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March 12, 2018

Deb Barreiro
Georgia Department of Natural Resources
1 Conservation Way Suite 300
Brunswick, GA 31520

Re: CSX Timber Trestle at Milepost S 507.2

Dear Ms. Barreiro

Due to the length of the bridge and the tidal waterway, this project has been deferred for over 10 years because of cost and lack of access. It requires weekly maintenance at this point and cannot be deferred any longer. CSX has searched for less invasive alternatives but to no avail. The new substructure cannot be driven from a barge due to tide, nor the rail, due to the size of crane necessary to conduct the work. CSX has bid out the reconstruction of this bridge, intending construction from a barge, twice in the last four years. Each time resulting in vastly inflated cost estimates due to the risks associated with the tidal nature of the waterway. Many contractors simply declined to submit a bid stating that navigating a work barge and driving pile was not possible due to the extreme low tides. More time would be spent stuck in the muck than in performing work, and such an operation would pose undue safety risks for their crew. Furthermore, the substructure could not be driven from the rail due to two factors: 1) size of crane required to perform the work and 2) the lack of a laydown area at or near the bridge for the pile, hammer and leads.

CSX requests that a permanent access lane be permitted to remain in place for the future regular and any emergency maintenance (such as derailment or fire) required at this bridge. There is both heavy and frequent traffic on this line. A permanent access lane will provide unimpeded access to the bridge without interruption of traffic. In addition, the maintenance equipment can remain on the access, at the bridge during the work, without requiring shuttling along the rail to a location where it can then dismount the rail and wait in the clear for traffic to pass. It is important to understand that such shuttling and clearing will use up all or most of the available

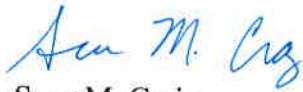
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time between trains, thus prolonging necessary maintenance and subjecting workers to the hazardous condition of working around rail traffic for extended periods of time.

The DNR has questioned the necessity of the proposed access road and asked why we couldn't close the line and detour around it. The necessity is detailed above and our response to the detour is as follows: This line is a main route of interstate commerce which carries freight and passenger trains and CSX is diligently trying to fulfill our federal obligation to maintain and operate this corridor. CSX has determined after exhausting all other options that the only safe and viable option to bring the crane and materials to the structure would be via an access road along CSX ROW. As previously stated, this structure is requiring constant repair and maintenance of failed members and now there is an imminent need for immediate replacement. Therefore, CSX respectfully requests that DNR issue the requested approval as any continued delay jeopardizes CSX's ability to comply with its common carrier obligations under Title 49 of the United States Code.

Best regards,



Sean M. Craig

Cc: Angie Johnson – CSX Engineering

Ed Sparks – CSX Engineering

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Bridge Replacement Project Description

The railroad bridge at milepost S507.2 has reached the end of its useful service life and needs to be replaced. The existing 368-ft long, 14-ft wide, 13 span, single track, timber bridge crosses Little Ogeechee River near Silk Hope, Chatham County, Georgia. The proposed replacement bridge will be 342-ft long, 16-ft wide, single track, prestressed concrete bridge. The new substructure foundation will consist of steel pipe piles which are to be filled with reinforced concrete after driving. The bents will be capped with new precast reinforced concrete caps. The new bridge will be within the limits of the existing bridge, along the existing track alignment. The proposed underclearance, is approximately 5 inches less at the channel span than the current underclearance at Ordinary High Water. The construction will be done on-line, phased between train traffic. The proposed new bents have been designed to be constructed with the existing bridge in place, to maintain rail traffic. After all new bents are in place, the existing timber spans will be removed and replaced with new precast prestressed spans during traffic windows. Upon completion of the placement of the new spans, the old timber bents will be removed to approximately 1-ft below the ground line and disposed of in an appropriate manner. A rip rap apron will be placed around the end bents under the bridge to protect the end bents and stabilize the shaded area.

To construct the new railroad bridge at milepost S507.2, a temporary 24 ft. x 365 ft. platform will be built on the west side of the existing bridge. The platform will initiate at the staging area and extend north. Upon completion of the project, the platform will be removed off-site.

**PROJECT DESCRIPTION AND
SUPPORT DOCUMENTATION FOR THE JOINT APPLICATION
REGARDING THE
ACCESS ROAD TO BRIDGE S507.2
FOR
CSX TRANSPORTATION
Chatham County, Georgia**

1 – Project Background

CSX Transportation (CSX or *applicant*), proposes the construction of an access road extending along the west side of the CSX S-Line railroad generally from the Abercorn Extension/Abercorn Street overpass (north of Milepost S508, at latitude and longitude of 31.993725° and -81.232053°) north to the south side of the bridge at Milepost S507.2 that crosses the Little Ogeechee River. The intended use of the road is to first provide construction access the bridge at Milepost S507.2 and an adjacent work platform for the replacement and secondly to provide access for future maintenance of the bridge structure and emergency response capabilities. An equipment and materials staging area is also proposed at the north end of the access road near the southwest bridge abutment. The length of the project, inclusive of the access road, staging area, and bridge, is approximately 3,034 feet. The bridge structure extends approximately 366 feet and 6 inches, the staging area extends ±150 feet, and the access road extends ±2,520 feet. The project area is located approximately 3 miles east of the City of Savannah in Chatham County, Georgia (Appendix 1, Figure 1). The right-of-way (ROW) for the railroad is 55 feet from center line of the rail for a total of 110 feet (Appendix 1, Figure 2). The project limits extend beyond the ROW to accommodate the placement of erosion control measures and for the construction of the temporary staging area.

Prior agency coordination was conducted in 2015 and 2016 for the replacement of the bridge structure and construction of the work platform. The U.S. Army Corps of Engineers (CE) responded in July 2015 (SAS-2015-00470) indicating that impacts along the approaches/abutments would be under CE jurisdiction, but that the bridge replacement itself would fall under U.S. Coast Guard (USCG) Section 9 jurisdiction. The USCG responded in November 2015 that the Little Ogeechee River, at the location of the project (project mile 14.8), met criteria for advance approval under 33 Code of Federal Regulations (CFR) 115.70 and that an individual

USCG bridge permit would not be required (see attached). The work platform was also covered under the advance approval letter; one platform will be constructed on the access road side of the bridge. The USCG advance approval expired in November 2017; however, a Bridge Project Questionnaire for USCG advance approval was re-submitted on 29 November 2017 (see attached). The *applicant* received another advance approval from the USCG on 18 December 2017; their letter indicated again that an individual USCG bridge permit would not be required. Furthermore, in February 2016, the *applicant* received a Letter of Authorization and Revocable License from the Georgia Department of Natural Resources (GDNR) for the bridge replacement (see attached).

