DOCKET NO. 45045 - REPORTER ERRATA SHEET

THE FOLLOWING CORRECTIONS ARE MADE AT THE CONCLUSION OF VOLUME IV:

Volume I, Page No. 42: Should include the prefiled rebuttal testimony of Benjamin Tarbutton. It is attached at Page Nos. 1477 - 1507 at the end of Volume IV.

And the reason for the change is: I did not include his prefiled rebuttal testimony after his direct testimony. This was an oversight on my part.

Volume I, Page No. 210: Should include the prefiled rebuttal testimony of Scott Dickson. It is attached as Page Nos. 1508 - 1513 at the end of Volume IV.

And the reason for the change is: I did not include his prefiled rebuttal testimony after his direct testimony. This was an oversight on my part.

Volume I, Page No. 224: Should include the prefiled rebuttal testimony of Arnie Pittman. It is attached as Page Nos. 1472 - 1476 at the end of Volume IV.

And the reason for the change is: I did not include his prefiled rebuttal testimony after his direct testimony. This was an oversight on my part.

Page Nos. 234-241 are the wrong documents and they should not be included in the transcript. The direct testimony of Cale Veal should be inserted instead at Page Nos. 1464 - 1471.

And the reason for the change is: I mistakenly attached the wrong documents.

Add SRR Exhibits 50 (Page No. 1514 - 1563 and Exhibit 51 at Page Nos. 1564 - 1570.)

And the reason for the change is: I mistakenly left them out.

Brenda P Elwell

Brenda Elwell, RPR, CCR-B-2023

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

DIRECT TESTIMONY OF CALE VEAL

to be presented as a panel consisting of
Jeff Custer, Scott Dickson, Arnie Pittman, and Cale Veal
on behalf of Sandersville Railroad Company

July 21, 2023

L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com
Robert S. Highsmith Jr.
Georgia Bar No. 352777
Laura E. Flint
Georgia Bar No. 635203
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
Telephone: (404) 817-8500
Facsimile: (404) 881-0470
robert.highsmith@hklaw.com
laura.flint@hklaw.com

INTRODUCTION

Q. PLEASE STATE YOUR NAME, EMPLOYER, POSITION OR TITLE, AND BUSINESS ADDRESS.

A. My name is Cale H. Veal. I am the sole managing member of Veal Farms Transload, LLC ("Veal Farms Transload"), and I am a managing member of Revive Milling, LLC ("Revive Milling"). I am also an interest holder in numerous other companies, including, but not limited to, Veal Farms Trucking, LLC and Veal Farms, LLC. My business address is 811 E. South Central Avenue, Tennille, Georgia 31089.

Q. STATE YOUR EDUCATIONAL BACKGROUND, WORK EXPERIENCE, AND YOUR ORGANIZATION'S BACKGROUND.

A. In 2000, I graduated from John Hancock Academy in Hancock County, Georgia. From the ages of 16 to 21 years old, before and after graduating high school, I worked in kaolin plants in Washington County, Georgia and operated a sole proprietor farming enterprise that produced grains and legumes. At 21 years old, I started businesses specializing in erosion, sedimentation, and pollution control as well as grain merchandizing. Those businesses, included, but are not limited to, a general partnership and Veal Farms & Erosion Control, LLC.

I am still in the farming business. Today, my farming business is now known as Veal Farms, LLC. We produce grain for companies, including, but not limited to, subsidiaries and affiliates of Perdue foods and the Scoular company.

I also own a trucking company known as Veal Farms Trucking, LLC which

delivers agricultural products from rail to end users and from producers to rail.

Q. PLEASE EXPLAIN THE BUSINESS OF VEAL FARMS TRANSLOAD, LLC AND REVIVE MILLING.

A. Veal Farms Transload buys, stores, and loads to rail grains and other agricultural products for its own and its customers' uses. Revive Milling buys and processes grain into food ingredients, such, as starches, and then sells and transports those refined ingredients by rail to food producers.

Veal Farms Transload is the only certified organic transload facility registered with the Food and Drug Administration ("FDA"). Similarly, Revive Millings is the only facility in the State of Georgia certified by the FDA as a non-GMO and organic milling facility. We transport from our facilities in Tennille, Georgia by rail and truck agricultural products from an approximately 150-mile radius around Tennille.

Q. HOW DO YOU INTEND TO USE THE HANSON SPUR?

A. The Hanson Spur is a unique opportunity for Veal Farms Transload, Revive Milling, our customers, and farmers through east middle Georgia to access markets that are presently unavailable to them due to the cost of transportation and/or to reduce the cost to end users and consumers that must be passed through due to unnecessarily high transportation costs. CSXT's rail system serves markets that Norfolk Southern does not serve directly, and vice versa.

Presently, Veal Farms Transload and Revive Millings only ship agricultural products on Norfolk Southern's system because we do not have direct access to the CSXT systems. Our facilities are only connected to the Norfolk Southern system, via Sandersville Railroad's mainline in Washington County, Georgia. Because the volume of grain and other agricultural good is not sufficient to justify a stop for less than a unit train, it is not feasible for Norfolk Southern and CSXT to serve grain elevators and other agricultural transload facilities throughout the State of Georgia. And, there is no shortline railroad connected to the CSXT system in our area of east middle Georgia.

To ship agricultural products by rail on the CSXT rail system, we must first ship on Norfolk Southern's rail system and then switch to CSXT's rail system. Switching between railroads carries a substantial cost charged by railroads that either makes transport by rail uneconomic or drives up the cost of consumer products. In many instances, the added switching costs make rural east middle Georgia farms uncompetitive in certain markets as compared to farmers in other areas that have direct access to the CSXT system, such as, farmers in neighboring Alabama, Tennessee, and North Carolina.

For example, there are various agricultural products with markets in the New England area that can be and are currently grown in Georgia. Those products, include, but not are limited to, soft red winter wheat, organic corn, and soybeans. However, those products are not typically transported from east middle Georgia to those markets because of the lack of viable rail access.

The Hanson Spur also will allow us to deliver High Erucic Acid Rapeseed ("HEAR") to the only crush facility for HEAR in the country which is in Trenton, Kentucky, and CSXT is the railroad directly servicing that facility. HEAR is processed at that crush facility to produce high erucic acid which is an essential ingredient in biodegradable plastics. Veal Farms Transload is the largest supplier in Georgia, Alabama, and the Carolinas of HEAR to that facility.

HEAR can be grown in Kentucky and other states near the HEAR crush facility; however, global warming and global weather changes have increased extreme weather events. Those extreme cold events have resulted in substantial failures of HEAR crops in states to the north of Georgia. Consequently, the demand for Georgia-grown HEAR is increasing rapidly.

Currently, Georgia-grown HEAR must be trucked to Trenton, Kentucy because it is less expensive to ship HEAR by truck than to pay the cost to originate shipments of HEAR on the NS system and switch them to the CSXT system. The Hanson Spur will drive down the cost of and proliferate biodegradable plastics throughout the country by making them cheaper to produce and, therefore, competitive with traditional, non-biodegradable plastic products.

Additionally, the Hanson Spur also will allow us to deliver by rail non-GMO starches to new markets, served directly by the CSXT rail system, in Ohio, Iowa, and Arkansas. These facilities will use these non-GMO starches to produce pastas, cookies, crackers, tortillas, and other similar food products.

Q. WILL THE HANSON SPUR BENEFIT THE LOCAL ECONOMY, ENVIRONMENT, AND INFRASTRUCTURE?

A. Yes, for the reasons I've discussed earlier in my testimony, the Hanson Spur will reduce truck volume throughout the State of Georgia and Hancock County, Georgia. The Hanson Spur will also provide local farmers more cost-effective access to end users and other consumers of their products, thereby increasing the demand for Georgia-grown crops. We believe the Hanson Spur will create positive environmental change by decreasing the cost to produce biodegradable plastics and by making them more competitive in the marketplace. Sandersville Railroad, as the only shortline railroad serving agriculture in east middle Georgia, is the only company that can provide this service and help Hancock County, Washington County, and the rest of our customers throughout east middle Georgia create clean economic growth and prosperity in Georgia's heartland.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **Direct Testimony of Cale Veal** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Sallie Tanner
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.state.ga.us

Rob Trokey
Director, Electric Unit
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
rtrokey@psc.state.ga.us

Nancy G. Gibson
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.state.ga.us

Jamie Rush
Malissa Williams
Miriam Gutman
The Southern Poverty Law Center
150 E. Ponce de Leon Avenue
Suite 340
Decatur, Georgia 30030
jamie.rush@splccenter.org
malissa.williams@splccenter.org
miriam.gutman@splccenter.org

Robert Highsmith
Laura Flint
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Don and Sally Garrett
1335 Shoals Road
Sparta, Georgia 31087
sallygarrett45@yahoo.com

Blaine and Diane Smith
823 Chatsworth Drive
Accokeek, MD 20607
Wbs10408@aol.com
hdianesmith@gmail.com

Grant E. McBride
Smith Welch Webb & White
2200 Keys Ferry Court
McDonogh, GA 30523
gmcbride@smithwelchlaw.com

Elizabeth L. Sanz
Renee D. Flaherty
Institute for Justice
901 N. Glebe Road
Suite 900
Arlington, Virginia 22203
bsanz@ij.org
rflaherty@ij.org

Marvin and Pat Smith
15500 Avery Road
Rockville, MD 20855
marvin.smithjr@yahoo.com
pjsmax@hotmail.com

Thomas Ahmad Lee
821 Brookriver Drive, Suite 246
Dallas, Texas 75247
tlee1827@yahoo.com

Joel Reed
Kathy Reed
5 Dogwood Lane
Chatsworth, Georgia 30705
Jbreed48@yahoo.com

No Railroad in Our Community Coalition
c/o Janet P. Smith and David Mark Smith
929 Shoals Road
Sparta, Georgia 31087

William R. Maurer
Institute for Justice
600 University Street
Suite 1730
Seattle, WA 98101
wmaurer@ij.org

Sally G. Wells
140 Dunn Road
Sparta, Georgia 31087
sllywells@yahoo.com

Herus Ellison Garrett
111 Brookwood Court
Eatonton, Georgia 31024

Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

Verne Kennedy Hollis
373 Hamilton St.
Sparta, Georgia 31087
vkenn41@yahoo.com

Leo Briggs
Georgia Briggs
4500 Hidden Stream Drive
Loganville, Georgia 30052
lgbriggs@earthlink.net

Donna N. Garrett
154 Lakeview Drive
Sparta, Georgia 31087
ngarrett64@yahoo.com

This 21st day of July 2023.



L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038

Counsel for Petitioner Sandersville Railroad Company

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

REBUTTAL TESTIMONY OF ARNIE PITTMAN

September 28, 2023

L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

Robert S. Highsmith Jr.
Georgia Bar No. 352777
Laura E. Flint
Georgia Bar No. 635203
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
Telephone: (404) 817-8500
Facsimile: (404) 881-0470
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Louie Arnold ("Arnie") Pittman, III. I am the President of Pittman Construction Company ("Pittman Construction"). My business address is 1487 Farmer Road NW, P.O. Box 155, Conyers, Georgia 30012-7016.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

A. Yes, I testified on behalf of Sandersville Railroad Company in the Company's direct case, via written direct testimony pre-filed on July 21, 2023.

Q. DO YOU HAVE ANY CORRECTIONS OR CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED ON JULY 26, 2023?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to show why it is not viable for Pittman Construction to receive liquid asphalt (delivered via the CSXT system) at a transload facility in Hancock County that is not located at the Hanson Quarry, transload that liquid asphalt to trucks, and then truck that liquid asphalt over public roads to our Sparta facility. Frankly, that is not a financially viable solution for our business.

We currently ship liquid asphalt by rail to our APS facility in Lithonia, which is on the CSXT system. We then transload the liquid asphalt to trucks at Lithonia and then truck it to our Sparta facility, which is located at the Hanson Quarry.

If the Hanson Spur is built, we will not need to transload liquid asphalt in Lithonia and then truck it over public roads to our Sparta facility. Instead, we will ship liquid asphalt directly to our Sparta facility via the CSXT system and then the Hanson Spur. This will eliminate any need for trucking liquid asphalt on public roads in the movement of liquid asphalt from the refinery to our Sparta facility.

Faced with the decision of whether to transload at an off-site facility in Hancock County or continue to transload at the APS facility in Lithonia, we would continue to transload at our APS facility in Lithonia. The benefit of Sandersville Railroad's switching service over the Hanson Spur from the CSXT system is that we obviate the need for trucking inbound liquid asphalt over public roads and thereby lower our transportation costs. By constructing and operating the Hanson Spur, Sandersville Railroad will open a new channel of trade for us, which avoids the need to transport in-bound liquid asphalt by truck on public roads.

Q. SO, YOU WOULD NOT EXPECT TO ENGAGE IN LONG-TERM BUSINESS RELATIONS WITH SANDERSVILLE RAILROAD IF THE RAILROAD COULD NOT OFFER YOU DIRECT SWITCHING SERVICES AT YOUR SPARTA PLANT?

A. That is correct.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **REBUTTAL TESTIMONY OF ARNIE PITTMAN** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Sallie Tanner*
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Rob Trokey
Director, Electric Unit
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
rtrokey@psc.ga.gov

Nancy G. Gibson
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.ga.gov

Jamie Rush
Malissa Williams
Miriam Gutman
The Southern Poverty Law Center
150 E. Ponce de Leon Avenue
Suite 340
Decatur, Georgia 30030
jamie.rush@splcenter.org
malissa.williams@splcenter.org
miriam.gutman@splcenter.org

Robert Highsmith
Laura Flint
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Don and Sally Garrett
1335 Shoals Road
Sparta, Georgia 31087
sallygarrett45@yahoo.com

Blaine and Diane Smith
823 Chatsworth Drive
Accokeek, MD 20607
wbs10408@aol.com
hdianesmith@gmail.com

Grant E. McBride
Smith Welch Webb & White
2200 Keys Ferry Court
McDonogh, GA 30523
gmcbride@smithwelchlaw.com

Elizabeth L. Sanz
Renee D. Flaherty
Institute for Justice
901 N. Glebe Road
Suite 900
Arlington, Virginia 22203
bsanz@ij.org
rflaherty@ij.org

Marvin and Pat Smith
15500 Avery Road
Rockville, MD 20855
marvin.smithjr@yahoo.com
pjsmax@hotmail.com

William R. Maurer
Institute for Justice
600 University Street
Suite 1730
Seattle, WA 98101
wmaurer@ij.org

Verne Kennedy Hollis
373 Hamilton St.
Sparta, Georgia 31087
vkenn41@yahoo.com

Thomas Ahmad Lee
821 Brookriver Drive, Suite 246
Dallas, Texas 75247
tlee1827@yahoo.com

Sally G. Wells
140 Dunn Road
Sparta, Georgia 31087
sllywells@yahoo.com

Leo Briggs
Georgia Briggs
4500 Hidden Stream Drive
Loganville, Georgia 30052
lgbriggs@earthlink.net

Joel Reed
Kathy Reed
5 Dogwood Lane
Chatsworth, Georgia 30705
Jbreed48@yahoo.com

Herus Ellison Garrett
111 Brookwood Court
Eatonton, Georgia 31024

Donna N. Garrett
154 Lakeview Drive
Sparta, Georgia 31087
ngarrett64@yahoo.com

No Railroad in Our Community Coalition
c/o Janet P. Smith and David Mark Smith
929 Shoals Road
Sparta, Georgia 31087

Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

L. Craig Dowdy
Steven L. Jones
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenglish.com
sjones@taylorenglish.com

This 28th day of September 2023.



L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038

Counsel for Petitioner Sandersville Railroad Company

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

REBUTTAL TESTIMONY OF BENJAMIN J. TARBUTTON, III

September 28, 2023

L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

Robert S. Highsmith Jr.
Georgia Bar No. 352777
Laura E. Flint
Georgia Bar No. 635203
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
Telephone: (404) 817-8500
Facsimile: (404) 881-0470
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Benjamin ("Ben") J. Tarbutton, III, I am President of the Sandersville Railroad Company (the "Railroad" or "Sandersville Railroad"). My business address is 206 North Smith Street, P.O. Box 269, Sandersville, Georgia 31082.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

A. Yes, I testified on behalf of Sandersville Railroad Company in the Company's direct case, via written direct testimony pre-filed on July 21, 2023.

Q. DO YOU HAVE ANY CORRECTIONS OR CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED ON JULY 26, 2023, OR CLARIFICATIONS REGARDING THE AMENDED PETITION APPROVAL TO ACQUIRE REAL ESTATE BY CONDEMNATION?

A. Yes. The volume of Heidelberg traffic that the Hanson Spur would keep off the roads was estimated in the pre-filed testimony of Mr. Scott Dickson, President of Heidelberg Materials ("Heidelberg") Southeast Region, to be up to 400,000 tons per year. Previously, we had identified that volume to be 500,000 tons per year for purposes of calculating equivalent truck loads, which we estimated to be roughly 150 truck trips per day based on a 23-ton truck load. To reflect Mr. Dickson's estimate, I have provided here calculations showing the carloads required to move 400,000 tons

annually by rail and the one-way round-trip truckload equivalents.[1] Where we had expected the Hanson Spur would handle the equivalent of 150 truckloads per day, we now expect to handle the equivalent of roughly 130 trucks per day or over 30,000 trucks per year. The point is that any traffic handled by a railroad significantly reduces the number of trucks on the road.

Volume (tons)	**Worked Weeks**	**Daily Volume (tons; rounded)**	**Daily One-Way Truck Movements (rounded)**	**Annual One-Way Truck Movements (rounded)**
400,000	52	1,538	128	33,333
400,000	50	1,600	133	33,333
350,000	52	1,346	112	29,167
350,000	50	1,400	117	29,167
300,000	52	1,154	96	25,000
300,000	50	1,200	100	25,000

I also want to note that we have learned from Mr. Dickson that many of the carloads we had expected would otherwise move over the road if Sandersville Railroad did not build the Spur may not move at all out of the Hanson Quarry (the "Quarry") (they may, however, move from other Heidelberg facilities). How many of the Quarry's new shipments will move by road if we do not build the Spur will depend on market factors. Accordingly, in the table above, we have shown figures based on a

[1] Each truck delivery requires two individual truck trips—one that goes to the location with a full truckload and one that returns with an empty truckload, or vice versa (i.e., one travels to the Quarry empty and one leaves with a full truckload). My estimates of the daily and annual truck trips in the table account for both trips.

range of additional volumes from the Hanson Quarry.

Q. THERE HAS BEEN A LOT OF RESPONSIVE TESTIMONY FILED REGARDING THE PURPOSE AND USE OF THE SPUR. FOR CLARITY, WHAT IS THE PURPOSE OF THE HANSON SPUR?

A. The Hanson Spur (the "Project" or "Spur") will open a new switching track to connect the Hanson Quarry to the Camak subdivision of CSX Transportation, Inc. ("CSXT"). By providing the capacity to switch rail cars for Heidelberg Materials and other shippers between the Quarry area and CSXT's trunk line railroad, Sandersville Railroad will open new channels of trade to farmers, industries, and companies in eastern middle Georgia. The region desperately needs the economic boost. There is no such connection in eastern middle Georgia with the switching services to and from CSXT that Sandersville Railroad (the "Railroad" or "Sandersville Railroad") will provide over the Spur.

Currently, there are five (5) companies (Heidelberg Materials, Pittman Construction, Southern Chips, Revive Milling, and Veal Farms Transload) that plan to utilize the Spur to access the CSXT line. There will be facilities along the Spur at or near the Quarry that will permit loading and unloading of goods (a) directly between a rail car and a production facility, or (b) between a rail car and a truck (which is called "transloading"). Inevitably, these companies will drive economic development in Hancock County, where industry and good-paying jobs are desperately needed. And, we expect that development to attract more shippers. We

are very proud of this economic development. It is a proper accommodation of our business to provide channels of trade on our mainline and, if the Georgia Public Service Commission (the "PSC" or the "Commission") grants our petition, as amended, on the Hanson Spur.

Q. IS IT IMPORTANT TO THE STATE OF GEORGIA TO CONTINUE TO OPEN CHANNELS OF TRADE?

A. Yes, it is. Recently, the State of Georgia has focused on ensuring our infrastructure and logistics channels are keeping pace with the growing economy and population in the State of Georgia and southeastern United States. As a result of the commitment of our Governor, the General Assembly, and local jurisdictions to ensure the continued success and growth of Georgia, our state has been extremely fortunate to see tremendous population and economic growth.

