

March 17, 2022

Dave Navecky

Acting Deputy Director

Office of Environmental Analysis Surface Transportation Board

395 E Street SW

Washington, DC 20423 202-245-0294

Re: STB Finance Dockets No. 36524 and 36525; and a Request to Withhold Approval

March 16, 2022

Dear Director Navecky,

Members of the all-volunteer civic group Utah Citizens Advocating Renewable Energy (UCARE) urge you to

withhold approval of the two Finance Docket requests filed by Savage Tooele Railroad Company (STR) and

Savage Companies (Savage) in September 2021 to acquire, construct, and operate rail service supporting the

Lakeview Business Park proposed by the Romney Group in Tooele County, Utah. The STR-Savage proposed actions via FD 36524 and FD 36525 pose such potentially significant threats to the natural and human environments as to warrant preparation of an environmental assessment or environmental impact

statement under the National Environmental Policy Act (NEPA).

The proposed rail line acquisition, construction, and operation actions for which STR-Savage seeks regulatory exemptions would likely:

- ~ cause physical damage to protected wetlands adjacent to the Great Salt Lake;
- ~ disturb wildlife habitat and migratory bird flyways of hemispheric importance;
- ~ degrade water and air quality locally and across the Great Salt Lake ecosystem;
- ~ disrupt residential neighborhoods through which rail and rail traffic would pass;
- ~ burden area taxpayers with unplanned infrastructure and public safety costs; and,
- ~ multiply damages by promoting further residential, industrial, and commercial development.

Furthermore, UCARE recognizes that the development activities for which STR-Savage seeks the STB's

exemptive approval are an integral part of attempts to establish a satellite port complex in Tooele County as a

key component of the Utah Inland Port Authority (UIPA) network of import-export logistical, manufacturing,

and warehouse port facilities. As UIPA's central port hub in Salt Lake City continues to face growth obstacles,

such as probable non-attainment status under the Clean Air Act, we expect more UIPA network development

and operations to shift to the Tooele County facilities STR-Savage plans to support.

We urge the STB to fully investigate the range of harmful impacts a "green light" to STR-Savage would generate. The interests of Tooele County's natural and human environments would be best served if you withhold approval of the STR-Savage requests in FD 36524 and FD 36525 until an EA or EIS has been conducted.

Thank you,

Larry Dean

Sierra Club