The following information and attached materials are provided to pursue Coastal Marshlands Protection Act (CMPA) and Clean Water Act (CWA) Section 404 permits. The proposed work to the bridge pilings would be below the mean high water, but would not require a CE permit pursuant to Section of the Rivers and Harbors Act of 1899.

2 – Purpose and Need Statement

The Purpose and Need Statement is to satisfy 404 (b) (1) Guidelines and public interest review (33 CFR 320.4). The purpose of the project is to first provide safe and efficient access to the construction platform that would be adjacent to the bridge structure to be replaced and secondly to provide permanent future maintenance and emergency response access to the Bridge S507.2. The CSX Bridge S507.2 is part of the CSX S-Line (formerly Seaboard Air Line Railway) main north-south corridor of the CSX railway system along the eastern seaboard from New York to Miami, and carries a significant amount of interstate commerce. The bridge is being replaced due to aging timber and concrete piles. Bridge piles have been replaced and repaired to the extent possible in the past. Additional repairs on this section of railroad include maintenance of the railroad ties and ballast, which occurs twice a year. Currently, there is no overland access to the bridge for construction, repairs, maintenance, or emergency response. Regular maintenance requiring materials and work crews must currently be brought in by hi-rail vehicle within normal traffic windows with a maximum duration of 6 hours, which severely limits the ability to perform anything other than minor work. Due to the limitations using a high-rail, repairs to the bridge requiring heavy equipment at the site must either use barges or must cross the marsh. As described under Section 8.1 (Alternatives), access to the bridge via barges was proven to be considered a none viable option. In fact, Alternative 8.1.1 was advertised twice resulting in no bidders for the

project, with contractors reporting that the project was not achievable given the challenges associated with accessing the project site.

It was noted during the pre-application meeting on 20 October 2017 between the CE, Environmental Services, Inc. (ESI), and STV Inc., that vehicle access is provided for most CSX bridges, and that it is considered routine by CSX to have a permanent access road to the bridge. Based on preliminary research, approximately 50 percent of the CSX bridges in Georgia have permanent access/drivable roads. As stated above, this section of the CSX railroad is a highly traveled track, which limits any work to be completed within normal traffic windows. The line is part of the main line on the east coast for CSX, and provides car interchange at the Savannah rail yard. Over 35 million gross tons per year are carried on this line. The loads are heavier, wider, and longer than ever before; thus, the rail lines supporting these loads require more maintenance.

3 – Project Details and Impacts

3.1 Jurisdictional Determination:

On the attached *Wetland Exhibit* by Sundial Land Surveying, the limits of the jurisdictional salt marsh and freshwater wetland are depicted within the ±3.74-acre access road project limits, as delineated by ESI staff on 10 October 2017 (Appendix 3). The project site contains a total of 1.50 acres of salt marsh and 0.03 acre of freshwater wetland. Requests to verify this delineation were sent to the GDNR and CE (Appendix 4), which were received by those agencies on 24 October 2017; however, site visits to verify the wetland boundaries have not yet been conducted. The salt marsh wetland area is subject to CMPA jurisdiction. The freshwater wetland is located as a fringe along an open water/borrow pit and is subject to CE jurisdiction.

The salt marsh is subject to state water buffer requirements and project implementation would impact the state-mandated 25-foot salt marsh buffer. However, this activity would be exempt because the alterations within the buffer will be authorized pursuant to Georgia Code Section 12-5-286 (CMPA). A site visit was conducted on 19 October 2017 with the Local Issuing Authority (LIA, Chatham County Department of Engineering) regarding state-mandated buffers. According to the LIA, the open water/borrow pit is a state water, but it is not subject to state-mandated buffer requirements (see attached letter).

3.2 *Plan and Construction Details:*

As shown on the General Plan and Elevation sheet for the bridge (Appendix 5) prepared by STV Inc., the replacement bridge design includes the construction of 14 spans supported by concrete filled steel pipe piles. The piles are 36-inch-diameter piles to eliminate the need for double bents and to handle the longitudinal force. A saddle bent design is being used to help improve the horizontal clearance. The existing bridge timber (including the decking, pile bents, retaining walls, abandoned piles, supporting material, and hardware) and steel spans are being removed a minimum of 1 foot below the existing ground/mud line and will be disposed of properly by the contractor. A 10-foot wide riprap apron exists around the current terminal ends of the structure and will be maintained around the terminal ends of the new structure to stabilize the area. The proposed bridge design requires less ballast stone material under the rail, and is designed to contain that ballast within the bridge structure. The existing, accumulated ballast stone beneath the trestle will be removed down to the natural ground line. Construction activities for the bridge are expected to take up to 58 weeks.

Since the November 2015 USCG advance approval, the project description/design has been revised slightly. The length of the replacement bridge has been shortened to 342 feet 3 inches, from the previous 377 feet 3 inches. This length change is caused by bringing the two end bents of the bridge closer together. Due to the shifting of the end bents, Bent 1, which is located on the north end of the bridge, has been shifted approximately 6 feet to the south, which will also result in a shift of riprap further to the south. However, the movement of Bent 1 and the riprap will remain within the disturbed footprint of the existing apron. There will be no adjustment of fill to the east or west into the salt marsh due to the shift of Bent 1 and the riprap. Some of the individual span lengths have changed as well to avoid conflicts with parts of the existing structure during construction; however, the spans over the navigable portion of the waterway have not changed. Because existing trestle supports will be cut to the ground level, an increase in the navigational space between the bents will be realized. As compared to the bridge drawings that were submitted in support of the USCG advance approval in 2015, no significant changes to horizontal or vertical clearance of the bridge across the waterway are anticipated.

As shown on the Access Road Plan and Typical Section sheets (Appendix 5) prepared by STV Inc., the proposed access road consists of both a narrow permanent lane and a wider

temporary lane for heavy construction equipment to be used during construction of the bridge structure. The access road would extend a length of $\pm 2,520$ feet generally from the Abercorn Extension/Abercorn Street overpass northward to the proposed equipment and materials staging area near the southwest side of the bridge abutment. No portion of the access road or staging area would be placed in the open water channel of the Little Ogeechee River. Measured from the shoulder, the permanent maintenance lane would be ± 20 feet wide (including a 14-foot-wide travel lane) and the temporary access lane would be ± 12 feet wide. Extending to the toe of slope, the permanent lane width would be a maximum of 38 feet and a minimum of 28.48 feet, and the temporary lane width would be a maximum of 54 feet and a minimum of 43 feet. The project limits extend another 4 feet beyond temporary lane toe to slope to accommodate erosion control measures.