In 2019, the Georgia Commission on Freight and Logistics (the "F&L Commission"), created by 2019-2020 House Resolution 37,[2] submitted its report (the "F&L Report").[3] The F&L Commission was created by the Georgia General Assembly "to study the freight and logistics network in the state, find ways to move freight more efficiently, and to spur economic growth and job creation."[4] The F&L Commission included, among other members, now-Lt. Governor Burt Jones, Senators

[2] 2019-2020 House Resolution 37.
[3] Rep. Kevin Tanner and Sen. Brandon Beach, *et al.*, Georgia Commission on Freight & Logistics, *Report Submitted pursuant to 2019 House Resolution 37, available at: https://www.house.ga.gov/Documents/CommitteeDocuments/2019/Freight_and_Logistics/Final_Report_Freight_and_Logistics.pdf* (last accessed September 26, 2023).
[4] *Id.* at 3.

Brandon Beach, and Steve Gooch, Representatives Kevin Tanner, Calvin Smyre, and Dale Rutledge.[5]

After touring the state and studying the prevailing transportation and logistics issues, the F&L Commission emphasized that the rise in e-commerce, Georgia's prosperous economy, business friendly environment, and growing population necessitate the need for a plan regarding freight and logistics.[6] The F&L Report noted that many issues face the trucking industry in Georgia, including driver shortages, hours of service rules, driver detention, and infrastructure and congestion issues.[7]

The F&L Report noted that "[r]ail moves freight efficiently and saves the shipper money. By putting tonnage on rail there is also the added benefit [to the public] of less congestion, reduced emissions, and reduced wear and tear on the pavement."[8] The report also recognized that short line railroads "move freight in and through rural parts of the state, provide connection to the longer lines, and bring economic benefits to the counties through which they run."[9] The F&L Commission "urged" the General Assembly of Georgia "to consider the passage of a bill that provides for budget line items specifically for freight rail appropriations [and] . . . to find ways to increase investment in the freight rail network in order to diminish truck congestion on our highways."[10]

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[5] *Id.* at 2.
[6] *Id.* at 4.
[7] *Id.*
[8] *Id.* at 5-6.
[9] *Id.* at 6
[10] *Id.* at 8.

The F&L Commission was extended, 2019-2020 HR 935,[11] and issued another report (the "2020 F&L Report") in 2020.[12] The 2020 F&L Report noted that "[r]ail infrastructure improvement is essential for economic growth in both rural and urban areas of Georgia."[13] Its recommendations regarding Georgia's railroad networks include:

(1) "[d]oubl[ing] the amount of freight currently being carried on rail from 17 to 35 percent;"[14] and

(2) legislative exploration of ways to devote public funds to all forms of transportation infrastructure.[15]

Also in the 2020 F&L Report was the "Freight and Logistics Subcommittee Report: Funding Georgia's Infrastructure Future,"[16] which "focused on the compelling need for accelerating freight and logistics infrastructure throughout the State."[17]

Q. IS THE ECONOMIC FEASIBILITY OF THE HANSON SPUR PERTINENT TO THE GEORGIA PUBLIC SERVICE COMMISSION'S DECISION HERE?

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[11] 2019-2020 House Resolution 935.
[12] Rep. Kevin Tanner and Sen. Brandon Beach, *et al.*, Georgia Commission on Freight & Logistics, *Report Submitted pursuant to 2020 House Resolution 935, available at: https://www.house.ga.gov/Documents/CommitteeDocuments/2020/Freight_and_Logistics/Georgia_Freight_and_Logistics_Final_Report_2020.pdf* (last accessed September 26, 2023).
[13] *Id.* at 5.
[14] *Id.* at 6.
[15] *Id.* at 7.
[16] *Id.* at 9, *et seq*.
[17] *Id.* at 10.

A. To the extent that is a legal question; I will leave the legal answers to counsel. As a practical matter, however, I suppose it depends on what one means by feasibility.

Hypothetically, if there were a genuine question as to whether a project could possibly serve a public purpose because it manifestly could not attract financing or could not be operated if built, then one might wonder why the Commission would consider awarding condemnation authority. However, it is my understanding the Commission historically has not engaged in such an inquiry.

In our case, however, those are not meaningful questions. My family, which owns the Sandersville Railroad, plans to contribute all the capital to Sandersville Railroad to finance the construction of the Hanson Spur. We will not require outside investment. As shown by the numerous customers that have committed to using the Hanson Spur and have chosen to testify in this docket in support of the Hanson Spur, there is also no genuine question that there is a market to sustain the public purposes that will be met by the Spur. Otherwise, we would not have done the extraordinary amount of work we have done to date.

Q. HAVE YOU REVIEWED THE TESTIMONY OF MR. GARY HUNTER FILED IN THIS PROCEEDING?

A. Yes.

Q. DO YOU UNDERSTAND THAT SANDERSVILLE RAILROAD, BY COUNSEL, INTENDS TO OBJECT TO MR. HUNTER'S TESTIMONY ON THE GROUNDS IT IS FOUNDED ON ERRONEOUS LEGAL OPINIONS, CONTAINS ULTIMATE LEGAL CONCLUSIONS THAT ARE ERRONEOUS BECAUSE THEY ARE BASED ON THOSE FALSE OPINIONS AND ON FACTS NOT IN EVIDENCE, AND THAT THE QUESTION OF THE FEASIBILITY OF THE HANSON SPUR PROJECT IS IRRELEVANT TO WHETHER THE PROJECT WILL SERVE AND CONSTITUTE A PUBLIC USE UNDER GEORGIA LAW?

A. Yes.

Q. DO YOU RECALL THAT MR. HUNTER ASSERTS THAT THE PROJECT IS NOT ECONOMICALLY FEASIBLE?

A. Yes.

Q. WHAT IS YOUR PERSPECTIVE ON HIS ASSERTIONS?

A. Mr. Hunter is a forensic consultant. To my knowledge, he has no direct knowledge of the Sandersville Railroad, our customers, the markets our shippers serve, or the eastern middle Georgia region or its economy. His speculative opinions have nothing to do with the real-world circumstances of our Project, with one likely-unintended exception: he demonstrates the ability of our Project to serve public purposes.

If this Commission grants Sandersville Railroad condemnation authority, and we satisfy the other prerequisites to construction, we will build and operate the Hanson Spur. We have worked to develop new customers. We have worked with those customers, and especially Pittman Construction and Heidelberg, to identify ways they can improve their business by using the Spur. We have worked with Heidelberg Materials to reduce the noise and other impacts of the existing Hanson Quarry and minimize those same impacts from rail operations. To that end, Sandersville Railroad and Heidelberg will build berms and relocate quarry operations.

In addition, at the request of some of the Respondents, Sandersville Railroad realigned the original plan for the Spur to reduce community impacts while protecting the regions' water resources and wetlands. We have secured the required environmental and Georgia Department of Transportation ("GDOT") permits to cross Highway 16. We have conducted all required engineering studies. And, we have worked with Heidelberg, other potential shippers, and CSXT to assure the Spur will provide a win-win, privately-financed, economic, and environmentally sensitive development opportunity for our business, CSXT, our customers, and Sparta, Hancock County, and the surrounding region.

Q. HAS MR. HUNTER'S TESTIMONY AFFECTED YOUR INVESTMENT DECISION?

A. Yes. He has reinforced our judgement that investing in this Project is necessary and the best way to accommodate and grow our company's business. Our

business is rail transportation, and the Spur is necessary for the proper accommodation of our business.

This may seem like a surprising conclusion. After all, Mr. Hunter's testimony is intended to create the opposite impression and he has based his testimony on several false assumptions. For example, he exaggerates the Project's costs and minimizes its reasonably expected revenues. Even so, his testimony shows that the Project is sufficiently economically viable to eliminate any concerns that Sandersville Railroad cannot provide channels of trade and a sustainable service to the shipping public, spur economic development, and take trucks off the road.[18]

The Hanson Spur can operate just on the volumes Mr. Hunter expects to move over the Spur, before considering any added revenues from other customers using the Spur. This means that, regardless of whether Sandersville Railroad ever makes an adequate return on its investment, the public interest in increased commerce and channels of trade and economic development will be served. And if our other potential customers can pay rates above the variable costs of adding their traffic to our Heidelberg trains, they will be better off than using trucks or an independent transload with CSXT and so will we.

[18] Mr. Hunter seems to think that adding trucks to the road to facilitate a transload at Sparta is a good thing, which I cannot understand, when he seems otherwise dismissive of reducing truck traffic. He also seems to think that, by providing new market opportunities for Southern Chips, Revive Milling, and Veal Farms, we will be adding substantial new truck volumes. But, they are not substantial volumes. Train carloads will increase by a few a week and these customers' limited truck traffic will not move through Sparta, but primarily through low density areas to reach the Quarry.

Q. CAN YOU EXPLAIN HOW YOU REACHED THAT CONCLUSION?

A. Yes. My conclusion is based on the well-known economics of railroads. Railroads have a higher proportion of fixed costs than most industries. These are the capital costs that Mr. Hunter mentions—such as the costs of rights of way, of surveying and excavating rights of way, of designing, engineering, and constructing track structure, ties, rails, and things like road crossings, signals, and culverts. Once these capital investments are made, they are largely sunk, meaning they are the same whether the line carries lots of traffic or minimal traffic and cannot be recovered practicably except through earnings from railroad revenues. Once those costs are sunk, the railroad can run a long time without recovering an adequate return on the original capital investment.

Variable costs are a different category of expense. The variable costs of moving the traffic include fuel, labor, and maintenance. If these are covered by revenues, the Railroad will operate until it needs more capital. The Railroad has the ability to provide that capital, if and when it is needed. Therefore, if Mr. Hunter is correct and our only customer ends up being Heidelberg, the Hanson Spur will stay in service if Heidelberg wants to pay any amount over the variable cost of our service. Sandersville Railroad, however, expects to attract other customers, including those who have testified that they will use the Spur in this docket. Additionally, Sandersville Railroad expects to attract sufficient revenues above variable cost from Heidelberg and other shippers to reward our investment and add to the economic health of the region.

Mr. Hunter's conclusions about Sandersville Railroad's operating costs are

based on (1) Class I railroad costs, which are much higher than Sandersville Railroad's true operating costs, and (2) his attribution of capital costs to the Project that will not be incurred. However, his assessment that we will earn rates that will cover variable costs and contribute to capital illustrates this basic principle of railroad economics: even if Sandersville Railroad is wrong about the capital requirements to construct the Project, the Hanson Spur can still be kept in operation for the foreseeable future because it can cover its variable costs.

Most important, Mr. Hunter's testimony shows that if we:

(1) carry only Heidelberg's traffic,

(2) assume our costs are as high as those of a Class I railroad, and

(3) charge rates that he says are comparable to the costs of a transload operation,

we can still cover variable costs and make an annual contribution to capital of $180,294 in 2024 up to $379,852 in 2043. The switching service will provide a return on capital into the foreseeable future, even if we get no additional traffic.

So, if Mr. Hunter is concerned that our Project will never provide the benefits we expect, he need not worry. His own testimony shows that the Hanson Spur will deliver its promised benefits. In the worst-case scenario, Sandersville Railroad might not recover its investment for years, but it will cover more than its variable cost. As a result, it will be able to serve its customers and community effectively. In that sense of the word, the Project is categorically "feasible".

Q. DO YOU THINK THE COMMISSION SHOULD EXPECT THIS PESSIMISTIC SCENARIO?

A. No. The Commission can be certain that, from the perspective of the public interest, the pessimistic scenario Mr. Hunter misguidedly forecasts would be sustainable for a long time. We expect a much more positive outcome, however, as the testimony of numerous customers in support of the Project demonstrates. Otherwise, we would not be investing in the Project. In the more likely scenario, which includes corrected and additional facts to those offered by Mr. Hunter, we will be well on our way to recovering our capital just based on the following, which we think are the more likely results:

(1) Sandersville Railroad's capital costs will be lower than he projects.

(2) Sandersville Railroad's operating costs will be lower than the Class I railroad costs he uses in his calculations.

(3) Sandersville Railroad's rates to Hanson will be higher than Mr. Hunter projects.

(4) Contrary to Mr. Hunter's assertion, Heidelberg's capital requirements will be lower than the costs its neighboring competitor, Vulcan Materials ("Vulcan"), has incurred already. Unlike Vulcan, Heidelberg will not need unit train operations that require the formation of 100 car trains. Sandersville Railroad will run small daily trains. This will allow CSXT to add Hanson's cars to its trains already carrying Vulcan's cars and therefore lower CSXT's overall per car costs for both shippers.

(5) Mr. Hunter's notion, that we would hold Heidelberg's cars to build a single weekly train[19] is out of step with modern railroad best practices. This is often called "Precision Scheduled Railroading" or "PSR", which requires services that optimize efficiency throughout the supply chain. Here, for example, by running daily trains, we can more efficiently meet Heidelberg's and CSXT's requirements, provide better service, and avoid some of the large expenditures.

(6) Because other shippers will bear the capital costs of any special facilities they may require to use our switching services, our variable costs of serving those shippers, over and above the cost of serving our baseload traffic, will be low.

(7) As shown in my table below, we expect Sandersville Railroad's capital costs will be roughly 26% lower than Mr. Hunter's projection.

Q. HOW DID YOU REACH YOUR CONCLUSION REGARDING CAPITAL COSTS?

A. Mr. Hunter's estimated capital cost projects are far higher than ours for two principal reasons: (1) he includes costs that we will not be incurring, and (2) he grossly overstates the costs we expect to incur. He expects our capital costs to be

[19] S*ee* Pre-filed Responsive Expert Testimony of Gary Hunter, *In re: Sandersville Railroad Company's Petition for Approval to Acquire Real Estate by Condemnation*, Docket 45045, Document 205550 (August 25, 2023) ("Testimony of Gary Hunter") at 14:19-23.

$20,627,082.00.[20] We expect them not to exceed roughly $15.2 million.[21] The table below shows Mr. Hunter's estimates compared to our estimates. Our estimates are based on our experience and that of our local engineering advisors.

Mr. Hunter's Cost Component	**Mr. Hunter's Cost Estimate**		**Sandersville Railroad's Cost Component**	**Sandersville Railroad's Cost Estimate**
Main Line Track 4.5 miles	$ 11,049,280.00		Land Acquisition	$ 327,000.00
Highway 16 Crossing	$ 2,000,000.00		Wetland Credits	$ 1,500,000.00
CSXT Interchange Tracks	$ 3,610,000.00		Erosion Control	$ 200,000.00
Two Rail Bridges	$ 214,000.00		Drainage	$ 200,000.00
At-Grade Crossings	$ 231,441.00		Culverts and Bridges	$ 2,200,000.00
Train Building Yard	$ 2,953,800.00		Grading and Subsurface Construction	$ 4,500,000.00
Land Acquisition	$ 568,561.00		At-Grade Crossings	$ 600,000.00
			Above Surface Construction 4.5 miles	$ 4,752,000.00
			Sidetrack construction	$ 250,000.00
			CSXT Connection	$ 650,000.00
Total Estimated Capital Costs:	$ 20,627,082		**Total Estimated Capital Costs:**	$ 15,179,000

Q. WHY DO YOU EXCLUDE THE TRAIN FORMATION COSTS ATTRIBUTED TO THE PROJECT BY MR. HUNTER?

A. We exclude them because, as I noted above, they need not be incurred. First, as I explained, Heidelberg will not need a train building yard to accommodate unit trains because we will be running daily train service. Second, we will instead build

[20] *Id.* at Ex. 34, p. 29.

[21] Mr. Hunter suggests we claimed our capital costs would be $7.4 million. *Id.* at 9:16-18. Sandersville Railroad has no idea where that number came from.

an extra siding—approximately 1,000 feet long to accommodate our limited switching requirements for Heidelberg and Pittman Construction and transload operations for other shippers.

Q. WHY DO YOU EXCLUDE THE COSTS ATTRIBUTED TO THE PROJECT BY MR. HUNTER THAT WILL BE INCURRED BY SHIPPERS?

A. Those costs are not included in our Project. They will be incurred by our shippers to benefit their business.

Q. MR. HUNTER ASSERTS THAT TRANSLOADING TO CSXT IS A BETTER TRANSPORTATION OPTION FOR HEIDELBERG THAN THE HANSON SPUR; DO YOU AGREE?

A. No. This is another of Mr. Hunter's theoretical notions that are based on assumptions inconsistent with my real-world understanding. Let me explain. Our arrangements with Heidelberg are that we will provide an interim-only transloading facility to CSXT to permit Heidelberg to begin developing its new capacity. However, we understand that Heidelberg's long-term plans are contingent on realizing the benefit of all-rail rather than transload service. This includes its plans to maximize the efficiency of the Quarry, construct berms to reduce the noise impact of its operations on nearby residents, move its crushing mill further away from nearby residents, and realize the environmental benefits of rail service.

Mr. Hunter identifies end-to-end train service as a competitive advantage that

Vulcan has now. He ignores the fact that Heidelberg would enjoy the same advantage if the Spur is built. Also, he may not be aware that Heidelberg is trying its hardest to reduce its environmental impact as much as possible while staying in the market. Heidelberg knows that an all-rail service is the best way to do that.

By contrast, if this Commission denies our opportunity to build the Hanson Spur, Heidelberg would be unlikely to make as many expenditures as possible to increase efficiencies and reduce environmental impacts. It would choose instead to truck as much of its product as could be marketed using that more expensive mode of transportation, leading to thousands of trucks moving over the roads next to the Respondents', Intervenors', and others' local residential properties.

Q. CAN PITTMAN CONSTRUCTION'S REQUIREMENTS BE MET BY TRANSLOADING FROM CSXT AT SPARTA?

A. No, Pittman Construction will be moving tank cars of liquid asphalt to the Quarry, where it will heat those cars to liquify the petroleum for unloading and mixing with materials from the Quarry to form asphalt for roadbuilding.

Heating the material is necessary to load or unload it and is expensive and cumbersome. Those tanks cars—roughly two per week—are now shipped by rail from a refinery to Lithonia, GA. There, the material is heated in order to be unloaded and transloaded to trucks. Once the trucks arrive at the Quarry, they must in turn be heated to be unloaded.

The Spur would eliminate the intermediate step of heating and transloading

from rail to trucks at Lithonia. The liquid asphalt could travel all the way from the refinery by rail. Contrary to Mr. Hunter's assertion, it would make no sense—due to space constraints and the need for capital and operating expenditure—for Pittman to add yet another heating and transloading facility at Sparta as opposed to continue its current practice if the Spur were not built.

Q. MR. HUNTER ARGUES THAT, RATHER THAN UTILIZING THE HANSON SPUR, VEAL FARMS TRANSLOAD, REVIVE MILLING, AND SOUTHERN CHIPS COULD JUST AS EASILY SEND THEIR PRODUCTS TO SPARTA FOR TRANSLOADING TO CSXT AND THAT SHIPPING BY TRUCK FROM SANDERSVILLE TO THE HANSON QUARRY WILL ADD MORE, NOT FEWER, TRUCKS TO THE ROAD. HOW DO YOU RESPOND?

A. Mr. Hunter is correct that trucking from the Sandersville area to either CSXT or Sandersville Railroad will add a few more trucks to the road. Veal Farms, for example, is likely to move a few rail cars per week over the Spur to CSXT and it will require roughly 4-5 trucks per rail car to move that traffic to the transload facility near the Quarry, well south of Sparta. However, those trucks would not travel through the area between the Quarry and Sparta, which is more densely populated than the area between Sandersville and Sparta.

Contrary to Mr. Hunter's suggestion, if Sandersville Railroad does not build the Hanson Spur, we do not expect much of that new traffic from Veal Farms, for example, to move by rail. The poor economics of transloading would reduce the access

to new markets that these shippers are seeking.

Conversely, transloading at the Quarry will have several advantages for Veal Farms Transload and others that hope to ship over the Spur and CSXT. The Spur will allow their traffic to be handled on the daily trains destined to and from CSXT from the Quarry in the most efficient manner possible. That would minimize the cost of service for CSXT and these shippers and increase their opportunities for new markets.

Q. DO YOU BELIEVE MR. HUNTER IS GENUINELY CONCERNED THAT OUR PROJECT WILL NEVER PROVIDE THE BENEFITS SANDERSVILLE RAILROAD EXPECTS FROM THE PROJECT?

A. No, I believe he is telling a speculative story to support the Institute for Justice's transparent efforts to change federal and state constitutional law regarding condemnation. If he were genuinely concerned, he would have recognized that his own testimony shows there is no reason to worry. The Hanson Spur will deliver its promised public benefits.

