

## Utah Inland Port Authority Board 2024

### APPROVED MEETING MINUTES

Utah Inland Port Authority Board Meeting Minutes  
Monday April 29, 2024  
9:00 am  
Utah State Capitol, Room 445  
350 State Street, Salt Lake City, UT 84103

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Board Members Present: Ryan Starks, Abby Osborne, Jonathan Freedman, Jefferson Moss  
Non-Voting Board Members Present: Bill Wyatt, Joel Ferry, Victoria Petro  
Board Members Absent: Jerry Stevenson

UIPA Staff: Ben Hart, Benn Buys, Larry Shepherd, Lynne Mayer, Stephen Smith, Carol Watson, Mona Smith, Scott Wolford, Danny Stewart, Kaitlin Felsted, Allen Evans, Stephanie Pack, Jenna Draper, Amy Brown Coffin

Others in Attendance: Donald Ludlow, Brook McCarrick, Ken Kraus, Allan Murphy, Rhonda Lauritzen, Deeda Seed, Sarah Buck, Mary Martin, Michelle White, Barbara McConvill, Jen Hart, Andy Hulka, Joan Gregory, Ann Floor, Jaime Hernandez, Heather Dove, Scott Drumm, Joy Peters, Brooke Larsen, Ann Florence, Nick Tarbet, Richard Monson

1. **Welcome**

UIPA Board Chair, Abby Osborne, welcomed the board members, staff and public to this Utah Inland Port Authority Board Meeting.

2. **Approval of Minutes, March 26, 2024 Board Meeting**

Board member Moss moved to approve the minutes from the March 26, 2024, 2024 board meeting. Board member Starks seconded the motion. The motion was approved unanimously.

3. **Executive Director Report**

UIPA Executive Director Ben Hart provided an executive director's report, clarifying the timeline of activity on the proposed west Weber County project area, existing land entitlement in the proposed project area, and the additional protections for sensitive areas there that will be available under an inland port project area - including dedicated

funding from tax revenues for wetlands protection. He spoke of the port authority pursuing grant funding under the federal EPA Clean Ports Program for zero emissions equipment. He mentioned recent open houses held by the port in Iron County and the west side of Salt Lake City to invite public interaction and input in the development of the statewide logistics strategy.

Jenna Draper, Associate Vice President for Regional Project Area Development gave an update on activity in the Verk Industrial Park Project Area.

Allen Evans, Executive Vice President of Logistics, highlighted the recent ribbon cutting event for Holcim Building Envelope's new facility in the Northwest Quadrant, which represents a commitment to sustainable development and leverages the advantages of intermodal rail to remove more trucks from Utah's roadways.

5. **Presentation: Statewide Logistics Strategy development update**

Donald Ludlow, Vice President for CPCS, provided an update on the logistics strategy plan under development, saying that Utah's logistics system is in a strong position to meet current and near-term needs. Utah's strengths include strong multimodal infrastructure, location as a freight hub between east and west, and increasingly between north and south (Canada and Mexico). To sustain the competitiveness of Utah's logistics system the state must address challenges of a growing population and increasing demand for logistics services, housing affordability, shortages of international shipping containers, and a declining share of freight moved by rail in Utah and nationally. Utah's modes of freight transportation include 84% of cargo tonnage moving by truck, 9% by rail, less than 1% by air cargo, and 6% using multiple modes of transportation. E-commerce consumption has grown by 276% in the last 9 years, requiring new local facilities to support rapid order delivery consumers desire. This has driven rapid warehousing and distribution center development in the state, with the NWQ as the hub of this activity. Within the NWQ 32% of the land is developed, another 54% is vacant and can be developed. Donald reviewed the logistics roles of the various inland port project areas and spoke of next steps in the logistics strategy development.

6. **Presentation: Amendment to Twenty Wells Inland Port Project Area Plan**

Stephanie Pack, Associate Vice President, Regional Project Area Development, shared that the inland port was approached by Grantsville City which had passed a resolution to amend the Twenty Wells project area to include a parcel of land they call the Broken Arrow zone, west of Grantsville. This area is roughly 145 acres of rail-served industrial land. The focus of recruitment for this land would be light industrial, advanced manufacturing, and air-cooled data centers. A wetlands delineation study will be conducted and areas identified will qualify for enhancement and protection under UIPA policy.