The temporary equipment and materials staging area, to be constructed on the north end of the project area, south of the river and near the west bridge abutment, would be approximately 150 feet long by 52 feet wide as measured from the existing toe of slope of the railbed to the shoulder of the staging area. From the staging area toe of slope, the staging area width would be a maximum of 68.75 feet. The 52-foot-wide area is inclusive of a 48-foot-wide work area and 45-foot-wide material laydown/staging area. The project limits extend another 4 feet beyond the toe of slope of the staging area. The near edge of the staging area would be 14 feet off the track centerline so as not to restrict rail traffic movements. The proposed work area would extend about 20 feet outside the ROW onto the adjacent neighbor's property. The additional footprint area is required for construction of the slopes. The staging area will also provide access to the temporary construction platform from which the bridge replacement activities will occur.

Construction of the access road and staging area would result in temporary impacts to the salt marsh. Only the upland scrub-shrub vegetation along the CSX rail toe of slope would be cleared. Salt marsh vegetation would not be cleared but would be covered with construction materials. Construction materials for the access road and staging area would consist of filter fabric, stone/gravel, and soil backfill. From the existing ground level, filter fabric would be placed first, followed by a layer of soil. Gravel/ballast (4-inch #57 stone) would be placed on top to a finished grade.

Construction of the access road, as well as use of the temporary portion of the access road during construction of the bridge, is anticipated to take up to 18 months. Upon completion of construction of the replacement bridge at Milepost S507.2, the gravel and soil materials within the temporary lane of the access road and the staging area would be removed and taken offsite to an appropriate upland disposal site. Should the soils become compacted, the elevation of the temporary access lane and staging area would be returned to pre-existing conditions. Further, the impacted areas would be allowed to naturally return to pre-existing (pre-construction) conditions. If the areas do not naturally re-vegetate within a 1-year time-period, the *applicant* would propose a re-vegetation plan at that time.

3.3 *Proposed Impacts:*

Site Name	Modification Type	Habitat	Area of Impact	Impact Type
CSX Access Road	Construction of temporary access lane and equipment/materials staging area	Vegetated Marsh	Temporary Impact 0.85 acre	Fill and cover of salt marsh vegetation for temporary construction access and staging area.
CSX Access Road	Construction and use of permanent access lane	Vegetated Marsh	Permanent Impact 0.63 acre	Fill and cover of salt marsh vegetation for permanent construction access and future maintenance access.
CSX Access Road	Installation of erosion control measures/silt fencing	Freshwater Wetland	Temporary Impact 0.0 acre, 39 square feet	Minor cutting of vegetation (at soil level) and/or disturbance to soils for installation of silt fencing.

All best management practices (BMP's) will be followed during the project, and only the necessary impacts, both temporary and permanent, will occur within the proposed project area boundary. Erosion control fencing will be placed near the edge of construction activities (within 4 feet from the toe of temporary fill slope) to ensure no slumping or movement of soils outside the work area.

4 – Marshland and Upland Components of Project

4.1 *Marshland Component of Project:*

The marshlands component of this project is the 1.48-acre area defining the temporary and permanent impacts within the project area boundary as depicted on the permit exhibits in Appendix 5. The entirety of this 1.48-acre area contains salt marsh vegetation, minimal unvegetated/bare ground areas.

4.2 *Upland Component of the Project:*

The upland component of the proposed project includes the existing CSX railroad/railbed paralleling the proposed project, and an approximate 30-foot wide strip of uplands beginning at delineated marsh line near Station 26807+50 and extending south to Station 26812+50 as depicted on the plans in Appendix 5.

4.3 *Marshlands Buffers for Upland Component:*

A 50-foot marshland buffer is measured inland from the coastal marshlands-uplands interface. All existing and proposed features located within this buffer are shown on the permit exhibits, Appendix 5. The CSX railroad travels through the salt marsh; the existing railbed and ballast currently occupy the 50-foot area measured east from the marsh boundary. Beginning near Station 26807+50, the 50-foot marsh buffer extends south. This area has experienced various level of disturbance in the past for the construction of the borrow pit for Abercorn Extension/Abercorn Street, and normal ROW maintenance. Land disturbance in this area is limited to the construction of the temporary access road. Following construction, the portion of the footprint needed for the construction purposes will be removed and the permanent access road will be retained.

Pursuant to regulations, all appropriate BMPs will be applied while construction occurs on site to include criteria and information specified in the most current Coastal Georgia Stormwater Supplement to the Georgia Stormwater Management Manual. A typical Erosion, Sedimentation, and Pollution Control Plan (ESPCP) will be in place according to the normal BMPs, which will include utilization of silt fencing, hay bale check dams, mulching, and temporary and permanent grass seeding, as appropriate. Upon completion of work, the disturbed areas that do not consist of permanent construction materials will be restored to, and maintained in, a natural vegetated state which will represent better site conditions than currently exist in the pre-construction condition. The permanent access road will remain as a pervious structure.

4.4 Storm water Management Plan of the Upland Component:

See above section. A storm water management plan is not required; however, it should be noted that the entire area of the upland component will be covered with pervious materials that which will allow flow through, as well as sheet flow off, into the surrounding natural ground.

4.5 Impervious Surface Calculations of the Upland Component:

The project involves the placement of soil and ballast stone within the upland component which are by nature considered pervious; therefore, impervious surface calculation is not applicable.

5 – Deed Information

Appendix 6 provides a ROW and track map associated with this project. This map includes the dates when the property was acquired to build the railroad line, most of which was in 1893. Because the CSX property is out of the jurisdiction of Chatham County, the deed and plat is not available from the County. Deeds acquired for ROW along the CSX rail are provided in Appendix 6. There are no known deed restrictions associated with the proposed project.

6 – Adjoining Landowners

A list of adjoining landowners and their addresses is attached in Appendix 7.

7 – Zoning & Landfill/Hazardous Waste Statement

On behalf of the *applicant*, ESI prepared letters for the purpose of contacting the appropriate Chatham County officials concerning zoning and hazardous waste/landfills within the project area (See Appendices 8 & 9 respectively). A response has not yet been received by Chatham County regarding zoning. The Chatham County Department of Engineering responded on 14 November 2017. ESI also reviewed the Hazardous Site Index established by the Georgia Environmental Protection Division (See Appendix 9, Figure 1). As a result of these efforts, it was determined that there are no known landfills or hazardous sites near the proposed project location.