Q. WHAT DO THINK ABOUT MR. HUNTER'S CONCERN THAT YOU WILL NOT ATTRACT THE NECESSARY CAPITAL TO FUND THE PROJECT?

A. As Mr. Hunter makes clear, that concern is speculative. In his testimony he states that, "[a]lthough Sandersville has stated it will be financing the project itself,

. . . the project *may* require additional funding from other sources."[22] His speculation has no basis in fact. Sandersville Railroad is paying for this Project, without any "investment partners and shippers, financing from a private lender, or public funding." *Id*. at 11:22. Neither is the Sparta Hancock Development Authority providing economic support. *Id*. at 15:17-19.

Mr. Hunter makes it clear he would not want to make an investment in our project. Fortunately for the Project, Georgia commerce, and Hancock County, neither he, nor any other third party, will be needed to construct the Hanson Spur. Sandersville Railroad, which is wholly owned by members of the Tarbutton family, will fund the entire project.

Q. MR. HUNTER THINKS YOU NEED TO PROVE THE FEASIBILITY OF THE PROJECT TO SHOW THAT THE PROJECT WILL SERVE A PUBLIC USE. DO YOU AGREE?

A. That seems like a legal conclusion. However, as a layman, I do not agree with him that feasibility and public use are the same thing. Regarding public use, we have shown the Project will provide channels of trade and is necessary to properly accommodate our railroad business. As I understand Georgia law, the Georgia legislature has already decided this requirement is sufficient to meet the "public use" requirements of the Georgia Constitution. Mr. Hunter incorrectly, and without the requisite legal expertise, or any knowledge of our railroad, concludes the Project is

[22] *Supra* note 19, Testimony of Gary Hunter, at 5:5-7 (emphasis added).

not necessary for the proper accommodation of our business.[23] For all the reasons I've explained, he's wrong.

Because the Project will provide channels of trade and is necessary to properly accommodate our business, which already serves a public purpose, it has a "public use."[24]

Regarding feasibility, Sandersville Railroad plans to build the Project and I have explained why we are confident it will be a profitable venture.

Q. WHY, GIVEN THAT MR. HUNTER THINKS YOU CANNOT RECOVER YOUR INVESTMENT IN THE PROJECT, WOULD YOU GO FORWARD?

A. Fortunately, I do not have to persuade Mr. Hunter that we will recover our investment. He is being paid to raise doubts about the prospects for our Project. The only people making investment decisions for Sandersville Railroad sit on its Board of Directors. They have already been persuaded.

It does not appear that Mr. Hunter has experience developing an entrepreneurial greenfield railroad development project. That may explain why he

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[23] *Id*. at 22:1-2.

[24] One of Mr. Kochan's articles that he cited in his testimony (Donald J. Kochan, *"Public Use" and the Independent Judiciary: Condemnation in an Interest-Group Perspective*, 3 TEX. REV. L. & POL. 49 (1998)) explains that that **modern courts do not require a public use to be in actual use by the public.** Instead, public uses are understood to be broad in scope—often as uses serving public purposes, needs, or interests. As the phrase is commonly understood, the Project will be a "public use" because it will provide channels of trade as well as benefits to Hancock County's and eastern middle Georgia's citizens and local businesses.

seems to think "feasibility" for railroad construction should only occur if his hypothetical investors in a project like ours would be guaranteed what he believes to be a reasonable return on their investment. Satisfaction of hypothetical investors based on Mr. Hunter's litmus test of a reasonable return is not required, and that is not what's going on here.

My family has been operating Sandersville Railroad as a private, for-profit enterprise for 130 years. We are a consistently profitable company and have been for decades. Our satisfied customers are the proof that we conduct our business successfully.

We are making this investment based on our judgment, informed by our experience operating in east middle Georgia for all these years, that the Hanson Spur will also be profitable. We made our decision based on:

(1) Our past experience;

(2) Our assessment of whether the service will attract and keep satisfied customers over the long run; and

(3) A multi-year process of assessing the costs of building and operating the Spur according to the highest possible environmental standards.

Like all plans, this is admittedly somewhat speculative. Unknown, unforeseen factors can disrupt the best projections. But our informed speculation is of the same sort that built most railroads in this country, except we have the added benefit of state of the art engineering, surveying, and railroad technology. The history of successful railroading, including Sandersville Railroad's success, demonstrates

conclusively that Mr. Hunter's assertion that "[r]ail is not a 'build it and they will come' industry"[25] is simply wrong.

Q. GIVEN THAT SANDERSVILLE RAILROAD WILL RISK A LOT OF CAPITAL, SHOULD THE PUBLIC BE WORRIED THAT THEY WILL SHARE THAT RISK?

A. No. Sandersville Railroad is taking all the downside risk. As even Mr. Hunter has shown, the Commission can reasonably expect that the public will get the projected benefits of the Project whether or not our investment pays off for the Sandersville Railroad. This is because we can continue to compete with trucks for the foreseeable future by charging rates that, by Mr. Hunter's analysis, cover more than our variable costs of service.

Sandersville Railroad's incentives and Hancock County's incentives are aligned. We have every incentive to work hard to develop new business for Hancock County. As we have in Sandersville and Washington County for over a century, in Hancock County, we will develop economic opportunities for ourselves, our customers, and the communities we serve, thereby ensuring the long-term success of the Hanson Spur.

[25] *Id.* at 12:3.

Q. MR. HUNTER SEEMS TO THINK THAT CSXT MAY PRESENT AN OBSTACLE TO THE COMPLETION OF THE HANSON SPUR. IS THAT CONSISTENT WITH YOUR UNDERSTANDING?

A. No. CSXT supports the project. They have been working closely with us in developing our Project.

Q. WHAT IS THE ROLE OF THE SPUR AND SANDERSVILLE RAILROAD'S SWITCHING SERVICES IN THE NATIONAL RAILROAD NETWORK?

A. Railroads are a regulated industry.[26] The Federal Government agency that regulates railroads, the U.S. Surface Transportation Board ("STB") has exclusive jurisdiction over transportation by rail that is part of the interstate rail network. The Hanson Spur will connect with that network via CSXT's Camak subdivision.

On the Hanson Spur, Sandersville Railroad will be operating as a private switch carrier. In this more limited scope of operation, Sandersville Railroad will offer its switch services to any shipper that wants to negotiate a contract rate on mutually satisfactory terms. By operating in this manner, Sandersville Railroad can most efficiently facilitate carriage to and from the Spur by CSXT.

Q. WHY ARE YOU EXPLAINING THIS TO THE COMMISSION?

[26] *See, e.g.,* FRANK N. WILNER, RAILROADS & ECONOMIC REGULATION (AN INSIDER'S ACCOUNT) (Simmons-Boardman Books, Inc. 2023).

A. My purpose is not to testify on the regulatory scheme, but to explain why I believe many of Mr. Hunter's assertions are erroneous. They are based on misunderstandings of the role of Sandersville Railroad's switching service over the Spur. In particular, he incorrectly testifies regarding:

(1) the type of rates he says we will charge;[27]

(2) the nature of our operations;[28]

(3) the amount of our costs;[29] and

(4) the notion that we will not connect with CSXT.[30]

I also want the Commission to understand that Sandersville Railroad will be serving the same public purpose—providing channels of trade over the national rail network—as CSXT, the trunk line railroad to which we will connect. Indisputably, rail transportation over the national network is regarded as a public use vested with the public interest. Nonetheless, Mr. Hunter and other witnesses seek to challenge the public use of the Hanson Spur.

Intervenors' witness Mr. Kochan not only ignores the role our switching services will play in the national rail network, but he also advocates an entirely different meaning of "public use" from the one his published writings recognize is now the law.[31]

Taking Mr. Hunter's and Mr. Kochan's misguided views together, I infer they

[27] *Id*. at 12:10.
[28] *Id*. at 10:20-23, 14:19-23
[29] *Id*. at 10:23-11:1, 11:2-4.
[30] *Id*. at 14:12-18.
[31] *Supra* at n. 24.

are intended not to apply the law as written. They aim instead to support an ideological crusade by the Institute for Justice to make new federal constitutional law.[32] The Commission does not have before it a constitutional amendment or statutory amendment. Instead, we are asking the Commission whether the proposed Spur serves a public purpose under the existing law.

Q. MR. HUNTER SEEMS TO THINK THE COMMISSION IS REQUIRED TO DETERMINE WHETHER THE PROJECT IS INVESTIBLE. DOES THAT MAKE SENSE TO YOU?

A. No. Mr. Hunter has not properly framed the question. As I understand it, the question is whether the Project, *if built*, would serve a public purpose. My attorneys inform me this is the authority the legislature has given to the Commission. *If the PSC decides the Project will serve a public purpose, then we will have authority to condemn property for the Project.*

Railroads in America are private enterprises operating in the public interest.

[32] Apparently, as Mr. Kochan has described in one of the articles he cites in his testimony (Donald J. Kochan, *"Public Use" and the Independent Judiciary: Condemnation in an Interest-Group Perspective*, 3 TEX. REV. L. & POL. 49 (1998)), the definition of "public use" in modern law differs from its pre-20th century definition. In a later article of his, also cited in his testimony (Donald J. Kochan, *The ~~[Takings]~~ Keepings Clause: An Analysis of Framing Effects from Labeling Constitutional Rights*, 45 Fla. St. U. L. Rev. 1021 (2018)), Mr. Kochan, drawing upon what I understand to be a cornerstone Supreme Court Decision (*Kelo v. City of New London*, 545 U.S. 469 (2005)), recognizes that the power of eminent domain today is wide in scope and embraces the broader concept of "public purpose." This seems contrary to the limited "use by the public test" Mr. Kochan insists ought to be used by the Commission here. From my perspective, he is advocating a new constitutional interpretation.

Whether the Project will be developed and whether the property will in fact be condemned will be up to the business judgement of the parties financing the Project. In this case, it will be my family. We will take the risk. And, Mr. Hunter has shown that, if we go forward, the Project can serve its public purpose whether we make a good return on our investment or not. Our private investment decisions have nothing to do with the indisputable public purpose of the Hanson Spur.

Q. ARE THERE ANY OTHER ELEMENTS OF MR. HUNTER'S TESTIMONY TO WHICH YOU WOULD LIKE TO RESPOND?

A. Yes. Mr. Hunter makes many assumptions and assertions that have no factual relationship to our Project. I do not need to address all these assumptions and assertions. What matters is that they are not relevant to the Commission's determination of the Project's public use. The financial risks of the Project are being assumed by the Tarbutton family, the owners of the Sandersville Railroad. We do not plan on losing money, and Mr. Hunter has offered nothing that makes us doubt our plans. As a result, we believe the Commission can reasonably expect that, if we build the Hanson Spur, it will provide the benefits we have claimed.

There are, however, things about his testimony that seem notably far-fetched.

First, as a matter of personal privilege, I object to Mr. Hunter's prejudicial inclusion of photos in the body and exhibits of his testimony that show segments of a down-at-the-heels railroad. He says these are photos of segments of CSXT railroad. I do not know where those photos were taken, but they have nothing to do with

Sandersville Railroad. Our railroad is in excellent shape, and we will maintain the Hanson Spur in the same manner.

Second, our costs should not be conflated with Heidelberg's costs, as Mr. Hunter does in his testimony.[33] Those costs are exclusively Heidelberg's decision and based on its internal requirements.

Finally, Mr. Hunter seems to want to go back to the dark ages of hyper-regulation which led to the bankruptcy of many of the nation's largest railroads. He wants the PSC to second guess our private business decisions and whether we should be able to take a business risk that will benefit the public whether or not we succeed. I understand from counsel there is no legal basis for this notion under Georgia law. As a matter of policy, I hope the Commission will not go down that path. Doing so would likely assure no new railroads will ever again be built in Georgia with private capital, and, as Georgia's legislature has recognized, railroads and particularly short line railroads are vital to the states continued prosperity and growth.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

[33] Testimony of Gary Hunter at 11:2-4.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **REBUTTAL TESTIMONY OF BENJAMIN J. TARBUTTON, III** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Sallie Tanner*
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Rob Trokey
Director, Electric Unit
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
rtrokey@psc.ga.gov

Nancy G. Gibson
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.ga.gov

Jamie Rush
Malissa Williams
Miriam Gutman
The Southern Poverty Law Center
150 E. Ponce de Leon Avenue
Suite 340
Decatur, Georgia 30030
jamie.rush@splcenter.org
malissa.williams@splcenter.org
miriam.gutman@splcenter.org

Robert Highsmith
Laura Flint
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Don and Sally Garrett
1335 Shoals Road
Sparta, Georgia 31087
sallygarrett45@yahoo.com

Blaine and Diane Smith
823 Chatsworth Drive
Accokeek, MD 20607
wbs10408@aol.com
hdianesmith@gmail.com

Grant E. McBride
Smith Welch Webb & White
2200 Keys Ferry Court
McDonogh, GA 30523
gmcbride@smithwelchlaw.com

Elizabeth L. Sanz
Renee D. Flaherty
Institute for Justice
901 N. Glebe Road
Suite 900
Arlington, Virginia 22203
bsanz@ij.org
rflaherty@ij.org

Marvin and Pat Smith
15500 Avery Road
Rockville, MD 20855
marvin.smithjr@yahoo.com
pjsmax@hotmail.com

William R. Maurer
Institute for Justice
600 University Street
Suite 1730
Seattle, WA 98101
wmaurer@ij.org

Verne Kennedy Hollis
373 Hamilton St.
Sparta, Georgia 31087
vkenn41@yahoo.com

Thomas Ahmad Lee
821 Brookriver Drive, Suite 246
Dallas, Texas 75247
tlee1827@yahoo.com

Sally G. Wells
140 Dunn Road
Sparta, Georgia 31087
sllywells@yahoo.com

Leo Briggs
Georgia Briggs
4500 Hidden Stream Drive
Loganville, Georgia 30052
lgbriggs@earthlink.net

Joel Reed
Kathy Reed
5 Dogwood Lane
Chatsworth, Georgia 30705
Jbreed48@yahoo.com

Herus Ellison Garrett
111 Brookwood Court
Eatonton, Georgia 31024

Donna N. Garrett
154 Lakeview Drive
Sparta, Georgia 31087
ngarrett64@yahoo.com

No Railroad in Our Community Coalition
c/o Janet P. Smith and David Mark Smith
929 Shoals Road
Sparta, Georgia 31087

Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

L. Craig Dowdy
Steven L. Jones
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenglish.com
sjones@taylorenglish.com

This 28th day of September 2023.



L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038

Counsel for Petitioner Sandersville Railroad Company

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

REBUTTAL TESTIMONY OF SCOTT DICKSON

September 28, 2023

L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

Robert S. Highsmith Jr.
Georgia Bar No. 352777
Laura E. Flint
Georgia Bar No. 635203
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
Telephone: (404) 817-8500
Facsimile: (404) 881-0470
robert.highsmith@hklaw.com
laura.flint@hklaw.com

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Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Scott Dickson, and I am the President of Heidelberg Materials ("HM") Southeast Region. HM produces and ships cement and cementitious products, construction aggregates (i.e., crushed stone, sand, and gravel), and concrete across the Southeast Region. HM's Southeast Region covers the 5 states of Alabama, Florida, Georgia, North Carolina, and South Carolina. I am a Mechanical Engineer. I received my bachelor's degree in applied science in mechanical engineering from the University of British Columbia, in 1990, and an Executive Masters of Business Administration from Simon Fraser University in 1999. I was registered as a Professional Engineer in Canada but have since allowed that registration to lapse as, today, my job is principally focused on general management. My business address is 3237 Satellite Boulevard, Building 300, Suite 210, Duluth, Georgia 30096.

I have over 30 years of experience in the production and manufacture of heavy construction materials—namely, cement, supplemental cementitious materials, aggregates, and ready-mix concrete.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

A. Yes, I testified on behalf of Sandersville Railroad Company in the Company's direct case, via written direct testimony pre-filed on July 21, 2023.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to show why a transload facility from truck

to rail is a far less desirable long term, and likely unviable, transportation option for HM. First, there is an additional cost associated with transloading to rail. Second, transloading reduces our ability to reach markets because it adds additional logistic components: loading and unloading materials to and from trucks and the act of trucking the material itself. That is not a long-term viable option to access the markets that CSXT exclusively serves and can serve more efficiently than trucks. In order to viably reach these markets, direct rail access to the Sparta Quarry is vital.

I have reviewed the financial model we used on the Sparta rail project. We proposed to transload for one year to help seed the future markets, likely while the Hanson Spur (the "Spur") is under construction, but it was never our intention to do this on a full-time basis. Instead, we hoped to use temporary transloading to develop the markets that would be served by all-rail once the Hanson Spur was completed.

The principal point I want to make is that we cannot develop the full capacity of our Sparta Quarry or develop as many markets if we are limited to trucking. However, even without the rail connection, our business is expanding and we will be moving many more tons via local roads if the Spur is not built than if the Spur is built.

The second key point is that transloading to CSXT at Sparta is not an effective alternative for most of our long-term business that we would move over the Hanson Spur. This is because, among other things,

(1) Transloading adds extra costs that will keep us out of markets best served by all-rail transportation;

(2) Where direct rail service is not available, trucking directly is more efficient than transloading;

(3) The space available for transloading near the Camak line is not sufficient to accommodate the full volumes we could move over the Spur; and

(4) HM is heavily focused on reducing its CO2 emissions. Rail is a far more effective mode of transport versus truck when evaluating CO2 emissions.

Therefore, direct rail service over the Spur to CSXT is the only way for Sandersville Railroad to efficiently provide new channels of trade to markets best served by rail.

Without the Spur, large volumes of HM products would still be served, just less efficiently, by truck. Accordingly, if the Spur is built, it will take trucks off the road in large volumes, in addition to carrying volumes that would not move but for the Hanson Spur. With the Hanson Spur, we would be able to supply additional markets from the Hanson Quarry.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **REBUTTAL TESTIMONY OF SCOTT DICKSON** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Sallie Tanner*
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Rob Trokey
Director, Electric Unit
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
rtrokey@psc.ga.gov

Nancy G. Gibson
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.ga.gov

Jamie Rush
Malissa Williams
Miriam Gutman
The Southern Poverty Law Center
150 E. Ponce de Leon Avenue
Suite 340
Decatur, Georgia 30030
jamie.rush@splcenter.org
malissa.williams@splcenter.org
miriam.gutman@splcenter.org

Robert Highsmith
Laura Flint
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Don and Sally Garrett
1335 Shoals Road
Sparta, Georgia 31087
sallygarrett45@yahoo.com

Blaine and Diane Smith
823 Chatsworth Drive
Accokeek, MD 20607
wbs10408@aol.com
hdianesmith@gmail.com

Grant E. McBride
Smith Welch Webb & White
2200 Keys Ferry Court
McDonogh, GA 30523
gmcbride@smithwelchlaw.com

Elizabeth L. Sanz
Renee D. Flaherty
Institute for Justice
901 N. Glebe Road
Suite 900
Arlington, Virginia 22203
bsanz@ij.org
rflaherty@ij.org

Marvin and Pat Smith
15500 Avery Road
Rockville, MD 20855
marvin.smithjr@yahoo.com
pjsmax@hotmail.com

William R. Maurer
Institute for Justice
600 University Street
Suite 1730
Seattle, WA 98101
wmaurer@ij.org

Verne Kennedy Hollis
373 Hamilton St.
Sparta, Georgia 31087
vkenn41@yahoo.com

Thomas Ahmad Lee
821 Brookriver Drive, Suite 246
Dallas, Texas 75247
tlee1827@yahoo.com

Sally G. Wells
140 Dunn Road
Sparta, Georgia 31087
sllywells@yahoo.com

Leo Briggs
Georgia Briggs
4500 Hidden Stream Drive
Loganville, Georgia 30052
lgbriggs@earthlink.net

Joel Reed
Kathy Reed
5 Dogwood Lane
Chatsworth, Georgia 30705
Jbreed48@yahoo.com

Herus Ellison Garrett
111 Brookwood Court
Eatonton, Georgia 31024

Donna N. Garrett
154 Lakeview Drive
Sparta, Georgia 31087
ngarrett64@yahoo.com

No Railroad in Our Community Coalition
c/o Janet P. Smith and David Mark Smith
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Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

L. Craig Dowdy
Steven L. Jones
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenglish.com
sjones@taylorenglish.com

This 28th day of September 2023.



L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038

Counsel for Petitioner Sandersville Railroad Company

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

EXHIBIT
SRR 50

EXHIBIT 3

Feasibility Study

New Railroad Sparta, GA, 4.5 Miles





August 14, 2023

Prepared By:

Railroad Industries Incorporated

Full Service Transportation Consulting

8098 Anselmo Ct. Reno, NV 89523
Reno, NV 775-825-6570

www.railroadindustries.com

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Executive Summary

This report analyzes the feasibility of a proposed new railroad that could be located near Sparta, GA. As with all railroad projects, it will require substantial capital investment and as with any business venture, the feasibility must be determined to ensure the project is worth the investment.

