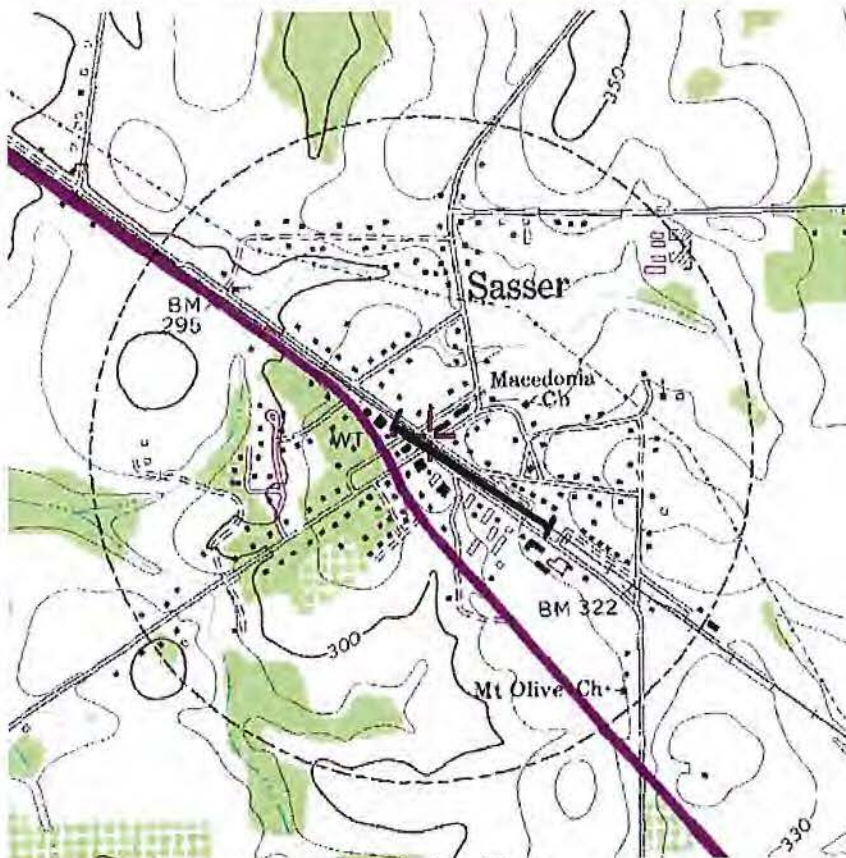
It can be seen on the USGS 1:24K topographic map [Sasser, GA](#).

Feature Type: Park
 Latitude: N31.71989° (NAD83 datum)
 Longitude: W84.34769°
 Elevation: 314 ft MSL
 County: Terrell County, Georgia

USGS 24K Map: [Sasser, GA](#)

USGS 24K MRC: 31084F3

You can view this location or feature in our [Topographic Map Viewer](#) now.



Click on map above to begin viewing in our Map Viewer.

Here are some other places near Sasser Commercial Historic District that may be of interest:

Feature Name	Type	Latitude	Longitude	Distance	View Map
Albany Lake	Reservoir	N31.6422°	W84.3656°	5.5 miles	View Map
Albany Lake Dam	Dam	N31.6352°	W84.3616°	5.9 miles	View Map
Anchorage Alcoholic Medical Center	Hospital	N31.6338°	W84.2566°	8.0 miles	View Map
Armena	Populated Place	N31.6810°	W84.2846°	4.6 miles	View Map
Ayresport Airport (historical)	Airport	N31.6452°	W84.3207°	5.4 miles	View Map

EXHIBIT F

PHOTOGRAPHS OF RIGHT OF WAY