8 – Description of Alternatives & Minimization of Impact Measures

8.1 *Alternatives*

8.1.1 CSX A-Line Access

CSX also owns and operates the A-Line railroad located south of the proposed project. CSX originally intended to install and utilize construction platforms on both sides of the existing bridge in order to perform the bridge replacement. Barges would be used to stage and transport materials and equipment to the site from the alternative access point associated with the A-Line located more than 2 river miles downstream located at Milepost A499.45. This alternative access would utilize an existing 9,000-foot, one-lane maintenance access road, similar to that being proposed for this project, along the A-Line. Challenges associated with this alternative include:

- This alternative was advertised twice and resulted in no bids to for the project. Contractors reported that the project was not achievable given the access challenges to the project site;
- The existing one-lane maintenance road is excessively long – 9,000 feet;
- The one-lane limits traffic to and from the river making material/equipment transfer inefficient;
- The northern terminus of the existing access does not contain enough room for vehicles to turn around. This creates a dangerous condition requiring all vehicles to back out the 9,000 feet to exit the site;
- To limit safety issues, a turnaround could be constructed. This would result in salt marsh impacts, but would not solve the existing one-lane access limitation;
- At the northern terminus of the alternative access road, a barge landing would be constructed to then serve as barge access for equipment and supplies approximately 2 river miles upstream to the proposed project site. Construction of the barge landing would result in additional impacts to the salt marsh;
- The proposed bridge replacement requires that concrete is poured in-place during the construction of the new pile and bent structures. Once the concrete begins to pour, that structure must be completed in one event retaining a “wet surface” of concrete for structural integrity. This requires that multiple concrete trucks are at the job site at the same time which would necessitate that multiple barges are on site and multiple trips up and down stream are performed;

- Tidal currents at the site are around 8 feet per second and the tide variation is approximately 6 feet. These conditions pose significant danger for work crews which, in emergency conditions, must work 24-hour days to restore service;
- Once materials and equipment are loaded on the barge, tidal periods work to dictate safe and efficient transportation to the bridge site;
- The long travel distances discussed above would require use of concrete “additives” that delay set times. Using additives in the concrete mix further complicates structural integrity and project logistics; and
- This alternative does not provide an efficient means for access to the bridge for future maintenance or emergency response activities.

After further consideration, this alternative access would also necessitate marsh impacts, would involve numerous barge transports up and down the river, and is considered impracticable, substandard, inefficient, and more dangerous than the proposed action. Thus, this alternative does not meet the purpose and need of this project.

8.1.2 Hi-rail Access

CSX considered use of a hi-rail vehicle for the bridge replacement. Generally speaking, hi-rail vehicles are vehicles that utilize the existing rail to transport equipment and materials to a work site. Consideration was given to utilize hi-rail vehicles for the entire bridge replacement activity and to transport equipment and materials to a staging area similar to that currently proposed. Challenges associated with this alternative include:

- This alternative is not practicable for the amount of material and equipment that would need to be taken to the bridge replacement;
- A technique known as “precision railroading” mandates that new bridge design supports quick replacement while also retaining normal traffic windows so the rail remains active. This retains operation of the trains but correlates to bridge designs having fewer piles and bents. Because there are fewer structures, replacement is faster; however, the mass of the new structures is also larger;
- Hi-rail vehicles do not have the load carrying capacity to transport the replacement bridge components to the site, nor to handle them at the site. For example, some of the precast concrete span elements lifting weight are approximately 30 tons and three are required per

span. The replacement bridge has been designed with the maximum use of precast elements to minimize the time required for construction and the duration of the environmental impact. These elements require equipment such as heavy crawler cranes which cannot be hi-rail mounted. Crawler cranes of the type necessary for this construction would typically have out-to-out tread widths of 20 feet or more, hence the width of the proposed work bridge under the Preferred Alternative;

- The railroad will remain active during construction of the bridge structure to the extent possible. Worker safety will be of the utmost concern while constructing the work platform and the bridge structure. As such, the use of hi-rail vehicles would be limited to those periods between scheduled train traffic;
- Use of hi-rail vehicles is limited to the single existing railway line. Access from Grove Point Road approximately 3,700 feet to the south remains a significant distance to move construction equipment and materials along a single railway line to and from the bridge;
- Any attempt to use hi-rail equipment to construct the replacement bridge would extend the construction period to many years given the number of trains on this line and the need to maintain the traffic. Because the hi-rail equipment needs to travel at least 3,700 feet to clear the railway for the passage of a train, each movement takes a significant amount of track time; and
- This alternative does not provide an efficient means for access to the bridge for future maintenance or emergency response activities.

Thus, this alternative does not meet the purpose and need of this project.

8.1.3 Total Removal of Access Road

This alternative considers the total removal of the access road upon completion of the bridge construction. Challenges associated with this alternative are similar to Alternatives 8.1.1 and 8.1.2 and include:

- Total removal of the overland access road would result in identical future access challenges as discussed above. Future construction, needing heavy lift equipment, would require the installation of same access road as currently proposed with the same impacts are currently proposed;

- Emergency response time to the bridge and rail will be negatively impacted compared to the preferred alternative;

Thus, this alternative does not meet the purpose and need of this project.

8.1.4 Install a Permanent Work Platform

Consideration was given to installing a permanent work platform adjacent to the bridge that would serve as a staging area for equipment and supplies during construction and later serve as a platform for future maintenance purposes. Challenges associated with this alternative include:

- Transport of equipment and supplies to the permanent work platform would either have to occur via the Alternative A-Line access or via use of hi-rail as mentioned earlier. Both options have significant limiting factors, thoroughly outlined above, that preclude their use as being practicable;
- The size of the permanent work platform could only accommodate limited supplies and still provide room for the equipment to perform the work. Therefore, the time to complete the construction would be extended significantly due to the inefficient space;
- This alternative becomes an “attractive nuisance” and an unacceptable public safety liability for CSX. There is a high likelihood that the public will use the work bridge as a fishing pier, which creates another safety hazard and liability for CSX;

Thus, this alternative does not meet the purpose and need of this project.

8.1.5 No-Build

Given the need to access the bridge to be reconstructed and maintained over time and the safety and logistical concerns, a No-Build Alternative does not exist for this project. There is no overland access to the bridge for construction, repairs, maintenance, or emergency response. Regular maintenance requiring materials and work crews must currently be brought in by hi-rail vehicle between normal traffic window, which severely limits the ability to perform anything other than minor work. Due to the limitations using a high-rail, repairs to the bridge requiring heavy equipment at the site must either use barges or must cross the marsh. The alternatives that discuss these other methods of access to the rail bridge, described under Section 8.1, are not considered viable options.

Thus, the no-build alternative does not meet the purpose and need of this project.