The project in this study is construction of a new short line railroad located just outside of Sparta, GA. The new railroad would interchange with CSX Railroad on the Camak Subdivision/Branch line. Currently, Vulcan Materials' quarry located 1.5 miles east of Sparta, is the last customer on this branch line. The new railroad would become the last customer by connecting on the west side of the Vulcan quarry. The line would then extend generally southward for about 3.5 miles to the Heidelberg/Hanson Quarry, which would be the main customer to be served. Then the line would cross Shoals Rd., run along the back side of Maggie Reynolds Rd. and terminate along Old Galilee Rd. for another mile, totaling 4.5 miles on the new line.

In order to construct the new line, the right of way land for the 4.5 miles would need to be acquired. The route that SRC has chosen requires acquisition of right of way over 19 properties. Nine of the property owners are opposed to selling their land or having a railroad bisect their properties at all. No other alternatives or alignments were presented or tested for feasibility as far as we know at this point. SRC has elected to begin condemnation proceedings against the nine property owners for this right of way.

Numerous Testimonies have been submitted asserting the need for this new railroad, but when any of the traffic, costs or details are examined, many of the assertions are simply ideas and hopes. Aside from one customer, Heidelberg Aggregates, there has been no analysis to back up costs, traffic numbers or an operating plan for this railroad. There appears to be a clever spin of the language to imply need and economic development impact, although railroads do not hold authority to condemn property in Georgia for economic development purposes.

The overall result of this Feasibility Study, based on extremely limited data provided or developed so far, is that the project is not feasible.

Essentially, the project owners estimated the capital costs at only $7.4 million, when they are actually over $19 ~~20~~ million. This does not even count an additional $6.2 million for Heidelberg infrastructure in its facility for the project to work.

The project owner did not account for numerous extremely sensitive items that would be required, including connecting interchange tracks, highway roadway crossings/bridges and support tracks.

Cost Component	Cost
Main Line track 4.5 miles	$ 11,049,280.00
Highway 16 Crossing	$ 2,000,000.00
CSX Interchange Tracks	$ 3,610,000.00
Two Rail Bridges	$ 214,000.00
At-Grade Crossings	$ 231,441.00
Train Building Yard	$ 2,953,800.00
Land Acquisition	$ 568,561.00
Total Estimated Capital Costs:	**$ 20,627,082.00**

Most of the traffic and customers presented for this line have no way of shipping direct rail on the line. The only customer with traffic developed enough to responsibly count toward the feasibility of this line is Heidelberg with 400,000 tons annually. ~~Based on a single weekly unit trains as presented by the project owner, this equates to a 67-car unit train each week. No other traffic is viable or developed enough to count.~~

Based on this traffic and the maximum rates the new railroad would be able to charge, it can in no way recuperate the capital costs of this project. Analysis showed that even after 20 years, the project would not be half way paid for.

SRC Sparta Operation Projection	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028	Year 2044
PROJECTED CARLOADS:	3484	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06	$ 271.70
OPERATING REVENUES						
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398	$ 946,600
OPERATING EXPENSES						
MAINTENANCE OF WAY	$ 36,000	$ 37,440	$ 38,938	$ 40,495	$ 42,115	$ 78,880
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794	$ 87,645
TRANSPORTATION	$ 138,222	$ 143,751	$ 149,501	$ 155,481	$ 161,700	$ 302,861
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870	$ 82,167
OPERATING EXPENSES BEFORE D & A	$ 251,722	$ 261,791	$ 272,263	$ 283,153	$ 294,479	$ 551,554
EBITDA	$ 180,294	$ 187,506	$ 195,006	$ 202,806	$ 210,918	$ 395,046
OPERATING MARGIN	42%	42%	42%	42%	42%	42%
OPERATING RATIO	58.3%	58.3%	58.3%	58.3%	58.3%	58.3%
COST PER CAR	72.25	75.14	78.15	81.27	84.52	158.31
COST PER TON	$ 0.63	$ 0.66	$ 0.69	$ 0.71	$ 0.74	$ 1.39
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27	$ 2.38

The transload option was developed to show for $1.5 million less in capital costs to Heidelberg, it can ship its aggregate cheaper on a CSX Direct transload.

Mode(s)	Truck/ Transload Cost	Railroad 1 Cost	Railroad 2 Cost	Total Rate per ton
Truck entire route	$ 24.88			$ 24.88
Direct Rail using New RR + CSX charging maximum to recuperate capital costs		$ 1.09	$ 9.59	$ 10.68
Truck to Transload+CSX Direct	$ 1.09		$ 9.59	$ 10.68

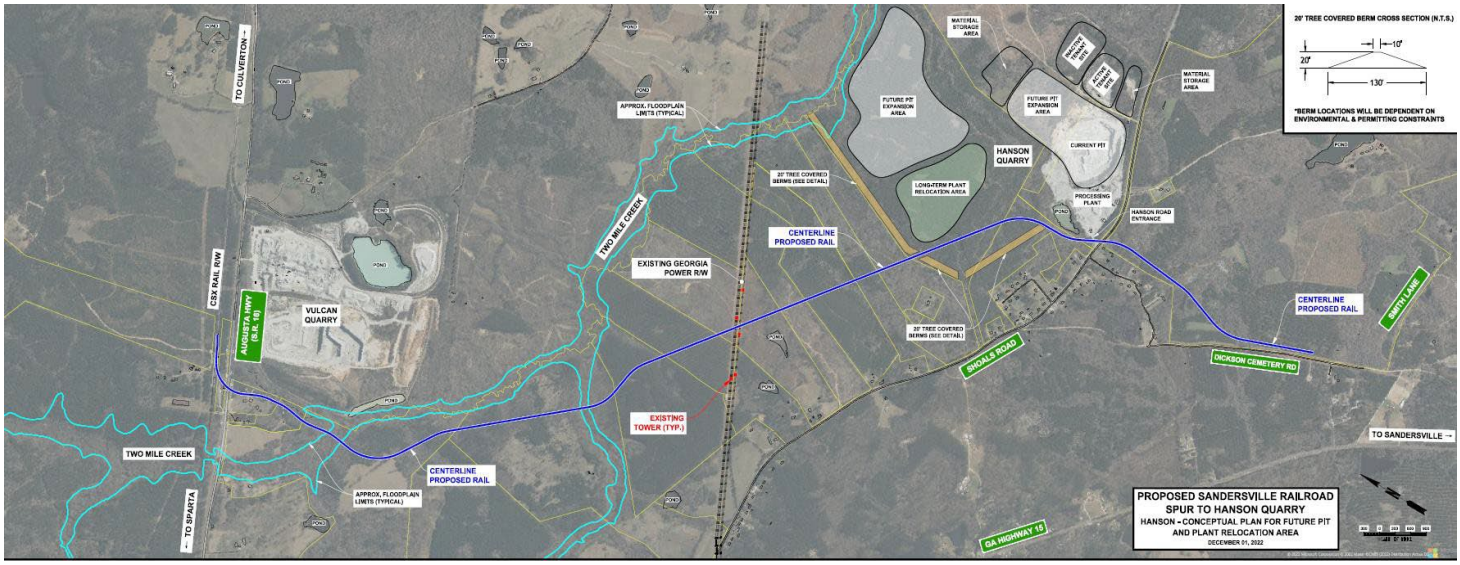
Essentially, this project has not been developed far enough to spend any capital or engage in any adverse actions. Until such analysis has been done, it is only a wish. The project as presented is not feasible and there are several alternatives that maintain the public need aspect assumed by the project.

Introduction

This report analyzes the feasibility of a proposed new railroad that could be located near Sparta, GA. As with all railroad projects, it will require substantial capital investment and as with any business venture, the feasibility must be determined to ensure the project is worth the investment.

Background

The project in this study is construction of a new short line railroad located just outside of Sparta, GA. The new railroad would interchange with CSX Railroad on the Camak Subdivision/Branch line. Currently, Vulcan Materials' quarry located 1.5 miles east of Sparta, is the last customer on this branch line. The new railroad would become the last customer by connecting on the west side of the Vulcan quarry. The line would then extend generally southward for about 3.5 miles to the Heidelberg/Hanson Quarry, which would be the main customer to be served. Then the line would cross Shoals Rd., run along the back side of Maggie Reynolds Rd. and terminate along Old Galilee Rd. for another mile, totaling 4.5 miles on the new line.



The Sandersville Railroad Company (SRC) is the railroad planning to construct and operate the new line. SRC currently owns and operates a short line railroad located in Sandersville, GA, about 20 miles south of Sparta. SRC serves numerous customers on 10 miles of mainline track plus 25 miles of support tracks within a 5 mile radius of the city center of Sandersville, interchanging with Norfolk Southern Railway (NS) at Tennille, GA.

SRC estimates the capital costs for constructing the new railroad would be $7.4 million. SRC would obtain operating authority from the U.S. Surface Transportation Board (STB) and operate as a Rule 11 railroad interchanging with CSX. Therefore, it is important to identify this track as a new short line railroad, not an industrial rail spur, which would be a track branching off an existing railroad. For this to be an industrial rail spur, CSX would need to be the party constructing the track. No information has been provided to date regarding CSX's involvement or position on this project. As far as we know at this time, CSX, who would be the connecting Class I carrier, is not a party to this new project and has had no dealings with Heidelberg or any other customers who could possibly use the new railroad. SRC currently operates no track connected to this proposed new railroad. If completed, the closest point on the new railroad would be separated from the closest point on the existing SRC by approximately 15 miles.

The main purpose of the new railroad would be to connect the Heidelberg Quarry to the CSX Branch line. The quarry sits about 3 miles off the CSX line and does not have direct rail access at this time. Heidelberg currently sells 250,000-350,000 tons of aggregates annually to local markets served by trucks. It asserts that it has the capacity to produce up to 700,000 tons of aggregate annually if it could reach other markets available by rail. Heidelberg has said that it will spend an additional $6 million in capital costs within its own facility to support the railroad operations if this project proceeds.

In order to construct the new line, the right of way land for the 4.5 miles would need to be acquired. The route that SRC has chosen requires acquisition of right of way over 19 properties. Nine of the property owners are opposed to selling their land or having a railroad bisect their properties at all. No other alternatives or alignments were presented or tested for feasibility as far as we know at this point. SRC has elected to begin condemnation proceedings against the nine property owners for this right of way.

Railroads are considered a public utility even though they are privately owned. They have common carrier obligation to serve customers and are regulated at the federal level to maintain safety, engineering standards, and competitiveness. Railroads hold the power of condemnation to take property if it is necessary to protect the public good and maintain efficient rail operations, but each state has different rules for when condemnation may be employed. The state of Georgia allows a railroad to condemn property under very specific circumstances, usually only to maintain or improve its own track for safety or efficiency.

Railroad Industries Incorporated (RII) has been consulting in the rail industry for over 40 years. RII has been tasked to develop this complex feasibility study due to its extensive experience with short line railroad development and costing, rail and truck transportation costing and understanding of standards of practice within the railroad industry.

Purpose

This study is developed as a Feasibility Study, which is specifically an assessment of how the financial aspects of the project pan out. Normally, any project involving condemnation would be a public project requiring a Cost Benefits Analysis instead (or in addition), which would also weigh in non-financial costs such as historical and cultural resources impact, community impacts and feedback, environmental impacts and mitigation methods and alternatives to assuage these concerns. The final selection might not be the least cost option when all factors are considered. However, at this time, the project is being treated as a private railroad condemnation, so a Feasibility Study analyzing costs and revenue for the specific alignment being pursued will be the focus.

Feasibility determines whether the costs of the project are covered by the revenue to be generated and if it will be profitable for the railroad. No one would expend millions of dollars in capital on a private venture without an expectation that the costs would be recovered and the investment would become profitable within a reasonable amount of time. In addition, public funds and condemnation are not usually granted if the project cannot be proven to actually show the public benefits, which in this case is a stable rail operation.

RII has not been provided yet with how the project is being funded. SRC could be funding the entire operation with private equity; or it could have other private investors enlisted, including possibly a private lender or bank; or it could be funding all or part of the project with public funding. Any private investors would require a return on their investment after a short period. This means that the railroad would have to operate profitably enough to cover the capital costs and yield enough for an internal rate of return of at least 10-20%.

Lastly, we will include with this Feasibility Study the feasibility and alternatives for Heidelberg. If Heidelberg spends $6 million in capital costs, it would need to sell enough additional aggregate by rail with enough profit remaining to cover the capital costs and a return on the investment. For this analysis, we have also compared the costs for several shipping alternatives for Heidelberg.

Methodologies

Railroad profitability is determined similarly to any business where revenues minus expenses equal profit. However, the costs of railroad operations are unique, and RII uses a proprietary short line costing model to project costs for prospective short line operations. Operating costs include locomotives and rolling stock to be used, track and equipment maintenance, fuel usage, railroad personnel including salaries and specialized railroad benefits for both operational and administrative personnel, and other specialized administrative expenses such as railroad insurance.

Railroad revenues are generally based specifically on carloads rather than straight dollars so that projections can be made based on volumes and changes in traffic for each industry shipping on the railroad. A rate would typically be chosen for each car that covers operational costs and pays for any capital costs by a certain time with an expected rate of return. Once modeled out, the standard revenue minus expenses equals profit generally applies.

All revenues have been developed by RII based on the documents and testimonies presented by SRC to date. Only traffic that is developed enough to project carloads is included. Very little information has been provided for any potential customers other than Heidelberg. If additional verifiable information is provided at a later date, the revenue figures can be amended. Rates have been selected to produce the maximum profit for the railroad to cover all costs and remain just under the shipper's costs for using another mode.

All operational costs for the short line railroad are collected and updated by RII for each project from standard indices, active rail equipment brokers, current railroad construction documents, etc. The costs are incrementally applied in the model based on track mileage, number of carloads, hours of operation, etc.

To determine return on investment or how long a capital cost will take to be recovered, the profits are modeled against the capital costs for a specific number of years. For public funding or public economic development projects, sometimes the internal rate of return can be 0 and the number of years expected to recover the costs can be as many as ten years. However, any private funding will usually require a greater return and a shorter time period, sometimes as few as three years to cover the capital costs and begin earning a lucrative return. Rates can be altered to increase the profit, rate of return, and speed of capital cost recovery, but they must always cover the operational costs of the railroad and they cannot go above what the shipper can tolerate and remain profitable. Without meeting these criteria, the operation is unstable and the project is not feasible.

All capital costs for the railroad have been developed using public indices, current construction data, bridge standards, CSX and GADOT requirements for construction, etc. RII developed our own capital costs for the new line since the figure presented by SRC seemed too low. The average cost per mile for constructing new main line railroad with no special issues today is a minimum of $2 million per mile. This should make the new 4.5 mile line cost at least $9 million at first glance. Plus, there are several bridges, crossings, and support tracks that would be needed. RII was able to inspect the CSX Camak Branch line from Sparta to Camak and the alignment where the new railroad line is proposed to be located. This allowed RII to establish the condition of the branch line for handling additional unit trains as well as capital costs likely for crossings, interchanges, and bridges. RII was also able to inspect property owners' parcels and interview some property owners for additional details on locations and schedule of project processes.

Inspection photos are attached to this report as Appendix C. Based on what RII witnessed and the capital costs provided by SRC to date, RII has developed the capital costs separately, since all capital costs for the project must be recuperated regardless of who is paying for them or constructing them.

Lastly, RII has costed Heidelberg's current aggregate shipments by truck to compare against what its rail rates would be using the new short line operated by SRC. Any shippers on the line would have to pay the rate for the new short line railroad as well as CSX's line haul rate. Therefore, this combined rail rate must be lower than what Heidelberg could ship by truck. All truck and rail costs come from public information or published indices and CSX rail costs are derived from the 2% waybill sample-Uniform Rail Costing System (URCS). These costs have been modeled against Heidelberg's planned capital costs to test the feasibility of its capital expenditures planned for this project and to measure its potential rate of return. In addition, alternative modes and routes have been suggested with accompanied capital and transportation costs.



Revenues

Revenue expectations are the most important factor for feasibility, and therefore, should be the most scrutinized. The expected revenue is what will ensure operating and capital costs are covered. There also must be enough revenue to make a private venture profitable and provide the expected rate of return for the financers.

The main driver for railroad revenues is carloads. Carload traffic is the bread and butter for railroads and is monitored carefully since railroads do not actually control the carloads they get to ship. They are essentially dependent upon what shippers send to them, shippers' marketing efforts for their own products, and the volatility of the commodities they ship. Railroads can help stimulate traffic growth by having excellent rail service that is flexible and efficient, encouraging shippers to ship more by rail versus other modes. However, this also requires that railroads maintain competitive rates with the other modes, which can often keep short line railroads' margins low.

Traffic

One of the key downfalls of railroad projects is overestimating the traffic for the line. The expected traffic drives the operating plan and the infrastructure needs in a cost intensive environment so it is crucial to plan for the expected traffic carefully. Railroading is not a "build it and they will come" industry. The capital costs of infrastructure and equipment alone require the risk be justified with guaranteed traffic, let alone the investments in qualified personnel, real estate impact and liabilities for heavy industrial rail operations. Many an intended economic development focused rail facility sits dormant today because it was developed upon the wish for traffic to materialize organically. Rail traffic does not happen that way. Each traffic lane must be specifically developed with all of the pieces in place, including loading, volumes, specialized equipment for each material, end markets and their unload capabilities, any special or multimodal handling along the way, and all of the associated costs to consider traffic secured for a rail operation.

For new operations, whether that is a spur on an existing railroad or a brand new railroad like this one, traffic is already speculative. Optimistic speculative traffic and revenue projections are fine to decide if a particular line of traffic is worth examining further, but that would be a preliminary, very high level guess at traffic and revenues only. For traffic to justify actually spending capital and entertaining adverse actions, it must be committed to by all parties involved in the shipments.

There are numerous steps along the way to ensure the traffic will actually move by rail and contribute to its revenues. Common questions that affect whether traffic materializes for a railroad include the following:

1) What customers and commodities can even ship by rail
2) What markets are they trying to reach
3) What are their comparative costs to ship via another line or another mode
4) What capital costs would be needed to allow the traffic to move by rail
5) What percent of shipper's traffic is likely to move by rail
6) What percent of shipper's traffic could move by another railroad
7) What percent of demand in market is shipper likely to get versus competition
8) Are end markets able to receive rail or spend capital costs to receive rail
9) What rail carloads will shipper commit to in order to justify the railroad's efforts and substantial costs in establishing a rail lane
10) What is the shipper's facility capacity which dictates maximum volumes

Only once the traffic figures are reliable can one begin to look at their revenues. RII is often involved in vetting new rail opportunities for new projects, railroad acquisitions, valuations, and feasibility studies. Speculative traffic is always treated cautiously. The following model is actually used in these analyses to vett new traffic opportunities for inclusion or not in actual revenue projections:

New Traffic Opportunity Pipeline

	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Criteria/ Steps	Ideas for new Traffic	Discussions with Parties	Any Contracts, $ spent, approvals secured	Tentative Schedule of traffic rollout by year	All Contracts & Commitments secured
	Assumed cause & effect growth	Ballpark traffic estimates	Ballpark estimates & schedule ok	Traffic est. w/ logistics/lanes/end markets confirmed	Committed Traffic and roll out schedule known
	Conceptual planning for new traffic	No Commitments, schedule, approvals yet	General operating plan made to handle traffic	Analysis for operating costs/ potential rates	Operating plan & Rates set
	General end markets	Capital Costs at least identified	Cap. Costs estimated w/ tentative schedule	Any Construction started/schedule/ acquisitions made	Any Construction near completion on schedule
Revenue Inclusion	Cannot incl, in Revenue	Cannot include in Revenue	Can add to Revenue at 10-20% of traffic estimates	Can add to Revenue at 25-50% of traffic estimates	Can add to Revenue at 60-80% of traffic estimates

There is an infinite array of possibilities that can derail or delay a planned project, from approvals and funding within any of the companies involved, changes in markets and the economy, construction and logistics issues, and legal and regulatory issues. These stages and steps toward ensuring traffic materializes protects railroads and their investors from substantial risk.

Many shippers misunderstand their "NEED" for rail transportation. Because rail transportation is ultimately a very cost intensive operation, it takes detailed planning to ensure a rail shipment will be economical, both for the railroad and the shipper. Rail shipping can be much more cost effective than trucking only if sufficient volumes are being shipped to maximize the weight by railcar and if the material is being shipped sufficient distances to compete with truck. Then the transportation savings must be enough to compete with other shippers to those markets. Each unique end user must have direct rail access as well, or trucking and transloading costs must be added. Then each lane has to consider how many railroads are in the routing to reach that market, including short line railroads. The more railroads in the route, the higher the costs. Once all of these tests are performed, many shippers find that rail is not the magic answer to provide access to far away new markets. Each lane – shipper to prospective customer – is a unique costing exercise to ensure it will be economical before wasting money on a losing venture.

