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ROMNEY GROUP

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March 27, 2022

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ENTERED
Office of Proceedings
March 28, 2022
Part of
Public Record

Re: Finance Docket 36524, Savage Tooele Railroad Company – Acquisition and Operation Exemption in Tooele County, Utah

Dear Ms. Brown:

I am the managing partner of The Romney Group, which has assembled and developed the 1,700 acre logistical and manufacturing property in Grantsville, UT, known as the Lakeview Business Park. We have coordinated with Savage Companies to provide shortline rail operations serving our park. I am writing in response to the coordinated effort of a few groups to distort the facts of this proposed rail project in Grantsville, UT.

The following points have been misconstrued in various letters to the STB, which I hope to set straight with the following facts:

- 1. The Impact to the Great Salt Lake and Wetlands:** The proposed rail project is located entirely to the east of both an existing rail line and Interstate I-80 (the Great Salt Lake is located on the west side of the freeway and Union Pacific's mainline rail). The proposed Savage shortline will operate on an existing rail line that was operated by Union Pacific. There are a few sections of rail line that will need to be reconstructed, but these sections have no wetlands present.
- 2. Environmental Approvals:** Savage Tooele Railroad (STR) has complied fully with all environmental diligence and reporting requirements in the STB proceeding. Importantly, in a November 12, 2021 supplemental filing with the Board, STR itself, on its own and based on its own investigation, alerted the STB to the fact that Tooele County is a "non-attainment" area under the Clean Air Act, after STR had misstated that fact in its initial application. (This was before any other party had mentioned non-attainment in comments.) As a result, following guidance in STB regulations, STR committed that it would operate fewer than three trains per day in its proposed rail operation, versus fewer than eight per day as stated in the initial application. Furthermore, we understand and believe that STR is prepared to provide any additional environmental information or reporting that the STB may require in connection with its proposed rail operation.
- 3. Air Pollution:** Opponents claim that rail will increase air pollution. This project has already been entitled for 25M sq ft of industrial usage. Without rail this project will be served entirely by truck. Rail is a much friendlier environmental option and Savage is working with the state to try

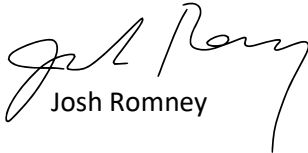
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to secure funding for a tier 4 locomotive and will at a minimum utilize a tier 2 locomotive. Furthermore, we anticipate that many of the people currently commuting from Tooele County to Salt Lake County will work at the park, saving thousands of commuting hours per day.

4. **Unemployment/Economic benefit:** The City of Grantsville overwhelmingly supports the project as it provides a necessary commercial tax base for a city that has increasingly become a bedroom community to the Salt Lake Valley. It is estimated that over 80% of Tooele County residents work outside the county. The rapid residential growth of this area has left the schools severely underfunded. Zions Bank Public Finance estimates that at full build out this project will generate \$60 million a year in property tax for the local schools and taxing entities.

We have done our best to work with the local governing authorities and to provide accurate information to any group that has reached out to us. To date, not one of the groups that has written opposition letters to this project has reached out to us and asked for information. We have had numerous public meetings with both the County and City over the past four years. Not once has an individual or group expressed opposition to this project. Outside interest groups are trying to portray that they represent the citizens of Tooele County and Grantsville City, which simply is not accurate. Please let us know if we can provide any additional information.

Thank you,



Josh Romney

Cc: Parties of Record

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