8.1.6 Preferred Alternative

The Preferred Alternative, as described under Section 3.2 (Plan Details), proposes an access road to consist of both a permanent road and a parallel temporary road to be used during construction of the bridge structure. The access road would extend a length of $\pm 2,520$ feet generally from the Abercorn Extension/Abercorn Street overpass northward to the proposed equipment and materials staging area near the southwest side of the bridge abutment. A temporary equipment and materials staging area would be placed on the north end of the project area on the south side of the river and near the west bridge abutment. Construction materials for access road and staging area would consist of filter fabric, stone/gravel, and soil backfill. Upon completion of construction of the replacement bridge at Milepost S507.2, the gravel and soil materials within the temporary lane of the access road and the staging area would be removed and taken offsite to an appropriate upland disposal site. Should the soils become compacted, the elevation of the temporary access road area would be returned to pre-existing conditions. Further, the impacted area would be allowed to naturally return to pre-existing (pre-construction) conditions. If the area does not naturally re-vegetate within a 1-year time-period, the applicant would propose a re-vegetation plan at that time.

Construction of an access road, where materials and equipment will be conveyed to the bridge site, will provide for safety of workers. As noted earlier, high-rail vehicle is the only method of access to the bridge at this time. However, the use of high-rail is not sustainable for future maintenance as it is not feasible for the amount of material to go out to the bridge during construction. Over-land access would be more feasible and desirable. Potential accidents are another reason for providing an access road to the bridge. Relying on high-rail with no permanent access road limits the response time and accessibility of emergency vehicles/personnel to the bridge area should a derailment occur. A permanent access road would help eliminate emergency access issues, and provide a safe travel corridor for unrestricted regular maintenance of this important link in the interstate transportation system. Thus, the Preferred Alternative provides safe and efficient access to the construction platform that would be adjacent to the bridge structure to be replaced, and provides for permanent future maintenance and emergency response access to the Bridge S507.2.

8.2 *Minimization Measures*

Minimization measures have been employed during the design phase of this project. One measure that was considered included work platforms along the bridge abutments. The original plan called for two temporary work platforms to be constructed with one on each side of the bridge. To reduce temporary impacts to the salt marsh and open water, a decision was made to construct one temporary work platform on the access road side of the bridge abutment.

Other considerations for minimization measures were given to the access road. The footprint of this road was designed to the minimum possible for the movement of equipment and materials during construction, and the movement of vehicles for future maintenance and more importantly, access to the site for emergency response in the event of a derailment. The original plan left the entire access corridor in place following construction to serve as future maintenance and emergency response access.

Further consideration was given to how to reduce the total footprint needed during construction to the minimum width necessary for future access. As such, the temporary portion of the access road will be removed once construction of the bridge was completed. Stone, backfill, and filter fabric materials will be removed from the temporary access lane and staging area and moved to an offsite upland location. The temporary access lane and staging area will then be restored to pre-existing (pre-construction) conditions by allowing these areas to naturally re-vegetate.

These measures assist in decreasing project impacts while still satisfying the project need and purpose.

9 – Erosion and Sedimentation Statement

Pursuant to CESAS Form 19; Question 16, B: 1,2,3.

- 1) All activities will be performed in a manner to minimize turbidity into the salt marsh and nearby Little Ogeechee River.
- 2) No oils or other pollutants will be released from the proposed activities which will reach the marsh or river.
- 3) All work will be performed in a manner necessary to avoid interference with any legitimate water uses.

10 – Public Interest Statement

The proposed construction and maintenance activities, as outlined above, have been designed to meet the specific project purpose, while minimizing adverse impacts to the surrounding ecosystems wherever possible. This has been demonstrated during the alternative discussions above. The proposed project will provide a safe access route both during the construction of the replacement bridge and during future maintenance activities on the bridge. During construction of the access road, BMPs will be implemented.

Pursuant to the Coastal Marshland Protection Act 12-5-286. (12)(g) In passing upon the application for permit, the committee shall consider the public interest, which, for purposes of this part, shall be deemed to be the following considerations:

- 1) *Whether or not unreasonable harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal;*

No unreasonable harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal. The bridge replacement will result in the removal of the existing and abandoned bent structures and the newly installed bents will offer more horizontal clearance than currently exist.

- 2) *Whether or not unreasonable harmful or increased erosion, shoaling of channels or stagnant areas of water will be created by this proposal; and*

This project will not cause unreasonable harmful or increased erosion. An ESPCP will be implemented during construction, and will include use of silt fencing and hay bale check dams, thereby limiting erosion. After construction is complete, temporary and permanent grass seeding will be utilized within disturbed uplands, where appropriate. There will be no shoaling of channels or areas of stagnant water as a result of this proposed project.

- 3) *Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, wildlife, or other resources, including but not limited to water and oxygen supply.*

The scope of this project does include habitat identified as essential fish habitat (EFH) for the Snapper-Grouper Fishery by the National Marine Fisheries Service (NMFS) pursuant to the federal Magnuson-Stevens Fishery Conservation and Management Act. EFH includes areas inshore of the 100-foot contour, such as (but not limited to) tidal creeks, estuarine emergent vegetated wetlands (salt marsh, brackish marsh), and unconsolidated bottom (soft sediments). No oyster aggregations were observed within the project site during field investigations conducted by STV Inc. and ESI.

The project could have a temporary minor adverse effect on water quality from the operation of heavy equipment during construction. However, this is a short-term effect which would subside once the construction was completed. Further, a total of 1.48 acres of salt marsh habitat would be impacted by the proposed project. To minimize project impacts, the area of temporary access will be removed following construction, stringent BMPs will be implemented in accordance with local, state, and federal regulations, and construction activities will be monitored by the contractor. In addition, standard manatee (*Trichechus manatus*) guidelines, as described further under Section 12, will be employed during construction. This project, as proposed, will have no unreasonable impact on water and oxygen supply in the area. As outlined above, there is nothing to suggest that the proposed project will unreasonably interfere with the conservation of fish, shrimp, crabs, or other marine life, wildlife, or other resources.

11 - Cultural Resource Assessment

In compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and amendments thereto, an analysis for archaeological and historic resources was conducted on the project site, especially those on, or eligible for inclusion in, the National Register of Historic Places (NRHP). Georgia's Natural, Archaeological, and Historic Resources GIS and the NRHP

websites were consulted in preliminary identification of historic resources. Lists of current and pending NRHP properties were checked and aerial photographs within the project site were consulted. Further, a site file search with the Georgia Archeological Site File, UGA Riverbend Research Labs was conducted to determine if there are any previously recorded archeological sites within a 1-mile radius of the project site. Three sites were identified within the 1-mile radius; however, none were located within the project footprint. Based on the review of the Site File Search and the available online resources, no existing or eligible NRHP archaeological resources are located within the project area.