SRC claims that five shippers will utilize the new line. However, only Heidelberg Aggregates has committed to traffic volumes and supporting information enough to count partially in the revenues for this line.

Southern Chips, LLC: This is a wood chip facility that produces chips for pulp and paper mills. It is located in Sandersville, GA, 20 miles south of Sparta. It currently ships by rail using the existing Sandersville Railroad located in Sandersville, interchanging traffic only with Norfolk Southern Railroad. SRC is also the owner of Southern Chips, LLC as the single member of its single-member LLC.

Southern Chips seems to have a misunderstanding about this rail project. Based on his testimony, Mr. Custer from Southern Chips believes that this new railroad will give him access to CSX, when in fact, the Southern Chips facility will not connect to this new railroad at all. This makes no sense since Mr. Custer is essentially an employee of SRC and should know well where this line is proposed. He has either been misinformed about the project or SRC has plans for this new railroad that it has not shared.

In order to reach the new railroad and CSX connection as proposed, Southern Chips would need to truck its product to Sparta for transloading to the railroad there, adding those costs to whatever the rail rate may be. If Southern Chips wishes to provide and commit to annual volumes that it would truck and transload in Sparta, its traffic could be added to the feasibility analysis. The testimony of Mr. Custer only provided the facility's capacity – not specific traffic that would be shipped via CSX. It does not appear that any market analysis has been done to identify customers for this business to develop the volumes. As it stands, this traffic is simply a desire for "CSX markets."

Veal Farms Transload, LLC and Revive Milling, LLC: We will treat these two companies as the same shipper since they are owned by the same people. Revive Milling is a corn and corn flour mill located in Sandersville on the existing SRC. As with Southern Chips, this facility will have no direct connection to the new railroad, and therefore no direct rail connection to CSX. Mr. Cale testifies himself that: *"Switching between railroads carries a substantial cost charged by railroads that either makes transport by rail uneconomic or drives up the cost of consumer products."(Ex 205199, p.4, line 12)*. This is true and includes short line railroads in the route. If Veal Farms Transload intends to truck for Revive Milling and other customers to the new railroad and transload for them, those costs would be added to the rail rates, driving up costs over customers with direct CSX access.

Mr. Cale has mentioned five commodities specifically for rail shipping, but did not provide any details or volumes for testing the lanes for feasibility. End markets must be identified, their ability and willingness to buy the commodity confirmed, and then volumes committed to include them in the feasibility analysis. These lanes would so need to be costed against straight trucking to ensure the origin end truck+transloading+shortline+CSX rate is actually less expensive.

Pittman Construction: This is a facility located adjacent to the Heidelberg quarry. All of Pittman's asphalt facilities are located near a quarry as the aggregate is used in the production of the asphalt. In many cases, Pittman has its own quarry area at the location for mining limestone aggregate, making it ready with all materials needed for its roadway construction business. Asphalt, concrete, and construction companies usually have an agreement with the quarry owner to operate next to it as a customer, sometimes paying a lease or per ton fee. They have a symbiotic relationship where the business of one generates revenue for the other.

Currently, only one of these quarries, Jefferson, GA, is located on a rail line with direct rail access. This is because usually, aggregates serve local markets and short distances are economical by rail. In order for a quarry to ship aggregates far enough for the rail economics to outshine the costs of trucking, it cannot be competing with local quarries. The quarry must market to the end market, ensure the end market can receive direct rail and develop transportation costs to prove the rail transport is better than other methods. Only when the end markets are secured in this way is it worth it for the quarry to spend capital in order to secure the business.

Pittman Construction Facilities	Adjacent Quarry	Rail Served? / Distance from Rail
Sparta	Heidelberg	3 miles
Oxford	Martin Marietta	1.5 miles
Jefferson	Martin Marietta	Yes
Siloam	Vulcan Materials	7 miles
Buckhead	Vulcan Materials	1.5 miles
Lithonia	Martin Marietta	2.5 miles
Demorest	Heidelberg	4.2 miles
Dillard	Vulcan Materials	27 miles

Sometime aggregates can move shorter distances by rail when there is only one railroad involved, called a local move. The fewer railroads involved in a lane, the lower the costs will be because each railroad must earn a minimum revenue per car factor. Rail shipments of aggregates are a small portion of all aggregates transported and the logistics are unique to every lane.

Pittman testified that it would bring inbound oil for making the asphalt. Oil typically moves in bulk on rail to a terminal facility that holds millions of gallons of oil at a time. Most of the oil is refined on site and the rest is sold to customers and distributed by trucks to the final end markets. Pittman testified that it currently receives its oil from a terminal in Lithonia and trucks to its construction facilities. Based on a rough estimate of .06% heavy crude oil to aggregate formula for asphalt, 1 ton of oil makes 17 tons of asphalt. It takes 284 gallons of heavy crude to make 1 ton. The average modern oil tank car holds 28,000 – 32,000 gallons, equal to about 4 truck tankers. Using the mean capacity, a single 30,000 gallon tank car of crude oil would make 1,796 tons of asphalt. If Pittman had supplied its annual volumes of asphalt produced at the facility, we would be able to estimate the number of oil tank carloads it would bring in. However, no such volumes have been estimated or provided by them.

The volumes would need to be high indeed to justify the $1 – 1.5 million in capital costs for a new oil terminal Pittman says would be needed to bring in the oil. For the construction of this new infrastructure at the Pittman facility, Pittman would need to save enough by moving its oil here by rail from what it is now paying by moving the oil by truck to pay for all of the costs. In addition, a rail spur would be required leading off the new railroad to reach the Pittman facility. The edge of the Pittman facility sits about 2,000 feet from the closest point proposed for the new rail line. Depending upon where the oil terminal would be located on the property and how many cars the facility would need to hold at one time, the required spur could be anywhere from 2,000-5,000 feet of additional rail track, or more depending on load, unload and switching requirements. Oil is also a hazardous material, so additional costs may be involved to set up required safety and environmental features. It would also add a level of certification and safety training required by the railroad to handle haz-mat materials.

If Pittman were able to provide and commit to traffic volumes and provide the breakdown of capital costs for this project along with a roll out schedule for the construction, the actual revenues and feasibility of this traffic could be measured for both the railroad's benefit and Pittman's. However, at this point, the traffic is simply an idea and none of it can be included in the feasibility analysis.

Heidelberg Aggregates

Heidelberg is the only solid source of traffic to justify this project at this time. Heidelberg has estimated traffic volumes based on the capacity of its quarry expansion, so these can at least be estimated as carloads. Heidelberg already ships 250,000-350,000 annual tons by truck to local markets. Out of a capacity of 700,000 tons, this leaves 350,000-450,000 tons available for other markets. By using the mean amount of 400,000 tons annually and using a maximum capacity of 114.5 tons per rail car, this yields 3,494 cars per year or 14 cars per day. ~~This equates to approximately 67 railcars per week for the weekly unit trains.~~

Heidelberg has identified some local end markets as, although no studies were provided to determine if these markets are conceptual, have been studied, have been secured or if these end markets can receive an entire unit train:

- Savannah, GA – 161 miles, 2.5 hours via truck
- Canadys, SC – 160 miles, 3 hours via truck
- Jacksonville, FL – 280 miles, 4 hours via truck

All of these locations are under 300 miles away, which is usually the minimum distance to look at transporting aggregates by rail more closely. It is just on the threshold of where truck may start to lose out to the bulk efficiencies of rail. However, if these moves use the new railroad, they will not be a CSX direct rate. They will be a two-railroad routing with a cost including CSX's factor as well as whatever the new railroad needs to charge to cover its operating expenses. Competitors for the same markets, like Vulcan, directly on CSX will have the cost advantage of only one railroad in the routing.

Capacity does not equal demand or traffic that will ship, so Heidelberg will need to ensure it has secured its end markets before counting on the traffic for the entire capacity of the quarry. In some cases it may need to wrest market share away from competitors. Revenue projections would usually count only a portion of the estimated traffic since the quarry has not secured the lanes. However, for purposes of this analysis, RII has given the full 400,000 tons of traffic to the analysis. The current 300,000 average tons shipped

Potential Customers	Type	Criteria/Steps	Stage	Included Traffic
Heidelberg Aggregates	Stone aggregates-located on new line	Possible Contracts, Traffic estimated/ committed, cap. Costs estimated-no sched.	3.5	100%**
Pittman Construction	Asphalt production/ Inbound Oil	Discussions; No traffic estimates, some ballpark cap. Costs conceived.	1.5	0%
Southern Chips	Wood Chips for Pulp/Paper	General market access, ideas, no est.	1.0	0%
Revive Milling	Corn/Corn Starch	General market access, ideas, no est.	1.0	0%
Veal Farms Transload	Grains/Other Customers	Discussed; Possible Grains, no traffic est., 1 possible end market, no Cap. Costs,	1.0	0%
** Allowing full traffic estimate for purposes of this Feasibility Study.				

to local markets by truck would continue to do so. The following chart shows how traffic was vetted and considered:

Rates

One way to help with revenues is to manage rates. Railroads have moved away from minimal margins and moved toward market rates since regulation relaxed in 1980. Railroads can increase rates so that revenue to cost ratios (RVC) can be as high as 4.5 on some moves. However, rural short line railroads rarely get to enjoy these high rates because they must ensure their own rate plus the Class I railroad with whom they connect remain tolerable to their customers. Short line railroads work more closely with shippers and can be more flexible, but they still need to cover their own operating costs and remain competitive with truck, which leaves a narrow margin much of the time.

However, rates for a short line railroad usually require modeling the operating plan costs to determine the minimum rate to charge. Then the shipper's cost to ship by another means would be the maximum rate for the short line. The short line knows what room it has for lowering rates to secure traffic by allowing the shipper to secure additional traffic lanes (customer contracts from end markets) or increase rates to cover capital costs and required margins.

Based on the information provided in the testimonies and presentation by SRC, we have modeled the costs for the operating plan on the new line in the Chapter called Operating Costs. The minimum rate per car this new railroad would be able to charge Heidelberg would be its cost per carload, which is $77.86 ~~72.26~~ or $0.68 ~~0.63~~ per ton, which would be a $0 profit, 0% margin and 0.00 RVC. The maximum rate would be what Heidelberg could get moving by another mode, and the cheapest developed in the Transportation Costs Chapter was using transload for a total cost of $109 per ton, or a rail rate of $124 per car. This would be only a 1.7 RVC. A survey of existing rail rates for moving aggregates (bulk non-metallic minerals except fuels) from CSX and NS public tariffs shows the average RVC to be 2.74.

As a note, the entire block of cars ~~unit train~~ must move to a single end market to achieve these rates. Any fewer cars shipped to a destination would increase rail rates. If Heidelberg ships its entire capacity to one location, the other markets are a moot point. The end market must be able to receive and unload the entire block of cars, ~~unit train,~~ or Heidelberg would need to add in the costs of storage and truck distribution.

This section develops the costs to operate and maintain the line to handle the expected traffic based on the operating plan SRC has described in its presentation. The operating plan was not detailed, but gave enough information for RII to make assumptions about how trains are being built, daily operations, etc. Since specific details have not been provided regarding the operating plan yet, RII has developed these costs based on standards within the industry and average rail costs for each component. These costs should be the minimum costs necessary for a safe and efficient operation. Based on SRC's information, there will be a daily trip to Heidelberg for switching the quarry and those cars will be taken to the CSX interchange daily and attached to the end of CSX trains whenever CSX trains are in the area. ~~one weekly trip to the CSX interchange to pick up and set out completed unit trains.~~

This operating plan will require the following:

- Two half time Engineer/Conductor personnel
- Two Locomotives
- Two 3030 ~~3,600~~ ft. tracks in the yard located near the end of the line for interchange and a minimum of 3,300 feet of track within the Quarry. This is enough track for sixteen 45 ft. open top bottom dump aggregate rail cars that will hold approximately 114.5 tons each, or a total of 1,832 tons, and the lead track from the proposed line to the possible loading location. The capital costs for construction of these tracks are explained in more detail in the next Chapter, Capital Costs.
- Heidelberg has stated they have enough rail cars for this operation already in their system so no costs other than car maintenance have been considered. However, Heidelberg's aggregate rail cars could have different configurations than the standard cars we used for calculations, which could affect how many feet of track will be needed within the quarry, train building yard, and the CSX interchange tracks.
- For daily operations that will occur 5 days a week, 16 empty cars will be delivered to Heidelberg for loading and will be picked up each day to be taken to the CSX interchange. ~~train building yard~~.
- ~~The 5th operation day will add a trip to carry the loaded unit train from the train building yard to the CSX interchange track used for loaded cars and where~~ Loaded cars will be added to the end of CSX unit trains each day CSX trains are in the area. CSX will have dropped off empty cars on the designated empty track.
- These empty cars will need to be picked up from the interchange and taken to Heidelberg or stored on the line until needed by Heidelberg. ~~the train building yard at the end of the line.~~
- Actual turn times for rail cars will depend on the target destination and CSXs' operating plan agreed upon with SRC. This will require at least 112 ~~160~~ rail cars dedicated to this operation.

- A minimum of 1,000 feet in side track is needed to store empty rail cars. Capital costs for the side track are detailed in the next chapter. ~~A minimum of two 3,600 ft. sidings are needed to store empty rail cars and to build the unit train. One track is for daily loaded car blocks and the other track is for pulling empty cars to be set out for Heidelberg each day. Capital Costs for the train building yard are detailed in the next Chapter.~~

There are four main categories of railroad operating expenses, Maintenance of Way, Maintenance of Equipment, Transportation, and General & Administrative. Payroll is generally assigned to the appropriate category or combined into a fifth category. For this operation projection, Payroll expenses will be included in the Transportation category.

Maintenance of Way: An industry average of $8,000 per mile was assumed to maintain the total estimated feet of 33,160 ~~38,160~~ for all track in this operation handling these traffic volumes ~~and unit trains~~, or 6.27 ~~7.23~~ miles which is 4.5 miles of main line, 1.15 miles of interchange, and 3,300 feet of track at Heidelberg including the 1,000 foot holding track. Actual Maintenance of Way expense is unique to each railroad operation and depends on the condition, age, terrain, environmental factors, and actual operations on the line. The estimated annual cost for maintenance of way in this operation is $50,160 ~~57,840~~.

Maintenance of Equipment: SRC owns 5 locomotives and is likely in a position to dedicate 2 locomotives to this operation without additional acquisitions. However, even if SRC owns these locomotives, there are periodic inspections, oil, lube, and other maintenance costs associated with maintaining this equipment to keep it in safe and compliant operating condition. Depending on the model, purpose, age, and condition of the locomotive, these costs will vary. RII assumed the use of GP-38 or similar locomotives which are the most common locomotive type with short line railroads. If SRC provides operating plan details with different locomotives, it could affect the costs. With the assumptions for this analysis, the estimated annual cost for maintenance of equipment is $40,000.

Transportation: SRC has stated they intend to use existing personnel to operate the line. We are assuming this will include at a minimum one Locomotive Engineer and one Conductor for this operation. The Bureau of Labor Statistics Locomotive Engineer average salary for 2021 (the most recent year with available data for Georgia) is $76,320. Railroad Conductor Salary for 2021 is listed as $72,790 per year. Since this is a small operation that does not require full time attention, we are assuming SRC will utilize these two employees at least 50% for an annual cost estimate of $105,868, including benefits. Railroad Benefits are calculated at an estimated 42% of salary, based on experience with other rail operations. SRC's costs could be slightly lower if it pays its employees below the state average for this positions or provides fewer benefits; however, no information was provided to the contrary, so the averages were used for this analysis.

Actual fuel consumption varies with the type of locomotive used in the operation and changes in the terrain of the line. We are using an average locomotive fuel consumption per hour to estimate annual fuel cost for this operation. The current Weekly Retail Diesel pricing is taken directly from the U.S. Energy Information Administration website for the Lower Atlantic Petroleum Administration for Defense District 1C that includes Georgia prices. For the week of July 31, 2023, this price was $4.10 per gallon. Using this factor and estimating the distance and hours the locomotive will be in use to move cars to

interchange every day, the annual estimated fuel cost is $42,848 ~~29,848~~. The total annual Transportation expenses including personnel and fuel is estimated to be $148,508 ~~135,716~~.

General & Administrative: It is assumed that most of these expenses would be covered by existing personnel within SRC's organization. However, this new railroad would likely require its own form of operating liability insurance protection, or at least additional coverage on SRC's existing policy for the new line and added risks of the unit train aggregate operations and additional interchanges. An estimate based on experience with other rail operations of varying size and scope for this coverage is $15,000 to $60,000 per year. We have used the mean amount of $37,500 for annual insurance for this operation. Actual cost would be unique to each operation and depends on the company that underwrites the policy and limits decided upon by the railroad.

Based on these costs, the new railroad would need to charge a minimum $77.86 ~~72.25~~ per car, or $0.68 ~~0.63~~ per ton, just to operate.

SRC Sparta Operation Costs		
	Year 1	
PROJECTED CARLOADS:	3484	
OPERATING EXPENSES		
MAINTENANCE OF WAY	$	36,000
MAINTENANCE OF EQUIPMENT	$	40,000
TRANSPORTATION	$	138,222
GENERAL AND ADMINISTRATIVE	$	37,500
OPERATING EXPENSES BEFORE D & A	$	251,722
COST PER CAR	$	72.25
COST PER TON	$	0.63

Based on the comparative mode options in Transportation Costs section, the maximum rate the railroad could charge would be what Heidelberg can get by another mode. The transload options can be handled for $1.09 per ton, or $124 per car (114 tons per car).

Charging the maximum rate, this project does not earn enough profit to cover its own capital costs, let alone pay back any debt or give a rate of return to investors/partners.

SRC Sparta Operation Projection	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028
PROJECTED CARLOADS:	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06
OPERATING REVENUES					
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398
OPERATING EXPENSES					
MAINTENANCE OF WAY	$ 36,000	$ 37,440	$ 38,938	$ 40,495	$ 42,115
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794
TRANSPORTATION	$ 138,222	$ 143,751	$ 149,501	$ 155,481	$ 161,700
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870
OPERATING EXPENSES BEFORE D & A	$ 251,722	$ 261,791	$ 272,263	$ 283,153	$ 294,479
EBITDA	$ 180,294	$ 187,506	$ 195,006	$ 202,806	$ 210,918
OPERATING MARGIN	42%	42%	42%	42%	42%
OPERATING RATIO	58.3%	58.3%	58.3%	58.3%	58.3%
COST PER CAR	72.25	75.14	78.15	81.27	84.52
COST PER TON	$ 0.63	$ 0.66	$ 0.69	$ 0.71	$ 0.74
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27



Capital Costs

Capital costs include any of the initial costs needed to be spent in order to generate the expected revenues on the project. This includes all infrastructure to be constructed to handle the project, all equipment to be installed to handle the project, costs of any security, safety, environmental or quality of life requirements to be installed or constructed, as well as non-tangible costs to start the project like permitting fees, operating authority fees, tariff publication, new engineer certification, etc.

RII developed its own capital cost estimates because the $7.4 million figure presented by SRC seemed too low. The average cost per mile for new railroad track construction in the U.S. at this time with no hydrology or topographical concerns is $2 - $2.5 million. That would make this line a minimum of $9 million without crossings, bridges, support tracks and other requirements. In addition, this area does indeed have wetland areas and hydrology concerns to mitigate, requiring additional culverts, drainage grading, etc. The $7.4 million figure is grossly understated for the actual capital costs needed for this project. It is likely that many of the required features were not included in SRC's estimate.

Therefore, without the detailed specifications provided from SRC on its track design plans, RII feels the actual capital costs will be much higher and has estimated them for ourselves for a more accurate feasibility analysis. If SRC can provide detailed track design specifications or show details on how its costs would be significantly lower, it could affect the feasibility.

It is important to have an accurate capital cost figure because these costs determine feasibility. The project is feasible if the capital costs can be recovered within a reasonable amount of time. Depending upon how the project is financed, where this breakeven point falls may need to be sooner rather than later to start earning a return on investment.

