

March 17, 2022

David 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

Dear Director Navecky:

Utah Physicians for a Healthy Environment (UPHE) is a public health advocacy group of over 400 physicians and 3,000 members of the lay public. We are concerned about public policy that has the potential to be harmful to public health in Utah and the Western United States. We write in opposition to any move by the STB to abbreviate or skip the normal federal approval process that would be required for the Romney/Savage railway proposed for Tooele, Utah.

Inherent to good government is public policy that prioritizes the public interest over private interests. Indeed, that may be the very definition of good government. An obvious corollary is good government is undermined by policy that sacrifices the public interest in favor of private interest. That is what is at issue with the appeal by Savage Companies and Savage Tooele Railroad Company (STR) to persuade the STB to grant them a “green light” for exempting them from the NEPA process in constructing a rail service to support the Lakeview Business Park proposed by the Romney Group in Tooele County, Utah.

There is certainly no acute or looming deficiency of railway services in Tooele County that warrants the STB granting a regulatory exemption from the normal NEPA process. In this case, the interests of the Romney Group and Savage are clearly at odds with the greater public interest for these reasons.

1. Railway related emissions are substantial. One diesel Tier 0 or Tier 0+ train diesel locomotive (what is commonly used in Utah) can emit as much pollution (particulate and nitrogen oxides) as up to 10,000 cars. As part of the Wasatch Front airshed, Tooele is already in an area that chronically violates the EPA’s air quality standards (NAAQS) for both PM2.5 and ozone.

In Utah pollution levels are now consistently on the rise, both ozone and PM2.5, because of hotter atmospheric temperatures from the climate crisis, and from worsening wildfire pollution that now plagues the Western United States for about five months of the year.

Furthermore, current NAAQS are themselves recognized by public health experts and virtually every relevant medical organization as far too lax. We expect the EPA under the Biden Administration will tighten both of those standards.

2. Utah has the lowest unemployment rate in the nation. In Dec. 2021 it was 1.9%, not only the lowest rate in the nation, but the lowest rate in Utah history. Utah is hardly in need of an economic stimulus that STR's actions might facilitate. This infrastructure would promote exactly

the type of employment that Utah does not need, i.e. low wage warehouse and non-union, heavy industry jobs. Who then would be the primary beneficiary of the Savage railway proposal? Savage and the Romney Group, not the citizens of Utah.

3. The Savage/Romney project is an integral part of the Utah Inland Port, which numerous public interest and environmental groups are fighting because it will be a significant new source of air pollution in the heavily urbanized Salt Lake Valley, and is tied to a business model of extracting more fossil fuels from the state, clearly exacerbating the climate crisis. To that extent, Savage is already heavily invested in activity that exacerbates the climate crisis as a major hauler of coal, and through its support for oil and gas drilling. Utahns have no guarantee that Savage/Romney would not use its Tooele County infrastructure for fossil fuels transport and storage.

4. There is wide spread public opposition to the Utah Inland Port by the citizens of the Salt Lake Valley, and to the Salvage/Romney rail terminal by the citizens who live in the adjacent community of Erda. Many of them live in Erda precisely because of its rural atmosphere and character, which would obviously be turned on its head by a huge new railway line and terminal.

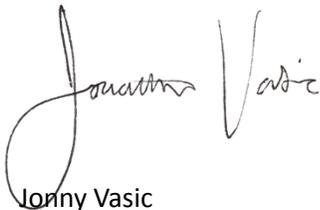
5. There is little question that the proposed railway will cause physical damage to critical, protected wetlands adjacent to the Great Salt Lake. In doing so it will harm the migratory bird flyways that are of hemispheric importance.

UPHE joins many other groups in urging the STB to prioritize the public interest in evaluating this project. If it does so, it should conclude that the project is not in the public interest, and at the very least, there is no justification for “greenlighting” an accelerated evaluation, or skipping the usual NEPA process.

Sincerely,

Brian Mauch, MD.

*President
Utah Physicians for a Healthy Environment*



*Jonny Vasic
Executive Director
Utah Physicians for a Healthy Environment*