In November and December 2017, ESI conducted a cultural resource assessment survey/HAER assessment of the CSXT Bridge S507.2 (Appendix 10). The assessment also included the rail leading to the bridge from Grove Point Road. The goal of the investigation was provided by the Savannah District CE and included a HAER-style documentation of the bridge to assess its significance for listing in the NRHP as mandated by federal laws and guidelines (CFR Title 36, Chapter VIII, Part 800 [36 CFR 800]). The NHPA requires the effect of a project on significant historic properties must be taken into consideration on all projects that involve federal assistance, licensing, and/or permitting, and the Advisory Council on Historic Preservation must be afforded an opportunity to comment on such effects.

According to this report, the rail is part of the CSX S-Line (formerly Seaboard Air Line Railway) that has followed this route since the 1880s. The rail has had a significant impact to the region, and is considered eligible for listing in the NHRP. However, the rail will not be impacted as part of the proposed bridge replacement project, thus, no additional work is proposed for the rail segment within the project site.

Bridge S507.2 was originally built in the 1880s, but was replaced with a near identical bridge in 1947. Given the current condition of the bridge elements, it is likely that most or all of the bridge has been replaced since the late 1940s as part of routine maintenance. While the bridge is in its original alignment, the current condition and lack of unique characteristics indicate it is not NRHP-eligible.

12 – Threatened and Endangered Species Assessment

An official and current list of federally protected species in Chatham County was obtained from the U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation

System (IPaC) website on 27 October 2017. According to the IPaC website, fifteen federally listed species potentially occur within the project area, including the North Atlantic right whale (*Eubalaena glacialis*), West Indian manatee, piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), red-cockaded woodpecker (*Picoides borealis*), wood stork (*Mycteria americana*), eastern indigo snake (*Drymarchon corais couperi*), green sea turtle (*Chelonia mydas*), Kemp's Ridley sea turtle (*Lepidochelys kempii*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*), frosted flatwoods salamander (*Ambystoma cingulatum*), Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*), shortnose sturgeon (*Acipenser brevirostrum*), and pondberry (*Lindera melissifolia*) (see attached IPaC list). Further, the gopher tortoise (*Gopherus polyphemus*), which is a federal Candidate species, was also identified although this species is not currently afforded federal protection. There are no designated critical habitats within the project site or immediately surrounding areas.

The project site does not contain suitable habitats to support the species identified for the project area with the possible exception of the manatee, shortnose sturgeon, and wood stork. This is due to the generic habitat types used by these species. No protected species have been observed on/near the project site during various site visits and the wetland delineation conducted from late September through October 2017. The Little Ogeechee River does not represent suitable habitat for the Atlantic sturgeon; adult fish prefer large, deep rivers during spawning, and juveniles/subadults/adults are found in shallow (depth of 10-50 meters) nearshore areas dominated by gravel and sand. However, the Little Ogeechee River in the vicinity of the project site may support shortnose sturgeon during the winter months. Given the lack of species occurrence and/or lack of suitable habitat, project implementation is expected to have *no effect* on the remaining federally protected species identified for the project area.

Wood storks primarily feed in brackish wetlands and nest in cypress or other wooded swamps. Nesting habitat is not present within the project area, but suitable feeding habitat for wood storks does exist within the salt marsh. However, given the lack of observations, limited nature of the project, and the vast availability of salt marsh habitat in the project area and region, we have determined that project implementation is expected to have *no effect* on the wood stork.

Although the Little Ogeechee River is located along a portion of the project site, no in-water activities are proposed with construction of the access road. However, the CE mentioned

during the 20 October 2017 pre-application meeting that impacts from construction of the bridge must also be considered because the access road would be supporting the construction and maintenance of that bridge structure.

Although the project area may provide suitable habitat for the manatee and shortnose sturgeon species, the construction techniques to be used for pile driving the bridge support structures is expected to have a negligible impact on water quality. The following recommended measures/construction techniques will be implemented during construction of the bridge structure that will be protective of the manatee and that would be mutually beneficial for sturgeon species:

- Siltation barriers will be made of material in which manatees cannot become entangled, are properly secured, and are regularly monitored to avoid manatee entrapment. Barriers will not block manatee entry to or exit from essential habitat.
- All vessels in the Little Ogeechee River associated with the project will operate at “no wake/idle” speeds at all times while in the construction area. All vessels will follow routes of deep water whenever possible.
- All on-site project personnel are responsible for observing water-related activities for the presence of manatees. All construction activities in open water will cease upon sighting of manatees within 50 feet of the project area. Construction activities will not resume until the manatee(s) have left the project area for at least 30 minutes.
- Extreme care will be taken in lowering equipment or materials below the water surface and into the river bed, taking any precaution not to harm any manatee(s) that may have entered the construction area undetected. All equipment or materials will be lowered at the lowest possible speed. The maximum speed at which these items will be lowered will be 10 feet per minute.

BMPs and the above techniques will be utilized during the construction process so that water quality is not compromised in the salt marsh or waterway. Project-related effects on manatee and sturgeon species should be considered insignificant because any habitat loss and/or disturbance would be only a very small percentage of the habitat that is available to them near the project site. Thus, due to the implementation of the measures listed above, and the limited construction-related impacts from the bridge structure, the proposed project *may affect, but is not likely to adversely affect* the manatee and sturgeon species.

13 – Mitigation Proposal

As outlined above, the project proposes 0.63 acre of permanent impacts and 0.85 acre of temporary impacts to tidal wetlands (salt marsh). The project also proposes 39 square feet (0.0 acre) of temporary impact (cutting of vegetation to ground level and minor disturbance to soils) to the freshwater wetland for the installation of erosion control fencing. Because this is a temporary impact on a minute scale, no mitigation for the impact to the freshwater wetland is proposed. However, once construction is complete, the fencing will be removed and any vegetation that was cut will be allowed to return to pre-existing conditions.

Attached is the SOP worksheet defining the total required mitigation credit calculation of 11.45 credits for impacts to salt marsh wetlands due to project implementation. The calculation includes 5.418 credits for permanent impacts and 6.035 credits for temporary impacts to salt marsh wetlands. There are no onsite mitigation options available. Following discussions with the *applicant*, there are also no readily available permittee-responsible mitigation options near this site. Turning attention to mitigation bank options, research was conducted for available credits through the CE Regulatory In-lieu Fee and Bank Information Tracking System (RIBITS). The result of this search demonstrates the project is in the Lower Ogeechee River watershed (Hydrologic Unit Code [HUC] 03060202), and that there are no public tidal mitigation credits available. However, because the project is located within a tidal estuarine habitat, a review of mitigation banks that are in a similar landscape position and offer similar resource types were reviewed.