New Railroad Line Construction

Based on the route presented by SRC and its engineer Mr. Teague and testimonies taken to date, the new railroad will require, at a minimum, the following infrastructure to be constructed:

- 23,360 feet of main line track
- Interchange Yard for CSX and the new railroad 6,060 ~~7,200~~ feet of track
- 2 standard low rise 200 foot rail bridges to cross wetland areas over branches of Two Mile Creek
- Separated grade crossing under State Highway 16 in order to connect to CSX
- At-Grade crossings – 1 significant crossing on Shoals Rd. and 5 passive private crossings for property owners
- Support Yard at tail end of line with 1,000 ~~7,200~~ feet of track

Main Line Track: For the rail line itself, we have taken the 4.5 miles exactly as reported by SRC, which is 23,760 feet. This footage will be reduced by 400 ft. to account for the two rail bridges of 200 feet each that will need to be built to carry the train safely over branches of Two Mile Creek. Bridge costs are developed separately below. For the capital costs for the main line track construction, RII estimated on the higher end of the average range for per mile construction since there are hydrology issues, possibly requiring more culverts and other drainage mitigations. This would be a ballpark estimate of $2.5 million per mile. Therefore, the total costs for construction of 23,360 feet of main line track is estimated to be $11,049,280.

***Highway 16 Crossing*:** An at-grade crossing will not be allowed on Highway 16 due to the speeds and traffic on that roadway. It is assumed the connection to CSX on the other side of the highway would need to be an underpass similar to the one used by Vulcan next to it. This requires a new bridge for State Highway 16 and an underpass for the rail spur to connect with CSX crossing the GADOT easement and CSX right of way. This will be the only way for CSX to connect to the new rail line.

The bridge for Highway 16 is estimated to be 180 ft. long and 40 ft. wide, with a vertical clearance of 23 feet. RII has used the GA DOT Bridge and Structures Manual for CSX projects requirements for overhead installations, which requires a minimum vertical clearance of 23 feet from top of the rail to the bottom of beam. The cost estimate for this underpass and bridge would be from $1.5 million to $2.5 million based on GADOT project Fiscal Year 2024-2025 forecast projections. This is a very rough estimate only as GADOT and CSX would dictate the requirements and approve the final design plans. GADOT and CSX may even require their own teams to construct portions or all of the structures on their property, which involve even higher labor costs. For purposes of this feasibility study, RII will use the mean value of $2 million.

Interchange Yard: In addition to the Rail Line, two tracks will be required to interchange with CSX. One track will be used for picking up loaded rail cars. One track will be used to drop off empty cars. These tracks would need to be at least 3,030 ~~3,600~~ feet long in order to accommodate at least three days worth of Heidelberg's cars, or up to 44 cars. ~~a single 80 car unit train. It is not clear where SRC expects these interchange tracks to be located.~~

No communication with CSX has been revealed to indicate they would allow the interchange tracks to be constructed on their right of way between Highway 16 and the CSX main line tracks. This seems to be the location intended by SRC based on the alignment maps presented but would require a portion of the tracks be constructed directly on CSX right of way. It would be rare for a Class I railroad to allow this for a new railroad, so RII has developed the capital costs as if the interchange tracks are to be located solely on the new railroad's property. If a commitment from CSX to allow this is revealed at a later date, it would require additional capital costs for the underpass noted above to be three tracks wide and could affect overall feasibility in other ways. If these tracks were located on the other side of the CSX tracks, there would be additional capital costs for a rail crossing and land acquisition. If they were to be located directly off the CSX line on the proposed new railroad's right of way, there is not enough room before the first bridge to construct these tracks, unless that bridge were constructed to accommodate three tracks, which would add considerable capital costs.

Any additional capital costs for these different scenarios notwithstanding, the minimum costs for construction of the two tracks would be the same regardless of where they are located. The closest point on the new railroad alignment where two ~~3,600~~ 3,030-foot tracks could be constructed without affecting any other rights of way or bridges/underpasses or inclines is between the two proposed bridges, approximately 3,000 feet from the proposed CSX switch. This will require CSX to travel 3,000 feet into the new railroad's main line to pick up loaded trains and set out empties. According to CSX Design Criteria for unit trains, all turnouts or switches must be Number 10 or larger. Since these tracks will carry loaded trains and involve CSX requirements, RII used the higher end of the average cost per mile of $2.5 million per mile to estimate costs. Based on these parameters, the ballpark cost estimate to install the CSX interchange yard is $3,066,380 ~~3.61 million~~.

Rail Bridges: Based solely on the documents provided by SRC and the Teague Testimony, it is apparent there will need to be at least two low rise rail bridges crossing branches of Two Mile Creek. Based on the flood plains in those drawings, each bridge will be assumed to be 200 feet long for a total of 400 feet of rail bridge on the line. Estimate of rail bridges is based on previous design estimates on other rail lines and is $525 per track feet. The Cost estimate to install 400 ft. of rail bridge is $214,000.

At-Grade Crossings: Based on documents provided and interviews with the property owners, five crossings will be constructed to connect severed properties. It is assumed that these crossings will be passive crossings with grading, dirt roadway crossing, and crossbucks warning signs only at this time. It was indicated that property owners might be under the impression that the crossings would not be passive and would include lights and/or gates for safety reasons. Since no specifications were provided for the track construction, RII has assumed the more conservative and common profile for these private crossings; however, if the design is planned or required to include active crossing signals and/or gates, it would increase the costs for these five crossings to over $1 million. The total costs to install five private crossings is estimated to be $5,000.

The Shoals Rd. Crossing will need to be a major crossing. The GADOT will dictate what type of warnings and protections are required for this roadway based on traffic. The state of Georgia is one of the top ten states spearheading railroad crossing safety and removal of at-grade crossings, so it could ultimately require this crossing to be a separated grade crossing like the Highway 16 one costed above. However, for this estimate, RII has assumed a more conservative cost allowing an at-grade crossing. There is enough traffic on this roadway to warrant a Four Quadrant style crossing with gates. This type of crossing protect restricts vehicles from ignoring the gates and driving around them, a leading cause of railroad crossing collisions. According to a study conducted by the Federal Railroad Administration (FRA), four quadrant gates may reduce gate violations by 86%. Four Quadrant Gated Crossings range from $200,000 to $250,000 each to install. This same study also suggests applying Dynamic Envelope pavement marking at some crossings results in a 45% reduction in the number of vehicles that stop on railroad tracks versus far enough back for safer clearance. These markings are also visible at night from a much farther distance. White and Yellow Fluorescent Thermoplastic paints range in price from $1.47 per linear ft. for white and $1.74 for yellow. If a pedestrian sidewalk is also necessary (likely since the alignment runs more or less along Maggie Reynolds Rd. with numerous residences on that street as well as Shoals Rd. at this location), Gate skirts may need to be installed to reduce the number of pedestrian violations, such as sneaking under lowered crossing arms, which result in a 55% reduction in horizontal gate violations. Gate skirts cost approximately $500 per gate.

The total cost of materials for this crossing, including white pavement marking and gate skirts, is estimated to be $226,441. The total costs for all at-grade crossings is estimated to be $231,441.

Train Building Tracks: By taking all cars to the interchange every day, SRC states it needs only a 1000-foot sidetrack to hold one day's worth—16—of Heidelberg's cars, and RII agrees. ~~Two 3,600-foot tracks dedicated to building the unit train and storing empty cars will be required. One 3,600-foot track will be dedicated to building the loaded unit train throughout the week. Based on the limited details provided to date on the planned operation, these tracks will be located on the new railroad – not at the CSX interchange or the Heidelberg facility like Vulcan. As cars are loaded at the conveyor, they will need to be moved from the quarry to the unit train building tracks and the train will be built day by day. Only once the complete unit train is built would it be moved as a unit to the CSX interchange tracks. The second 3,600 foot track is for the complete empty train pulled from the CSX interchange once CSX drops off the empty unit train of railcars. The empty cars would be pulled to the train building tracks and stored, to be pulled to the Heidelberg facility as needed for loading.~~

Based on RII's inspections in the area, it appears that these tracks will be located in a new rail yard to be constructed at the tail end of the new railroad along Old Galilee Rd. For purposes of capital costs on this project, RII has included only the Heidelberg's tracks ~~unit train building tracks for this yard~~ since Heidelberg's traffic is the only traffic vetted as likely for this line at the current time. SRC may plan to utilize this yard for other customers and transloading, but no such traffic was materialized, estimated, committed to, or guaranteed for this project. If such traffic is materialized, there would be additional capital costs for additional tracks, switches, ramps and equipment, as other traffic cannot be serviced from the unit train building tracks. RII used the lower end of the average cost per mile of $2 million per mile to determine cost per track foot on these tracks since this track can be built with light weight track with less frequency of ties and OTM. Two switches will be required to construct this yard. Based on surveys of several rail construction companies that provide track components pricing, each switch will cost approximately $75,000. The Total cost estimate for ~~7,200~~ 1,000 feet of train building and empty storage tracks with 2 switches is $410,250 ~~2,953,800~~.

Land Acquisition Costs: These costs include all costs associated with securing the right of way land for constructing the line. These costs include but may not be limited to:

- Value of land acquired
- Value reduced from remnant land
- Legal costs of condemnation
- Lease/Easement costs for agreements

The total amount of property included in a 200-foot right of way for 4.5 miles is 109 acres. Based on the property surveys performed by SRC and presented in the Teague Testimony, these 109 acres would cross nineteen individual parcels. It appears that 65.72 acres of the right of way will be granted by property owners by lease or by easement. The

remaining 43.28 acres will be acquired by condemnation.

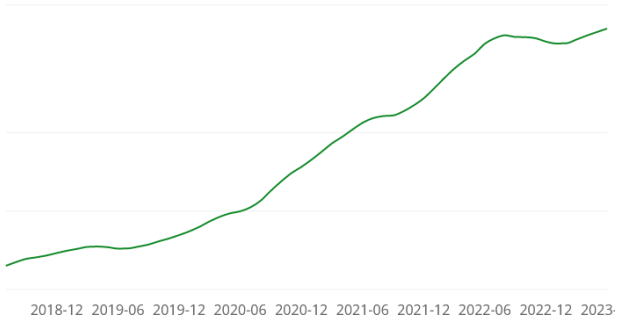
The following chart summarizes the parcels, ownership, and acquisition method:

Parcel No.	County Parcel No.	Owner	Acquisition Type
1	Class I Railroad RoW	CSX	Easement
2	State Highway 16 RoW	CSX/GA DOT	Easement
4	Communication Utility RoW	Verizon	Easement
6	166035	Briggs	Condemnation
7	186003	Marvin Smith	Condemnation
8	186004	William/Helen Smith	Condemnation
10	186009	William/Helen Smith	Condemnation
11	186010	William/Helen Smith	Condemnation
12	186011	Joel Reed	Condemnation
13	186013	Donald Garrett	Condemnation
14	186014	Wells/Hollis/Garrett	Condemnation
15		McEvers Family	Lease
16		McEvers Family	Lease
17	Irrevocable Land Trust	Moss Land Trust	Easement
18	186005	Thomas Lee	Condemnation
19	Heidelberg Quarry Easement	McEvers Family	Lease

Sometimes easements are granted without cost, sometimes they are a one-time fee and sometimes they are treated like leases with an annual payment due. Since we have no information whatsoever on the agreements between those landowners and SRC for those 65 acres, we have made broad assumptions as annual costs and included those in the Operating Costs section.

For the acreage to be acquired by Condemnation, the costs would be an initial cost to acquire the land. Condemnation requires that the property owners are compensated justly, which means full value for their land, any other damages the taking may cause to remnant properties and loss of future value.

For this Feasibility Study, the average price per acre was developed for land in the Sparta area. This is a rural area with nearby commercial development where land can be developed interchangeably for residential, commercial, agricultural or timberland. Average land prices in the Sparta area for all applications have gone up an average of 20% over the last year. With only a slight drop in values in the second half of 2022 when interest rates first rose, values began to climb again at the beginning of 2023 and are again at record highs.



A sample of property sales and listings in the area was taken from within the last 20 months, 2022 forward. The sample included all known qualifying sales and listings within the time period and within 3 miles of the target property right of way. These restrictions are important to ensure the property values reflect the specific property under valuation and are not skewed by unique trends in markets, such as the Sinclair Lake market to the west or the lower values in 2021 since property values have continued to increase. Properties are also omitted if the transaction record has incomplete data, had special circumstances (such as foreclosure or a family trade) that do not reflect open market value, or significant structures on the property.

A total of 10 qualifying properties were found within the parameters. All comparative property data was collected as of July 29, 2023. Although Sparta is still in what is considered a sellers' market and property values continue to increase, properties are currently selling for an average of 5% less than listed price.

Prop ID	Location	Distance from Subject (feet)	Price	# Acres	Sale Date	PPA (-5% for Current)
MLS#: 10147432	1042 Hamilton St, Sparta, GA	1.9 miles	$ 249,900.00	10.57	Current	$ 22,460.26
MLS#: 234023	326 Railroad St, Sparta, GA	2.8 miles	$ 25,000.00	0.17	Current	$ 139,705.88
MLS#: 59210	6133 Highway 15, Sparta, GA	1 mile	$ 304,300.00	86.24	6/6/2022	$ 3,528.53
Public Record	Buffalo Rd. @ E. Broad behind 140 Buffalo, Sparta	1 mile	$ 90,000.00	18.62	9/12/2022	$ 4,833.51
Public Record	13800 Augusta Hwy, Sparta, GA	2400 feet	$ 80,000.00	25.18	8/19/2022	$ 3,177.12
Public Record	767 Dunn Rd. Sparta, GA	3 miles	$ 20,000.00	4.61	6/27/2023	$ 4,338.39
Public Record	229 Maggie Reynolds Rd. Sparta, GA	1000 feet	$ 81,500.00	1.64	1/14/2022	$ 49,695.12
Public Record	230-300 Maggie Reynolds Rd. Sparta, GA	900 feet	$ 6,900.00	1.9	8/5/2022	$ 3,631.58
Public Record	3603 Highway 15, Sparta, GA	4500 feet	$ 1,752,427.00	811.23	1/12/2023	$ 2,052.20
Public Record	Behind 6000 Block Sanderville Hwy Sparta, GA	1.1 miles	$ 205,000.00	85.6	6/6/2022	$ 2,394.86
	Total # of Listings: 10		$ 2,815,027.00	1,045.76		$ 235,817.46

RII uses a two-step procedure for developing an average price per acre. This process protects against skewing for special features and bulk acreage. Two methods for determining the price per acre (PPA) were analyzed:

Aggregate Price Per Acre: This method prevents skewing from individual property listings with extreme pricing. Out of all properties in the sample, total all of the acres and the prices for all property and divide the total acres by the total price.

SUM (all property prices) / SUM (all acres) = PPA1

Average Price Per Acre: This method prevents skewing from bulk property discounts. Calculate the price per acre for each property listing, total all prices per acre and divide by the number of properties.

SUM (PPA for each property) / # of listings = PPA2

Then the mean of the two PPA values was used for calculating the average value for acreage in the right of way.

Based on the sampling collected at the end of July 2023, the average PPA is as follows:

PPA1 = $2,815,027 total price/1,045.76 total acres = $2,691.85.

PPA2 = $235,817.36/10 listings = $23,581.75.

The mean value of the two PPA methods is $13,136.80.

The PPA of @ $13,136.80 x 43.28 acres proposed for condemnation would be **$568,561** at the current time.

As a note, this is a ballpark figure and does not account for potential increased value to specific lots with potential commercial value accessible from Shoals Rd. where development is slightly stronger, properties with creek frontage or timber value. This ballpark analysis also does not account for possible features that could decrease value, such as easements, accessibility, and hydrology issues.

In addition, this figure does not include reductions in value the specific taking will have on the remainder of the parcels. The planned right of way will bisect most of the properties, leaving two smaller parcels intact. Although SRC will be providing a passive crossing to connect the two parcel remnants, the development options for each side will be reduced from what the entire large parcel could have supported. Therefore, the value of the taking goes beyond the simple price per acre taken. Lastly, as stated previously, land values in the area are rising, and any such valuation of land taken should consider a component for accounting for taking of an appreciating asset. At this time, these specific features and values of each parcel will not be examined, but if condemnation were to proceed, the value of all of these factors would need to be added to the total costs of condemnation, as well as the legal and litigation fees for the challenged condemnation, possibly adding another $1 million or more in additional capital costs.

The total initial Capital Costs associated with this project based on the limited information developed to date is estimated to be $20,627,082, broken down as follows:

Cost Component	Cost
Main Line track 4.5 miles	$ 11,049,280.00
Highway 16 Crossing	$ 2,000,000.00
CSX Interchange Tracks	$ 3,610,000.00
Two Rail Bridges	$ 214,000.00
At-Grade Crossings	$ 231,441.00
Train Building Yard	$ 2,953,800.00
Land Acquisition	$ 568,561.00
Total Estimated Capital Costs:	**$ 20,627,082.00**

New Heidelberg Facility Rail Infrastructure Construction

The Heidelberg quarry will need to construct significant additional rail infrastructure within its facility in order to have direct rail access. Currently the quarry ships only by truck. Heidelberg has mentioned that it will be constructing approximately $6 million in infrastructure improvements to its facility to support the rail service. Since Heidelberg only provided this ballpark figure and did not provide details on what would be covered with these costs, RII has developed its own capital costs based on the improvements Heidelberg has mentioned in public presentations and Testimonies.

An example of a quarry infrastructure designed to maximize rail efficiency is the Vulcan quarry next door. This facility has over 15,000 feet of rail infrastructure within its operation. It loads, stores, and builds trains within the quarry, providing its own rail switching by remote controlled locomotive slug units to move cars. Once a complete train is built, it is set out on the CSX interchange tracks also located within the facility. All CSX has to do is pull into the spur from its main line, set out the empty train of cars on a set out track and pick up the loaded train.

Ideally, Heidelberg would operate the same way to reduce the rail costs, which would be reflected in their rail rates. However, based on the infrastructure spending proposed and the facility layouts presented, it appears that the Heidelberg quarry may not have enough room for so many tracks with its planned pit expansion. In addition, SRC has indicated daily switching service for the Heidelberg facility, which indicates that SRC will be moving the cars in and out versus Heidelberg building its own trains. The tracks to be used for building the ~~unit~~ trains have been described and costed in the Train Building Tracks item under the new railroad's capital costs.

At a minimum, Heidelberg will need 3,300 feet of track for daily loading, empty car set out and switching maneuverability. This includes approximately 2,500 ft. lead track from the proposed line to the material storage area, the most likely destination of tracks inside the quarry, and one 800 ft. track used for loading, drop off, and pick up of at least 16 rail cars. This will require 2 switches with a cost estimate of $75,000 each, one off the proposed line and one for the loading track. Based on the information Heidelberg presented, RII has included one 150 ft., or two 75 ft. conveyer system with an estimated cost of $225,000 used for rail car loading, one $75,000 rail car scale, and approximately 6,000 ft. of sound mitigating berms that are 20 feet high with tree cover and 360 feet wide at the base of the cross-section. The estimated cost for quarry infrastructure is $6,200,700.

In addition, with 16-car blocks, Heidelberg will need to secure approximately 112-128 cars for its operation. We have assumed that Heidelberg has these cars within its system, but if they need to be acquired, the cost of each new car is approximately $125,000, while used cars average about $23,000. On the low end, total extra capital costs to Heidelberg would be $2.8 million - $3.2 million. Lease rates are approximately $900-$1000 per month. However, with time, Heidelberg will likely find a need for an even larger number of cars because blocks of cars smaller than unit trains suffer from delays in service extremely often. ~~In addition, Heidelberg will need to secure at least 134 open top hopper cars for its unit train rail operations. Class I railroads no longer supply the equipment for these moves, especially since the cars would be held for 5-7 days within the Heidelberg facility. We have assumed that Heidelberg has these cars within its system, but if they need to be acquired, at approximately $125,000 each car, this could be an additional capital cost of up to $16-17 million.~~

All costing estimates were approximated using online research, survey, and design estimates from actual project forecasts. Any changes to the assumptions in design, equipment, operating plans, etc. could affect feasibility; however, no such details have been supplied at the time of this report.



Transportation Costing Comparisons

This section compares the costs for Heidelberg shipping its 400,000 tons of aggregate to a single location by multiple mode options.

Current Truck Costs

Heidelberg currently transports its aggregates by truck to local markets. Technically, all of the following markets identified by Heidelberg would be considered local markets because they are less than 300 miles:

- Savannah, GA – 163 miles, 2.75 hours via truck, 5.5 hours round trip
- Canadys, SC – 161 miles, 3 hours via truck, 6 hours round trip
- Jacksonville, FL – 281 miles, 4.3 hours via truck, 8.6 hours round trip

Therefore, let us begin by developing those trucking costs for comparison. These costs assume utilizing all existing roadways to these points.

