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November 6, 2023

VIA E-MAIL

Ms. Danielle Gosselin
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street, N.W.
Washington, D.C. 20423

RE: STB Docket No. FD 36616, *Savage Tooele Railroad Company –
Construction and Operation Exemption – Line of Railroad in Tooele
County, Utah*

Dear Ms. Gosselin:

The Savage Tooele Railroad Company (“STR”), petitioner in this proceeding, hereby submits this response to the letter submitted to the Office of Environmental Analysis (“OEA”) by the Utah Physicians for a Healthy Environment and several other organizations on October 30, 2023 (“Utah Physicians Letter”). The Utah Physicians Letter responds to OEA’s request for comments on the Draft Environmental Assessment (“Draft EA”) issued for the proposed project on September 29, 2023. The Utah Physicians Letter contains a number of misstatements of key facts concerning the project and its potential environmental impacts.

Specifically, the Utah Physicians Letter is wrong in stating that the purpose and scope of STR’s project has been expanded to include providing rail service to entities other than tenants of the Lakeview Business Park, namely a potential second industrial development that, if constructed, would be located on a 162.74-acre parcel in the vicinity of STR’s track. This is simply not the case. In stark contrast to the Lakeview Business Park, which has received all required permits and where facilities are being constructed that will require rail service from STR immediately upon its track’s construction, the second project mentioned in the Utah Physicians Letter is only conceptual. Accordingly, references to STR in the Utah Inland Port Authority’s Draft Tooele Valley Project Area Plan, cited in the Utah Physicians Letter, should not be misconstrued to infer that STR has plans to serve that development or any new or existing businesses outside the Lakeview Business Park.

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STR's affiliate Savage Services has previously had limited discussions with the sponsors of the other development mentioned in the Utah Physicians Letter, at their request, but those discussions are not ongoing. Indeed, STR believes the proposed project would have to overcome permitting, utility, and environmental challenges, and that even if it proceeds it may not be rail-served. Consequently, STR is focused on preparing to construct its proposed rail line to serve tenants of the Lakeview Business Park as described in its Petition for Exemption once final approval from the Board is received.

In summary, the fundamental underlying premise of the Utah Physicians Letter - that STR's "entire purpose . . . would be to serve two new proposed industrial zones"¹ - is inaccurate as STR's intent is only to serve the Lakeview Business Park. As such, the letter's assertions about the potential environmental impacts from daily truck trips, emissions by trucks and locomotives, pollution, degradation of quality of life, etc., are all significantly overstated and not based on actual facts. There is no reason for OEA to analyze the potential impacts of a development project that is not part of STR's plans, is only conceptual, and may never receive approval from the relevant state and federal authorities.

Please don't hesitate to contact me if you have any questions or desire additional information.

Sincerely,



Attorney for Savage Tooele Railroad Company

Cc: Ms. Andrea E. Poole

¹ Utah Physicians Letter at page 8 (among other references to two industrial parks).