The Ogeechee River Mitigation Bank provides compensatory mitigation for tidal impacts, and this bank is in the same HUC as the project site. The Ogeechee River Mitigation Bank may offer the successful replacement of lost functions and values to that of the impacted area and the bank avoids any temporal loss that could exist with an onsite or near site permittee-responsible mitigation alternative. Thus, the *applicant* considers mitigation for the proposed impacts at the Ogeechee River Wetland Mitigation Bank as one option. However, it is not known at this time if a sufficient number of credits will still be available at the time of purchase.

At the time this application was submitted, ESI was also in discussions with two alternative mitigation sources for this project. One alternative includes a pending salt marsh mitigation bank, and the alternative includes enhancements to previously altered salt marsh areas in eastern

Chatham County. The project team will continue to assess mitigation options and the final mitigation plan will be presented to the CE for consideration of ultimate approval.

May, Bradley P.

From: Lopes, Jared M SAS [Jared.M.Lopes@usace.army.mil]
Sent: Thursday, July 30, 2015 12:34 PM
To: May, Bradley P.
Subject: SAS-2015-00470-CSX Transportation -- section 9 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Mr. May,

I discussed the SAS-2015-00470 project with my supervisor to determine its eligibility under section 404/10. While additional impacts to wetlands along the approaches/abutments of the bridge may be part of our jurisdiction under NWP #15, the bridge replacement itself is under the U.S. Coast Guard Section 9 jurisdiction.

The pilings supporting your bridge would be below mean high water, but would not require a Department of the Army permit pursuant to Section 10 Rivers and Harbors Act of 1899. The authority of the Secretary of the Army and Chief of Engineers with respect to bridges was transferred to the Secretary of Transportation under the Department of Transportation Act of October 15, 1966. I recommend you contact the U.S. Coast Guard at the address below for information on permitting bridges.

If you should have any questions or concerns, please feel free to contact me at 912-652-5348.

V/R,

Jared M. Lopes
Regulatory Specialist

U.S. Army Corps of Engineers
Savannah District
Regulatory Division, Coastal Branch
100 West Oglethorpe Avenue
Savannah, Georgia 31401
912-652-5348 (phone)

V/R,

Jared M. Lopes
Regulatory Specialist

U.S. Army Corps of Engineers
Savannah District
Regulatory Division, Coastal Branch
100 West Oglethorpe Avenue
Savannah, Georgia 31401
912-652-5348 (phone)

Classification: UNCLASSIFIED
Caveats: NONE

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Seventh District

909 SE 1st Ave. Ste 432
Miami, FL 33131-3028
Staff Symbol: (dpb)
Phone: (305) 415-6740
Fax: (305) 415-6763
Email: jennifer.n.zercher@uscg.mil

16591/GA
December 18, 2017

Ms. Angela Johnson
CSX Transportation
Senior Design Engineer, Bridge Dept
500 Water Street, SC350
Jacksonville, FL 32202

Dear Ms. Johnson:

This letter is in response to an email submitted on your behalf, dated November 29, 2017, concerning the proposed CSXT Railroad Mile Post S507.2 bridge replacement across Little Ogeechee River at Savannah, Chatham County, Georgia.

The Coast Guard has determined that Little Ogeechee River, at your project location, mile 14.8 (lat/long 31.998911, -81.224864) meets the criteria for advance approval per 33 CFR 115.70. A Coast Guard bridge permit will not be required for the proposed replacement of the railroad bridge. Although an individual Coast Guard bridge permit is not required, the following stipulations apply:

1. You must comply with all applicable federal, state, and local laws and regulations.
2. Upon completion of construction provide, to this office, a set of "as-built" drawings which include horizontal and vertical clearance of the bridge across the waterway.
3. When the bridge is no longer used for transportation purposes, it must be removed in its entirety and you must notify the Coast Guard that the waterway has been cleared.

This advance approval determination will not necessarily apply to future modifications of this bridge or the construction of other bridges along this waterway. Waterway usage may change over time and increased activity along this waterway could remove it from the Advance Approval category. If construction of this bridge is not commenced within 2 years from the date of this letter, please submit an updated "Bridge Project Questionnaire" for reconsideration.

If you have any questions concerning this determination please call me at (305) 415-6740.


JENNIFER N. ZERCHER
Bridge Management Specialist
U.S. Coast Guard

Copy: USCG MSU Savannah (e-copy), Adam.C.White@uscg.mil
Bill White, STV INC (e-copy), Bill.White@stvinc.com

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Seventh District

909 SE 1st Ave. Ste 432
Miami, FL 33131-3028
Staff Symbol: (dpb)
Phone: (305) 415-6740
Fax: (305) 415-6763
Email: jennifer.n.zercher@uscg.mil

16591/GA
November 2, 2015

Mr. Ed Sparks
CSX Transportation
Assistant Chief Engineer - Structures
500 Water Street, SC350
Jacksonville, FL 32202

Dear Mr. Sparks:

This letter is in response to your email dated September 30, 2015 concerning the proposed CSXT Railroad Mile Post S507.2 bridge replacement across Little Ogeechee River at Savannah, Chatham County, Georgia.

The Coast Guard has determined that Little Ogeechee River, at, your project mile 14.8 (lat/long 31.998911, -81.224864) meets the criteria for advance approval per 33 CFR 115.70. A Coast Guard bridge permit will not be required for the proposed railroad bridge. Although an individual Coast Guard bridge permit is not required, the following stipulations apply:

1. You must comply with all applicable federal, state, and local laws and regulations.
2. Upon completion of construction provide, to this office, a set of "as-built" drawings which include horizontal and vertical clearance of the bridge across the waterway.
3. When the bridge is no longer used for transportation purposes, it must be removed in its entirety and you must notify the Coast Guard that the waterway has been cleared.

This advance approval determination will not necessarily apply to future modifications of this bridge or the construction of other bridges along this waterway. Waterway usage may change over time and increased activity along this waterway could remove it from the Advance Approval category. If construction of this bridge is not commenced within 2 years from the date of this letter, please submit an updated "Bridge Project Questionnaire" for reconsideration.

If you have any questions concerning this determination please call me at (305) 415-6740.

A handwritten signature in black ink, appearing to read "JENNIFER N. ZERCHER".

