

June 11, 2004

Phillis Johnson-Ball
Section of Environmental Analysis
Case Control Unit
STB Finance Docket No. 34075
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423-0001

Dear Phillis Johnson-Ball:

I appreciate the opportunity to provide comments regarding the proposed short-line railroad from the Juab siding area near Levan to the Salina area in central Utah. I have reviewed the Final Scope of Analysis and are generally very supportive of the process, procedure explained. I do have a few significant comments of that I ask you to consider.

Regarding Sea 34582 dated May 14, 2004
Section #4 Water Resources, response section.

I would respectfully request that in addition to "The EIS will consider mitigation..." that the words "avoidance and minimization" be included to further define the measures available to reduce the possible impacts on Water Resources. As a member of the agricultural technical committee I have worked extensively with private land owners as we have identified and purpose a possible alignment that avoids and minimizes impacts on private land owners, agriculture operations and is realistic to engineer and operate. In your "responses" sections under the Redmond WMA "avoidance and minimization" are listed along with "mitigation" to deal with potential impacts. I respectfully request the same consideration for people in agriculture who represent a larger number of landowners.

Regarding Alternative B.

1. The northern section of alternative B from its initiation point at the preferred alternative south to highway 50 would impact a number of irrigation systems and some farmland. It would also impact 2-3 homes on the east side of the canal. Alternative C would only impact one home on the west side of the canal. Alternative C alignment on the west side of the canal would avoid most of the irrigation systems and all farm land. This is a workable portion of alternative B if it terminates at highway 50, but alternative C is a much better proposal than this portion of B.

2. The southern section of Alternative B from Highway 50 to Lost Creek will severely impact a large number of agricultural fields and farm families. The farmland in this area is some of the best in the valley and has been identified as "Prime". In the area the slope of the land would likely dictate the alignment would bisect the fields in a triangular pattern and would not likely follow existing section lines and field boundaries to minimize impacts. This would cause most fields to be fragmented into triangular shapes that are very, very difficult to farm and eliminates farm machinery efficiencies associated with large square fields. I also question the wisdom in considering this portion of B from an engineering perspective. There is a significant grade changes from the Highway 50 area of alternative B to the Lost Creek load-out. This will likely greatly increase the cost of operation for trains to navigate the grade. Organized opposition from the agriculture community, farm organizations and some elected officials would very likely occur due to the importance of this farm land and the numbers of families impacted. There are also at least 2 homes and a dairy replacement heifer operation that would also be seriously impacted by alternative B.

Regarding Alternative C.

This is the best alternative on the southern portion of the short line railroad. It avoids and minimizes most impacts on agriculture and residential dwellings as long as the final alignment stays on the west side of the canal. A load out facility located at the end of alternative C near highway 50 would avoid and minimize

most impacts on agricultural land. It also impacts the least amount of wetland. Based upon my review of the maps the alignment could be located much closer to the west side of the canal than it is currently shown on the maps to further reduce construction and operations costs and fragmentation of range land. It is also the alternative that landowners would most likely support. Those attending the public scoping meeting proposed this alternative. However it would eliminate the potential for rail access to the Salina Industrial park, which is not supported by the Sevier County Commission or SUFCO.

Please contact me if you need more specific information and numbers to further define these comments. I look forward to continued involvement in this project. As you know my interest is to seek to design an affordable short line railroad that avoids and minimizes impacts on agricultural land owners, wetlands and other significant environmental considerations. This project is intended to retaining the businesses, jobs and taxbase in the region by providing a safer more affordable transportation system for coal and other bulk commodities.

Sincerely,

Jody A. Gale
Area Agent
Utah State University Extension Service