Assumptions for the truck costing are as follows:

- Trucks costed are a 3-axle dump truck with a tare weight of 26,800 lbs. and a maximum load capacity of 26.6 tons or 53,200 lbs.
- According to the manufacturer, these trucks average 7 miles per gallon of fuel fully loaded at speeds up to 35 mph, and 9 miles per gallon at speeds up to 65 mph.
- According to the Bureau of Labor Statistics, the 2022 mean average wage for Heavy and Tractor Trailer Truck Drivers in the Middle Georgia nonmetropolitan area is $22.35.
- We are assuming Heidelberg has its own trucks to handle this operation with no additional capital costs.
- Current Weekly Retail Diesel pricing of $4.10 per gallon for the week of 7/31/23 is taken directly from the U.S. Energy Information Administration website for the Lower Atlantic Petroleum Administration for Defense District 1C that includes Georgia prices.

Heidelberg's existing trucks may have slightly different costs depending on its own costs of capital, lease terms, or truck types.

All traffic originates from Heidelberg Quarry 2403 Shoals Rd, Sparta, GA 31087. There are no tolls assumed or known for any of these routes. For comparison, we are assuming that each destination receives the entire daily production of 1,832 tons.

Port of Savannah, GA

This 326 mile, 5.5 hour round trip route assumes one loaded truck per day for each truck or 69 trucks and 69 drivers. This route will consume approximately 36 gallons of fuel or $148.51, each driver will cost $122.93, adding in estimated average fixed costs such as insurance, tires, vehicle maintenance, permits and licensing, and vehicle depreciation, we have a cost per ton of $24.88.

Canadys, SC

This 322 mile, 6 hour round trip route assumes one loaded truck per day for each truck or 69 trucks and 69 drivers. Each truck will consume approximately 36 gallons of fuel or $146.69, each driver will cost $134.10, adding in estimated fixed cost such as insurance, tires, vehicle maintenance, permits and licensing, and vehicle depreciation, we have a cost per ton of $25.24.

Jacksonville, FL

This 562 mile, 8.6 hour round trip route assumes one loaded truck per day for each truck or 69 trucks and 69 drivers. Each truck will consume approximately 62 gallons of fuel or $256.02, each driver will cost $198.92 including .6 hours of overtime at a rate of $33.53, adding in estimated fixed cost such as insurance, tires, vehicle maintenance, permits and licensing, and vehicle depreciation, we have a cost per ton of $42.20.

This means that Heidelberg's costs to ship the same tonnage by rail would need to be less than these. Trucking does not have the cost benefits of shipping an entire unit train of tonnage to the same location, so for destinations that can receive a whole unit train, rail could have an advantage. The next section examines this.

Railroad Costs

If Heidelberg is able to ship directly by rail using the new railroad, its rate would be considered a "Through-Rate." This is a combined rate that includes the revenue required by all railroads in the route. Heidelberg's total Through-Rate would include the portion for CSX as well as the new railroad.

For CSX's portion, Class I carriers will usually provide a private contract rate for customers with specific lanes, commodities and committed unit train volumes. However, the rate will always provide a minimum revenue over its costs to handle the freight for the Class I. A conservative RVC of 2.00 has been used to develop these rates assuming that Heidelberg would get a private rate below the average RVC for moving aggregates of 2.74, but the final rate would be a matter of negotiation with CSX.

The railroad costs for CSX operating these three routes are as follows:

CSX Portion Only	Total RR Cost per Ton	Fuel Cost	Labor: Crew, Dispatch, Clerical	Road Locomotive	Yard & Industry Switching	Track & RoW	Rev/Cost Ratio	RR Rate	Total Miles	Round Trip Transit Days
Sparta to Savannah	$ 4.79	$ 0.90	$ 1.42	$ 0.64	$ 0.19	$ 1.65	2.00	$ 9.59	195.4	2.8
Sparta to Jacksonville	$ 8.84	$ 1.67	$ 2.38	$ 1.18	$ 0.19	$ 3.06	2.00	$ 16.95	341.3	3.1
Sparta to Canadys	$ 5.57	$ 0.98	$ 1.31	$ 0.56	$ 1.23	$ 1.48	2.00	$ 11.15	179.6	3.1
CSX	$ 3.61	$ 0.64	$ 0.96	$ 0.46	$ 0.37	$ 1.18			139.5	2
H&B	$ 1.97	$ 0.34	$ 0.35	$ 0.11	$ 0.87	$ 0.30			40.1	1.1

For this analysis we have assumed that the end user can also receive and unload the entire block of cars ~~unit train~~ within 24 hours. If this is not the case, there could be additional costs for unloading, trucking to end users, storage, etc. All equipment is assumed to be owned by Heidelberg so no demurrage or car hire is considered. CSX does not impose fuel surcharges as they have fuel worked into their annual rate escalation. All lanes assume a 16-car block ~~67 car unit train~~ loaded with 114 tons once per week using CSX Direct routing (with the exception of Canadys as described). STCC code is 1441225 for crushed raw granite.

Note, any other railroads in the routing at destination end would increase the costs/rates. Many routes that imply a CSX Direct rate actually have a short line handling carrier on the other end that does not show up in the routing. This is the case for Canadys, SC, which implies CSX serves Canadys, but actually is served by a short line called Hampton and Branchville Railroad, operating on CSX leased track. This is why the rail costs to Canadys are higher than the costs to Savannah, even though the miles to Canadys are fewer.

CSX can actually charge as much as it wants over this cost as it wants, bringing the rate just low enough to ensure it moves by rail, presuming it desires the traffic. Using Savannah as the benchmark, the lowest CSX rate would then be ~~$9.59~~ $13.08/ton.

For the new railroad's portion, the minimum costs it would be able to charge as a rate to Heidelberg would be its own cost per ton to handle aggregates, shown to be $0.68 ~~0.63~~ per ton in the Operating Costs Chapter. Then the CSX portion would need to be added onto that, for a total of $13.76 ~~10.22~~ per ton. The maximum rate would be at what cost Heidelberg could ship the aggregates using truck. Using Savannah as a benchmark, that would be $24.88/ton. Therefore, the tolerable range in rate for Heidelberg to utilize rail would appear to be anywhere between $10.25 and $24.00/ton. However, Heidelberg still has a much lower cost option for utilizing rail as discussed next.

Transload on CSX

The resounding argument for this new line has been the "need" to access CSX. However, the costs of adding in the additional railroad to the rates would hamper that access, making the rates less competitive with trucking or eliminate many market options. Therefore, a transload off the CSX Branch line would actually give Heidelberg Direct CSX access, which is a specific and crucial factor.

This option could also be set up at a ***fraction*** of the capital costs associated with the new railroad. There would be no need for a crossing over/under State Highway 16 or Shoals Rd. There would be no bridges or impacts to wetlands or waterways to consider.

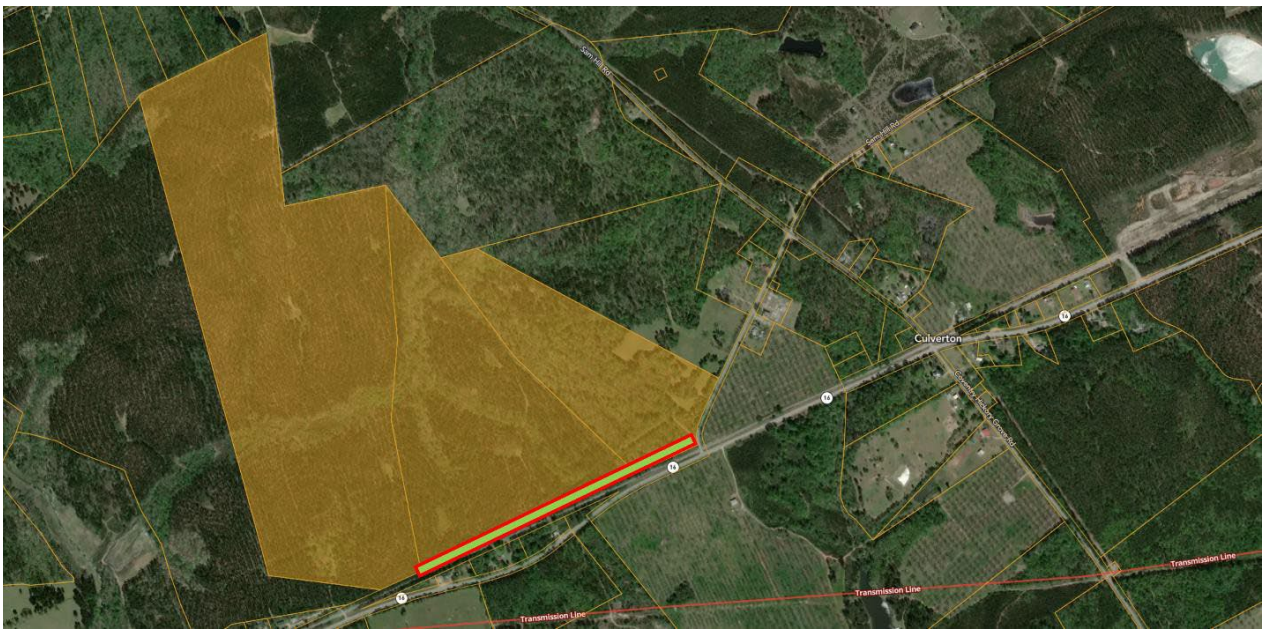
Heidelberg has mentioned that it has discussed with CSX in the past the possibility of establishing a transload directly on CSX's branch. No details of these discussions, including capital and transport costs or CSX requirements were provided. Therefore, RII has developed estimated costs for this option to see if a Transload Project would be feasible for Heidelberg.

Traffic: RII has assumed the same traffic for the transload operation as that assumed for the new short line operation: 400,000 tons or 67 carloads per week.

Operating Plan: CSX would set out an entire train set of cars on a single track to be loaded. Heidelberg would truck loads to the empty train throughout the week filling the cars from the trucks. At the end of the week, CSX will come pick up the full and complete train. At the same time, CSX would drop off the empty train set on a second track for Heidelberg to begin filling. There would be no need for in-plant train switching with this operation.

Capital Costs: The location of the transload could be anywhere on the north side of the CSX branch. It would require clearing, grading, construction of two tracks for loading unit trains and setting out empties with associated switches, derails, etc. In addition, we have included costs for paving the truck lanes in the facility to mitigate any runoff and environmental concerns since there have been issues with other quarries in the area in the past (however, Heidelberg might be able to simply use gravel to mitigate this concern at a lower cost and pave later only if found necessary).

Land: A narrow strip of land at least 3,600 feet long would be needed for two unloading tracks. RII estimates the minimum width as 70 feet to accommodate two tracks, a loading lane for trucks next to the tracks on the outside of either track, and a passing lane for trucks to get around or back out. For this analysis, we will assume a 70 x 3,650 foot strip of land to handle all operations, or 5.865 acres. Although the facility could be located anywhere along the CSX right of way, it appears there may be an ideal location on the west side of Roy Smith Rd., about 1.25 miles east of Vulcan (from the CSX switch heading into the quarry). This location would touch only three legal parcels that have only timberland and no structures located anywhere on the parcels, and would only shave off a small edge of the parcels versus bisecting them. There is also room to grow without adding impact to surrounding properties if needed at a later date.



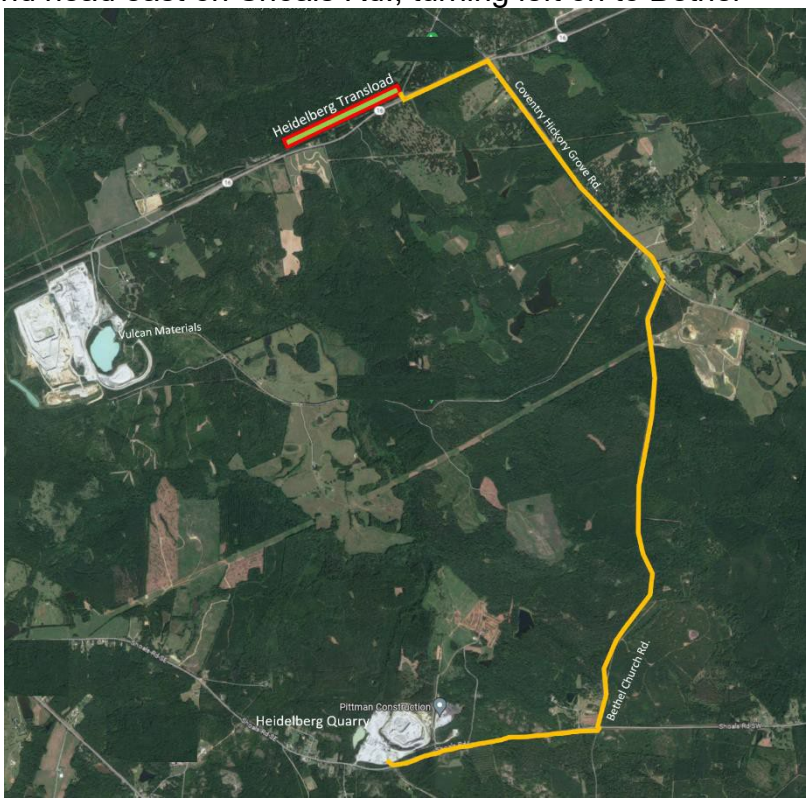
Based on the price per acre developed previously in this report for the Sparta area, $13,136.80 x 5.865 = $77,047 for land cost.

For facility construction, the following ballpark estimates have been made:

- 7,200 ft of track calculated at $473 per foot since this is connecting to CSX $3,405,600, one for transloading up to 80 cars and one for CSX to set out up to 80 empty cars.
- Two #10 switches required for CSX interchange for $200,000
- Two 10 ft. mobile conveyer systems for unloading trucks for $30,000
- Grading and paving for one loading lane along each track for $216,000
- Grading and paving for Bethel Church Rd. $807,480 (The main purpose of this cost would be to increase road speeds and turn times, as well as mitigate dust and noise for residents. Technically, these are public county roadways that Heidelberg could use anyway; however, this simple mitigation is easily recovered with the transportation savings would provide a safer and more cost effective operation. Heidelberg could also add a shoulder to Bethel Church Rd. and Coventry Hickory Rd. to increase travel speeds, reducing turn times, truck costs and labor).
- One rail scale for $75,000

Total Ballpark Capital Cost Estimate for the transload option is $4,734,080.

Route: The route recommended for this transload facility would be 5.74 miles. Trucks would leave the Heidelberg facility and head east on Shoals Rd., turning left on to Bethel Church Rd. then left again on Coventry Hickory Grove Rd. Trucks would then turn left onto Highway 16 for about ½ of a mile before turning right to use the Roy Smith Rd. existing passive railroad crossing then left into the transload facility. There is clear line of sight here for trucks to watch for the weekly trains for Vulcan and Heidelberg before exiting Highway 16 and turning onto the crossing to enter the transload facility.



Transportation Costs: These costs include the trucking costs to move the same amount of aggregate from the quarry to the transload site by truck and then have CSX ship it directly as a unit train. The total round trip miles are 11.48 miles. For this analysis we have assumed that the end user can receive and unload the entire unit train within 24 hours. If this is not the case, there could be additional costs for unloading, trucking to end users, storage, etc.

To compare with rail, we are assuming operating 52 weeks per year and 5 days a week to transport 400,000 tons. This results in 1,538.46 tons of material 57.84 or 58 truckloads per day that will need to be moved by the trucking operation. Assuming each truck will need to make a 43 minute round trip or 10 trips per truck in an 8 hour period. This is an optimized operation of 23 minutes drive time each way plus 10 minutes load/unload at each end. This leaves a flexible 50 minutes leeway for drivers handling the mobile conveyor at unload end and contingent traffic. This will require 6 trucks and 6 drivers to handle this traffic. Each truck will travel 115 miles in a day. For fuel, with 7 miles per gallon this equals 16 gallons or $67.24 per truck. Truck driver cost is estimated to be $178.80 per day.

Adding in fixed costs such as insurance, tires, vehicle maintenance, permits & licensing, and vehicle depreciation, we have an estimated cost per ton of $1.09. It is possible that Heidelberg may have access to volume fuel pricing that would reduce this cost.

One Way Miles	Round Trip Miles	Total Fuel Cost	Driver Cost	Fixed Cost	Permits & Licenses	Vehicle Maintenance	Tires	Vehicle Depreciation	Vehicle Insurance	Total Truckload Cost	Per Ton
5.74	11.48	$67.24	$178.80	$6.97	$.32	$2.25	$.52	$2.87	$1.01	**$290.96**	**$1.09**

This would be the maximum rate per ton the new railroad would be able to charge Heidelberg for it to remain economical for Heidelberg: $1.09 per ton; otherwise, Heidelberg could just transload it. Heidelberg would still be paying the same CSX portion, so its total point to point rate per ton would be $6.90 per ton to ship these unit trains by rail using the transload.

As a note, ***any*** potential customers would be able to utilize such a transload facility for Direct CSX access and save the entire rate factor of another railroad in the route. They would need to test to find out if the CSX routes and markets they wish to tap actually can be reached more cheaply than their current access with Norfolk Southern.

Other shippers would also likely need a large block or unit train of material to ship to a single end user market, or CSX will include in its rate to them the entire costs of sending a separate locomotive down the Camak branch for the small amount of cars.

Even though they are a common carrier and "must" pick up and deliver the freight, the rates charged will be cost prohibitive if they are not large amount that CSX is happy to serve, like the unit train aggregates keeping the branch operating at this time. Twenty cars of inbound oil per week plus ten cars of grains and ten cars of chips will not be enough for CSX.

There is an alternative routing option as well using existing paved roadways, but would involve higher traffic roadways and additional miles, adding to the per truck costs. Trucks would leave the Heidelberg facility and head west on Shoals Rd., turning right on Highway 15, north into Sparta, and then right again on Highway 16. Trucks would turn left to use the Roy Smith Rd. existing passive railroad crossing then left into the transload facility.

This option has not been costed separately at this time but would add approximately 2.8 miles to each one way truck trip.

Total Transportation Cost Comparisons

Using Savannah as the benchmark lane, the following chart compares the three transportation options Heidelberg has for transporting its 400,000 additional tons of aggregates from the Sparta quarry to a single point: Savannah:

Mode(s)	Truck/ Transload Cost	Railroad 1 Cost	Railroad 2 Cost	Total Rate per ton
Truck entire route	$ 24.88			$ 24.88
Direct Rail using New RR + CSX charging maximum to recuperate capital costs		$ 1.09	$ 9.59	$ 10.68
Truck to Transload+CSX Direct	$ 1.09		$ 9.59	$ 10.68

The key is that the Transload option requires $1.5 million LESS in capital spending than the direct rail options using the proposed short line railroad. In addition, its railroad service could not possibly be stable if the serving short line railroad is not a stable operation supported by the rate; it would likely end up needing to charge more to continue to operate.

This chapter is essentially a summary of the details developed in all previous chapters to model against and show different measurements for feasibility.

Feasibility Tests

As shown by the Operating Plan and Costs Chapter, the new railroad is only profitable if it charges at least $0.68 ~~0.63~~ per ton. In addition, based on the Transportation Costing Chapter, the maximum it could charge would be $1.09 per ton or the transload option is more economical for Heidelberg.

The problem for the new operation is that it also has over $19 ~~20~~ million in capital costs to recover before showing actual feasibility. Even by charging the maximum rate it could in order to keep Heidelberg's traffic, after projecting out the operation, it shows the project could not even recuperate half its costs after 20 years, only the first 5 years and the final year are presented below, full 20 year projections are provided separately.

SRC Sparta Operation Projection	Year 2024
PROJECTED CARLOADS:	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00
OPERATING REVENUES	
TOTAL OPERATING REVENUES	$ 432,016
OPERATING EXPENSES	
MAINTENANCE OF WAY	$ 36,000
MAINTENANCE OF EQUIPMENT	$ 40,000
TRANSPORTATION	$ 138,222
GENERAL AND ADMINISTRATIVE	$ 37,500
OPERATING EXPENSES BEFORE D & A	$ 251,722
EBITDA	$ 180,294
OPERATING MARGIN	42%
OPERATING RATIO	58.3%
COST PER CAR	72.25
COST PER TON	$ 0.63
RATE PER TON	$ 1.09

SRC Sparta Operation Projection	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028	Year 2044
PROJECTED CARLOADS:	3484	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06	$ 271.70
OPERATING REVENUES						
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398	$ 946,600
OPERATING EXPENSES						
MAINTENANCE OF WAY	$ 36,000	$ 37,440	$ 38,938	$ 40,495	$ 42,115	$ 78,880
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794	$ 87,645
TRANSPORTATION	$ 138,222	$ 143,751	$ 149,501	$ 155,481	$ 161,700	$ 302,861
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870	$ 82,167
OPERATING EXPENSES BEFORE D & A	$ 251,722	$ 261,791	$ 272,263	$ 283,153	$ 294,479	$ 551,554
EBITDA	$ 180,294	$ 187,506	$ 195,006	$ 202,806	$ 210,918	$ 395,046
OPERATING MARGIN	42%	42%	42%	42%	42%	42%
OPERATING RATIO	58.3%	58.3%	58.3%	58.3%	58.3%	58.3%
COST PER CAR	72.25	75.14	78.15	81.27	84.52	158.31
COST PER TON	$ 0.63	$ 0.66	$ 0.69	$ 0.71	$ 0.74	$ 1.39
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27	$ 2.38

This is based on these assumptions:

- Traffic from Heidelberg remaining consistent; 700,000 tons was reported as the quarries capacity. Wither a rollout schedule for any future expansions or committed traffic from another customer, including roll out schedule, no additional traffic can be considered.
- Rate escalation matching cost escalation of 4% annually.