JENNIFER N ZERCHER
Bridge Management Specialist
U.S. Coast Guard

Copy: Coast Guard Sector Charleston, SC via email to john.z.downing@uscg.mil
Bradley May, STV INC via email bradley.may@stvinc.com

BRIDGE PROJECT QUESTIONNAIRE

The Coast Guard must determine whether or not a Bridge Permit is required for your project. By providing full and accurate information on this form, you will assist in our decision making process. Errors or misstatements may require redesigning of your bridge, and may subject you to civil penalty sanctions. If you have any questions regarding this form, do not hesitate to contact the Bridge Administration Branch at the letterhead address or phone number. Regarding the site of your proposed bridge, please provide the following information:

NAVIGATION DATA:

1. Name of waterway: Little Ogeechee River
- 1a. At proposed site, mileage along waterway measured from mouth or confluence 1.2
- 1b. Waterway is a tributary of Atlantic Ocean at mile _____
2. Geographical Location: CSXT Railroad Milepost S507.2 near Savannah, Chatham Co., GA
(Road Number, City, County, State)
3. Township, section and range, if applicable: N/A
4. Is the waterway tidally influenced at proposed bridge site? Y Range of tide? 8-ft
5. Depth and width of waterway at proposed bridge site:

	Depth	Width
At Mean High Tide	<u>15-ft</u>	<u>250-ft</u>
At Mean Low Tide	<u>7-ft</u>	<u>135-ft</u>
6. Check the type(s) of present vessel traffic on the waterway:
Canoe _____ Rowboat _____ Small Motorboat X Cabin Cruiser _____
Houseboat _____ Pontoon Boat _____ Sailboat _____ Tug and tow _____ None _____
- 6a. Provide the vertical clearance required for the largest vessel using the waterway 2.5-ft
- 6b. Provide a photograph of each type vessel using the waterway.
7. Are these waterways used to transport interstate or foreign commerce? Yes _____ No X
- 7a. Are these waters susceptible to use in their natural condition, or by reasonable improvement, as a means to support interstate or foreign commerce? Yes _____ No X
- 7b. To your knowledge, are there any planned waterway improvements to permit larger vessels to navigate? No. If so, what are they? _____

8. Are there any natural or manmade obstructions, bridges, dams, weirs, etc. downstream or upstream? Yes X No _____

8a. If yes, provide upstream/downstream location with relation to the proposed bridge.
Bridge on HWY 17 approximately 1.4 mile upstream

8b. If the obstruction(s) are bridges, provide vertical clearance at mean high water and mean low water and horizontal clearance normal to axis of the waterway. Vertical Clearance: MHW 2 MLW 7 Horizontal clearance Low hwy bridge at 45° to channel, 36' spans not skewed to channel

8c. Provide a photograph of the bridge(s) from the waterway showing channel spans.

9. Will the proposed structure replace an existing bridge? Yes

9a. Provide permit number and issuing agencies of permits for the bridge(s) to be replaced.

9b. Provide the vertical clearance above mean high water and mean low water and the horizontal clearance normal to axis of waterway. Vertical Clearance: MHW 2.5-ft MLW 11-ft Horizontal Clearance 18-ft

9c. Provide a photograph of the to-be-replaced bridge from the waterway, showing the channel span(s).

10. List the names and addresses of persons whose property adjoins the bridge right of way.
Bragg H L Jr, 6 Bragg Dr, Bloomingdale, GA 31302
JS&H Enterprises LLP, PO BOX 16447, Savannah, GA 31416

List names and addresses/location of marinas, marine repair facilities, public boat ramps, private piers/docks along waterway within ½ mile of site.

N/A

11. Attach a location map and plans for the proposed bridge; show the vertical clearances above mean high water and mean low water and the horizontal clearance normal to axis of the waterway.

12. Attach three (3) photographs taken at the proposed bridge site: one looking upstream, one looking downstream, and one looking along the alignment centerline across the bridge site.

DATE: 29Nov2017 Print Name and Agency: Willis S. White, III STV Incorporated

Signature: 

ATTACHMENTS: Location Map
Bridge Plans
Photographs
Additional pages of names and addresses (if necessary)



Gregori S. Anderson, CBO
Director

CHATHAM COUNTY
DEPARTMENT OF BUILDING SAFETY &
REGULATORY SERVICES

P.O. BOX 8161
SAVANNAH, GEORGIA 31412-8161

Ph: 912-201-4300
Fax 912-201-4301



Clifford Bascombe, CBO, CFM
Assistant Director

December 28, 2017

Michael DeMell
Environmental Services, Inc.
P.O. Box 2383
Savannah, Ga. 31402

RE: CSXT access to Bridge S507.2

Dear Mr. DeMell:

The above project is in compliance with local zoning laws and is consistent with local zoning regulations.

If you have any questions, I can be reached at 912-201-4307.

Sincerely,


Robert Sebek, Zoning Administrator
Chatham County



CHATHAM COUNTY DEPARTMENT OF ENGINEERING

124 Bull Street, Room 430
P.O. Box 8161
Savannah, Georgia 31412-8161
FAX 912-652-7818
912-652-7800

Leon Davenport, P.E.
County Engineer

Suzanne Cooler, P.E.
Assistant County Engineer

October 19, 2017

Ms. Elaine Ceccacci
Environmental Services, Inc.
Via email

Subject: State Waters Buffer Determination, CSX Transportation Access Road to
Bridge S507.2

Dear Ms. Ceccacci,

This letter serves to confirm that State Waters are located adjacent to the above referenced project; however, no wretched vegetation was observed at the pond on the adjoining property at the time of inspection, therefore no State Waters Buffer is required. Other buffers and restrictions may exist on the site and this letter does not relieve you of the responsibility of obtaining local, state or federal permits or other authorizations pertaining to the site for any proposed or future disturbance. A buffer determination for the areas adjacent to coastal marshlands was not conducted at this time.

This State Waters buffer determination is valid for 1 year from the date of inspection.

If you have any other questions or concerns, please do not hesitate to call me at 652-7864.

Sincerely,

Jefferson T. Kirkland
Environmental Program Coordinator

cc: Bob Sebek, Zoning Administrator, Chatham County
Nick Milionis, Civil Engineer III, Chatham County



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
105 Westpark Drive
Westpark Center Suite D
Athens, GA 30606-3175
Phone: (706) 613-9493 Fax: (706) 613-6059



In Reply Refer To:
Consultation Code: 04EG1000-2018-SLI-0234
Event Code: 04EG1000-2018-E-00353
Project Name: CSX Access to Bridge S507.2

October 27, 2017

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

This list identifies threatened, endangered, proposed and candidate species, as well as critical habitat, that may be affected by your proposed project. This list may change before your project is completed. Under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this list should be verified after 90 days. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation.

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.). Projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html).

Wind energy projects should follow the wind energy guidelines <http://www.fws.gov/windenergy/> for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts of communication towers on migratory birds can be found under the "Bird Hazards" tab at: www.fws.gov/migratorybirds.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Georgia Ecological Services Field Office

105 Westpark Drive

Westpark Center Suite D

Athens, GA 30606-3175

(706) 613-9493