Normally, we would project out the operating costs against expected revenues for a number of years to recover the capital costs and show what rate of return the project could provide. A project may have a negative profit for several years after a major capital expense, but would be expected to recover the costs within a certain amount of time. Projecting out shows how different rate increases, traffic changes – even organic growth, and streams of revenue can quickly improve profitability. However, this project would not recover even half its initial capital cost after 20 years. This leaves nothing for any rate of return. Rail carloads would not increase organically as the traffic volumes have been based upon the maximum capacity of the quarry. Rates at this point have been assumed to escalate at no more than rail costs each year, keeping the margins the same, which in this case is still negative. Pro forma financial statements have also not been developed for this operation to show cash flow and debt recovery as there is not enough profit or cash flow to pay off the debt within a reasonable amount of time.

Economic Development Focus

If this were solely an economic development project where a grant was received to install a project for the hope of future economic development, there might be less concern over the project proving it could support itself. Grants do not need to be paid back and there is less concern over profitability. However, the trade-off for this type of funding is usually that an economic development agency seeking out or applying for such funds has likely already performed the studies needed to show significant need or ability to use the project. There would appear to be an economic development entity behind and supporting the project: Sparta Hancock Development Authority (SHDA); however, research indicates that this organization may have only one member, Mr. Haywood, mayor of Sparta, so it is not clear whether any actual economic development organization, professional expertise or completed studies behind this project.

Another quality of economic development projects is that they are usually designed with the support of the communities they are supposed to benefit. There is almost always a public feedback component to these projects.

This does not mean forcing the community to legally fight the project with a day in court, but proving that a public feedback process is performed as part of the project's due diligence before proceeding with any options. Usually, multiple scenarios are developed and presented and the public feedback is a factor in determining which option is chosen – the most benefits with the least harm, treating harm to individuals in the community and their properties as harm. It is possible in many of these circumstances that the lowest cost option is not the least combined harm. This public process is another Trade-off for access to public funds with no future fiscal responsibility to justify the funds. The County Board of Commissioners who Mr. Haywood testifies asked him to be the Executive Director of SHDA is not on record as supporting this project specifically because of the community's opposition to it.

There also seems to be questions as to whom this project benefits. Obviously, any increased business and revenue within the County is beneficial in tax revenue. However, this is rarely the only or main benefit for a project of this scale and physical impact. SRC and Heidelberg claim that the project will add numerous jobs, but many of the jobs for these operations (indeed all of the jobs from SRC) would be handled by existing personnel who live in other counties. This would also likely be the case for any increased spending from the new business brings since its headquarters is in Sandersville. Interviews with residents claimed that most of the workers at the quarry were not residents of Hancock County. Unless the new jobs created are for residents of Hancock County, then it isn't really economic development for the county or city.

Hancock County indeed has one of the lowest per capita incomes related to other counties and businesses have been closing over the last several decades. Although a large portion of residents within Hancock County are not employed, this is not an unemployment figure. Over 25% of Hancock County residents are over retirement age of 65 and live in Sparta because they have retired there to live away from heavy industry. Numbers are being thrown around to create an impression of grand economic development and opportunity for everyone in the County, but it is important to examine those numbers to see how they are really benefitting those impacted or whether they are just a clever spin.

The county might look at other options for economic development such as capitalizing on the historical and environmental aspects of the county as a retreat or tourist locale. In addition, it could encourage commercial development along the existing I-15 and I-16 corridors versus cutting pushing through a brand new and unnecessary right of way. There are numerous avenues toward economic development that do not take people's private property because someone else wants it or doesn't appreciate how they want to us it.

The county would get the tax benefits of the quarry expanding whether the rail spur is constructed or not if Heidelberg uses the Transloading option. Heidelberg would also still add the jobs it has noted, whether those are Hancock County residents or not. However, there would be no property condemnations and it would save at least $19 ~~20~~ million in costs being paid by someone, possibly taxpayers if the project is paid for with public funding. The current local markets served by Heidelberg with trucks would continue with no trucks being removed from existing roadways and the transload option for Heidelberg adds only six daily trucks to the roadways.

Since Georgia does not allow condemnation for economic development purposes, this project must present a clear and present (not many years down the line) need for this property for more than one customer. This has not been done to date. For any funding partners in this project, as presented to the courts so far, the project is not feasible itself and would not produce any rate of return for decades. Although much information has been requested to answer questions and resolve many of the assumptions that had to be made with this report, it is doubtful that enough traffic can be produced within the foreseeable future to justify the project or the rates CSX would charge to operate on the branch line. There seems to be much talk of "other shippers on the line" and future development "on the line." And yet, there are no other shippers on it without substantial additional unjustified capital. Just because a railroad starts up hoping to draw more industries does not mean the serving Class I CSX will not charge high (uncompetitive) rates to move it. Unless there are plans to continue taking property as "needed" and try to connect this new line to another railroad to gain NS and CSX access, which would cause competition alarms with Norfolk Southern and the STB, and is also not the purpose presented to the courts for these condemnations, then most of the testimonies regarding future possible traffic, future speculative facilities, hopes for economic development, etc. are simply wishes and misinformed about where the actual proposed line is located and how it connects to the national rail system.

Conclusions and Limitations

In conclusion, the project has not been developed enough to prove its feasibility. Based on all concrete details developed so far, the project is not only infeasible, it does not make sense that anyone would spend this much capital for the amount of revenue to be generated. Without further details show where the money is coming from, how their costs were developed or how traffic is guaranteed, SRC and Heidelberg would end up spending $13.6 million only to find they are short another $12-13 million to even move the traffic.

Limitations

The following caveats and limiting conditions apply to this Feasibility Study and any changes to the assumptions that had to be made would alter the feasibility of the project.

- No discovery was performed at this stage so the information available was extremely limited. Basic materials such as the breakdown in detail for the track construction cost estimates from SRC and facility improvements from Heidelberg have not yet been received. The lack of information and detail required many educated assumptions for the details on the analysis. It is the hope that given the scrutiny that this project will be given, SRC, Heidelberg and potential shippers for this project will provide the details expected.

- There was a limited time to compile analysis that should have been performed on this project before proceeding. This analysis should be taken as a high level feasibility analysis. If all parties want to supply their actual costs, it could alter the results.

- All estimates for measurements, costs and timing are ballpark estimates only based on the limited information provided. No detailed surveying or engineering estimates were performed by RII or provided by SRC at the time of this report.

- Mandatory requirements from CSX for crossing its right of way or interchange could affect capital costs for interchange tracks and operational costs.

- Mandatory requirements from GADOT for all crossings could affect the capital costs.

- Material costs, labor costs and inflation have been volatile for the last 3 years. Values and costs in this report are estimated as of the date of this report only and the situation will likely change significantly the farther forward time goes from this date as interest rates rise, markets fluctuate and costs increase.

- Mandatory requirements from STB for operating authority and conditions regarding competitiveness could change the operating plan allowed and affect costs.



Appendices

Appendix A - Abbreviations

Abbreviations	
CSX Transportation (Class I Railroad)	CSX
Federal Railroad Administration	FRA
Georgia Department of Transportation	GADOT
Norfolk Southern Railroad	NS
Steel Track Materials (Other than Rail)	OTM
Price per Acre	PPA
Rail Cost Adjustment Factor-Unadjusted	RCAFU
Revenue to Cost Ratio	RVC
Sparta Hancock Development Authority	SHDA
Sandersville Railroad Company	SRC
Surface Transportation Board	STB
Standard Transportation Commodity Code	STCC
Uniform Rail Costing System	URCS

Appendices Attached separately

Appendix B: Expert Witness Qualifications

Appendix C: Inspection Photos

Appendix D: 20 Year Feasibility Projection

EXHIBIT
SRR 51

Original (on pages 4 and 29):

Cost Component	Cost
Main Line track 4.5 miles	$ 11,049,280.00
Highway 16 Crossing	$ 2,000,000.00
CSX Interchange Tracks	$ 3,~~610,000.00~~
Two Rail Bridges	$ 214,000.00
At-Grade Crossings	$ 231,441.00
Train Building Yard	$ ~~2,953,800.00~~
Land Acquisition	$ 568,561.00
Total Estimated Capital Costs:	**$ 20,627,082.00**

Errata:

Revised Capital Costs	
Cost Component	**Cost**
Main Line track 4.5 miles	$ 11,049,280.00
Highway 16 Crossing	$ 2,000,000.00
CSX Interchange Tracks	$ 3,066,380.00
Two Rail Bridges	$ 214,000.00
At-Grade Crossings	$ 231,441.00
Train Building Yard	$ 410,250.00
Land Acquisition	$ 568,561.00
Wetland Credits	$ 1,500,000.00
Total Estimated Capital Costs:	**$ 19,039,912.00**

SRC Sparta Operation Projection — Original (on pages 5, 40, and Appendix D)

	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028	Year 2044
PROJECTED CARLOADS:	3484	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06	$ 271.70
OPERATING REVENUES						
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398	$ 946,600
OPERATING EXPENSES						
MAINTENANCE OF WAY	$ ~~36,000~~	$ ~~37,440~~	$ ~~38,938~~	$ ~~40,495~~	$ ~~42,115~~	$ ~~78,880~~
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794	$ 87,645
TRANSPORTATION	$ ~~138,222~~	$ ~~143,751~~	$ ~~149,501~~	$ ~~155,481~~	$ ~~161,700~~	$ ~~302,861~~
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870	$ 82,167
OPERATING EXPENSES BEFORE D & A	$ ~~251,722~~	$ ~~261,791~~	$ ~~272,263~~	$ ~~283,153~~	$ ~~294,479~~	$ ~~551,554~~
EBITDA	$ ~~180,294~~	$ ~~187,506~~	$ ~~195,006~~	$ ~~202,806~~	$ ~~210,918~~	$ ~~395,046~~
OPERATING MARGIN	~~42%~~	~~42%~~	~~42%~~	~~42%~~	~~42%~~	~~42%~~
OPERATING RATIO	~~58.3%~~	~~58.3%~~	~~58.3%~~	~~58.3%~~	~~58.3%~~	~~58.3%~~
COST PER CAR	~~72.25~~	~~75.14~~	~~78.15~~	~~81.27~~	~~84.52~~	~~158.31~~
COST PER TON	$ ~~0.63~~	$ ~~0.66~~	$ ~~0.69~~	$ ~~0.71~~	$ ~~0.74~~	$ ~~1.39~~
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27	$ 2.38

Projected at Maximum Rate

Errata:

SRC Sparta Operation Projection

	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028	Year 2044
PROJECTED CARLOADS:	3484	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06	$ 271.70
OPERATING REVENUES						
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398	$ 946,600
OPERATING EXPENSES						
MAINTENANCE OF WAY	$ 45,200	$ 47,008	$ 48,888	$ 50,844	$ 52,878	$ 99,039
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794	$ 87,645
TRANSPORTATION	$ 145,508	$ 151,328	$ 157,381	$ 163,677	$ 170,224	$ 318,826
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870	$ 82,167
OPERATING EXPENSES BEFORE D & A	$ 268,208	$ 278,936	$ 290,094	$ 301,698	$ 313,765	$ 587,677
EBITDA	$ 163,808	$ 170,360	$ 177,175	$ 184,262	$ 191,632	$ 358,923
Capital Cost Debt	$19,039,012	$18,868,652	$18,691,477	$18,507,215	$18,315,583	$13,966,009
OPERATING MARGIN	38%	38%	38%	38%	38%	38%
OPERATING RATIO	62.1%	62.1%	62.1%	62.1%	62.1%	62.1%
COST PER CAR	76.98	80.06	83.26	86.60	90.06	168.68
COST PER TON	$ 0.68	$ 0.70	$ 0.73	$ 0.76	$ 0.79	$ 1.48
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27	$ 2.38

Original (on pages 5 and 39):

Mode(s)	Truck/ Transload Cost	Railroad 1 Cost	Railroad 2 Cost	Total Rate per ton
Truck entire route	$ 24.88			$ 24.88
Direct Rail using New RR + CSX charging maximum to recuperate capital costs		$ 1.09	$ ~~9.59~~	$ ~~10.68~~
Truck to Transload+CSX Direct	$ 1.09		$ ~~9.59~~	$ ~~10.68~~

Errata:

Heidelberg Transportation Options to ship 400,000 tons of aggregate per year to Savannah.

Mode(s)	Truck/ Transload Cost	Railroad 1 Cost	Railroad 2 Cost	Total Rate per ton
Truck entire route	$ 24.88			$ 24.88
Direct Rail using New RR + CSX charging maximum to recuperate capital costs		$ 1.09	$ 13.08	$ 14.17
Truck to Transload+CSX Direct	$ 1.09		$ 13.08	$ 14.17

Original (on page 20):

SRC Sparta Operation Costs		
	Year 1	
PROJECTED CARLOADS:	3484	
OPERATING EXPENSES		
MAINTENANCE OF WAY	$	~~36,000~~
MAINTENANCE OF EQUIPMENT	$	40,000
TRANSPORTATION	$	~~138,222~~
GENERAL AND ADMINISTRATIVE	$	37,500
OPERATING EXPENSES BEFORE D & A	$	~~251,722~~
COST PER CAR	$	~~72.25~~
COST PER TON	$	~~0.63~~

Errata:

Minimum Rate = Actual Cost of Railroad's Operation

SRC Sparta Operation Projection		
	Year 2024	
PROJECTED CARLOADS:	3484	
AVERAGE REVENUE PER CARLOAD:	$	77.00
OPERATING REVENUES		
TOTAL OPERATING REVENUES	$	268,268
OPERATING EXPENSES		
MAINTENANCE OF WAY	$	45,200
MAINTENANCE OF EQUIPMENT	$	40,000
TRANSPORTATION	$	145,508
GENERAL AND ADMINISTRATIVE	$	37,500
OPERATING EXPENSES BEFORE D & A	$	268,208
EBITDA	$	60
OPERATING MARGIN	$	0.00
OPERATING RATIO		100.0%
COST PER CAR		76.98
COST PER TON	$	0.68
RATE PER TON	$	0.68

Original (on page 21):

SRC Sparta Operation Projection	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028
PROJECTED CARLOADS:	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06
OPERATING REVENUES					
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398
OPERATING EXPENSES					
MAINTENANCE OF WAY	$ ~~36,000~~	$ ~~37,440~~	$ ~~38,938~~	$ ~~40,496~~	$ ~~42,116~~
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794
TRANSPORTATION	$ ~~138,222~~	$ ~~143,751~~	$ ~~149,501~~	$ ~~155,481~~	$ ~~161,700~~
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870
OPERATING EXPENSES BEFORE D & A	$ ~~251,722~~	$ ~~261,791~~	$ ~~272,263~~	$ ~~283,153~~	$ ~~294,479~~
EBITDA	$ ~~180,294~~	$ ~~187,506~~	$ ~~195,006~~	$ ~~202,806~~	$ ~~210,918~~
OPERATING MARGIN	~~42%~~	~~42%~~	~~42%~~	~~42%~~	~~42%~~
OPERATING RATIO	~~58.3%~~	~~58.3%~~	~~58.3%~~	~~58.3%~~	~~58.3%~~
COST PER CAR	~~72.25~~	~~75.14~~	~~78.16~~	~~81.27~~	~~84.52~~
COST PER TON	$ ~~0.63~~	$ ~~0.66~~	$ ~~0.69~~	$ ~~0.71~~	$ ~~0.74~~
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27

Errata:

Projected at Maximum Rate

SRC Sparta Operation Projection	Year 2024	Year 2025	Year 2026	Year 2027	Year 2028
PROJECTED CARLOADS:	3484	3484	3484	3484	3484
AVERAGE REVENUE PER CARLOAD:	$ 124.00	$ 128.96	$ 134.12	$ 139.48	$ 145.06
OPERATING REVENUES					
TOTAL OPERATING REVENUES	$ 432,016	$ 449,297	$ 467,269	$ 485,959	$ 505,398
OPERATING EXPENSES					
MAINTENANCE OF WAY	$ 45,200	$ 47,008	$ 48,888	$ 50,844	$ 52,878
MAINTENANCE OF EQUIPMENT	$ 40,000	$ 41,600	$ 43,264	$ 44,995	$ 46,794
TRANSPORTATION	$ 145,508	$ 151,328	$ 157,381	$ 163,677	$ 170,224
GENERAL AND ADMINISTRATIVE	$ 37,500	$ 39,000	$ 40,560	$ 42,182	$ 43,870
OPERATING EXPENSES BEFORE D & A	$ 268,208	$ 278,936	$ 290,094	$ 301,698	$ 313,765
EBITDA	$ 163,808	$ 170,360	$ 177,175	$ 184,262	$ 191,632
Capital Cost Debt	$19,039,012	$18,868,652	$18,691,477	$18,507,215	$18,315,583
OPERATING MARGIN	38%	38%	38%	38%	38%
OPERATING RATIO	62.1%	62.1%	62.1%	62.1%	62.1%
COST PER CAR	76.98	80.06	83.26	86.60	90.06
COST PER TON	$ 0.68	$ 0.70	$ 0.73	$ 0.76	$ 0.79
RATE PER TON	$ 1.09	$ 1.13	$ 1.18	$ 1.22	$ 1.27

Original (on page 34):

CSX Portion Only	Total RR Cost per Ton	Fuel Cost	Labor: Crew, Dispatch, Clerical	Road Locomotive	Yard & Industry Switching	Track & RoW	Rev/Cost Ratio	RR Rate	Total Miles	Round Trip Transit Days
Sparta to Savannah	~~$4.79~~	~~$0.90~~	~~$1.42~~	~~$0.64~~	~~$0.19~~	$ 1.65	2.00	~~$9.59~~	195.4	~~2.8~~
Sparta to Jacksonville	~~$8.84~~	~~$1.67~~	~~$2.38~~	~~$1.18~~	~~$0.19~~	$ 3.06	2.00	~~$16.95~~	341.3	~~3.1~~
Sparta to Canadys	~~$5.57~~	~~$0.98~~	~~$1.31~~	~~$0.56~~	~~$1.23~~	$ 1.48	2.00	~~$11.15~~	179.6	~~3.1~~
CSX	~~$3.61~~	~~$0.64~~	~~$0.96~~	~~$0.46~~	~~$0.37~~	$ 1.18			139.5	~~2~~
H&B	~~$1.97~~	~~$0.34~~	~~$0.35~~	~~$0.11~~	~~$0.87~~	$ 0.30			40.1	~~1.1~~

Errata:

Costs to move in 16-car blocks

CSX Portion Only	Total RR Cost per Ton	Fuel Cost	Labor: Crew, Dispatch, Clerical	Road Locomotive	Yard & Industry Switching	Track & RoW	Rev/Cost Ratio	RR Rate per Ton	Total Miles	Round Trip Transit Days
Sparta to Savannah	$ 6.54	$ 0.79	$ 1.32	$ 0.80	$ 1.97	$ 1.65	2.00	$ 13.08	195.4	6.2
Sparta to Jacksonville	$ 9.94	$ 1.46	$ 2.04	$ 1.40	$ 1.97	$ 3.06	2.00	$ 19.87	361.9	6.8
Sparta to Canadys	$ 7.54	$ 0.90	$ 1.29	$ 0.73	$ 3.13	$ 1.48	2.00	$ 15.08	179.6	6.8
CSX	$ 4.62	$ 0.56	$ 0.86	$ 0.55	$ 1.47	$ 1.18			139.5	4
H&B	$ 2.91	$ 0.34	$ 0.43	$ 0.18	$ 1.66	$ 0.30			40.1	2.8

New errata:

Truck Carloads for Transload Option			
Period	**Tons**	**Truckloads (23 tons/)**	**One-Way Moves**
Annually	400,000	17391	34783
Weekly (52 weeks)	7692	334	669
Daily (365 days)	1096	48	95