7. **Policy Presentations**

Amy Brown Coffin, Chief Risk & Compliance Officer, presented the review and minor revisions for the following policies.

**BP-10 - Records Retention**

**BP-12 - Segregation of Duties**

**BP-14 - Board Governance**

**BP-15 - Code of Conduct**

**BP-16 - Public Infrastructure Districts (PID)**

8. **Presentation: Proposed Verk Public Infrastructure District**

Benn Buys, Deputy Director & Chief Financial Officer, introduced the proposal to create a public

infrastructure district for the Verk Industrial Park project area. Spanish Fork City is the applicant for the PID. The PID will help fund public infrastructure and improvements (power, wastewater lift stations, rail crossings, other utilities) for 8.5 million square feet of industrial buildings planned.

9. **Presentation: Authority Infrastructure Bank Loans**

Benn Buys discussed the four Authority Infrastructure Bank (AIB) loans that have come to the board with the recommendation from the AIB Loan Approval Committee.

AIB lending is authorized under Utah Code 11-58-106 and 63A-3-4. Of the \$65 million appropriated to the AIB, there are \$10 million in loans outstanding and \$57 million available, with \$22.3 million requested.

These loans can be used for infrastructure projects including an inland port, intermodal facilities, sewer, electricity, roads, and water systems. Infrastructure loans bear interest at a rate not to exceed .5% above bond market interest rates available to the state and the loans are administered and serviced by the Stater Division of Finance. With UIPA board approval, these loans will be presented to the Executive Appropriations Committee of the Legislature for final approval.

**Savage Transload Network Tooele**

\$2.4 million loan for 10 years at 3.04% interest. To be used for Tooele Railport expansion, one rail-to-truck or truck-to-rail transload track, doubling existing transload capacity, one conveyor, and three transload racks. Repayment will be from company funds including new revenue from the facility.

**Savage Transload Network Iron County**

\$5 million loan for 10 years at 3.04% interest rate. To be used for 4 rail-to-truck or truck-to-rail transload tracks with approximately 100 railcar spots, a switching lead track which will allow the Railport to sort cars delivered by Union Pacific, and 15 acres of improved property, including 2 acres of dimensional product laydown area. Repayment will be from company funds including new revenue from the facility.

**Spanish Fork City**

\$10 million for a maximum of one year at 3.47% interest rate. To be used for (\$3 million) regional sewer lift station, (\$2 million) easements and materials for 138 KV power line, (\$4 million) land right of way acquisition for roads. Repayment of the short-term loan will be from a \$50-\$70 million bond on tax differential to the public infrastructure district.

**Zenith Bolinder**

\$4.875 million for one year at 3.47% interest rate. To be used for installation of a water system, tank, pump station, well/water system, wastewater treatment system, roads, and power plant. Repayment will be from a \$30 million bond on tax differential and mill levy to the public infrastructure district.

10. **Presentation: Resolution 2024-05 Trigger Resolution for Mineral Mountains Project Area**

Benn Buys presented this resolution setting the initial trigger date for collection of tax increment funds on a single parcel, the Minersville Zone, in the Mineral mountains project area. The parcel has a 27,000 square of a building that was built for a fertilizer production facility which converts farm animal waste into pellets that are used for fertilizer.

11. **Presentation: Resolution 2024-06 Amendment to Salt Lake City Interlocal Agreement**  
Ben Hart presented this resolution and detailed the amendment to the Interlocal Cooperation Agreement between UIPA/Salt Lake City Corporation and the Redevelopment Agency of Salt Lake City. The interlocal agreement enables the participating entities to more closely work together to use the tax differential together in ways that mutually benefit the Northwest Quadrant.

12. **Public Comment**

Board Chair Osborne opened up the public comment period and invited those in the room to submit comment cards for an opportunity to speak. She reminded all that the port welcomes written public comment anytime via the UIPA website at

<https://inlandportauthority.utah.gov/contact/>.

Comments made included an expression of support for the amendment to the Twenty Wells Inland Port Project Area, concerns over the proposed Weber County Inland Port Project Area, urging the completion of the impact studies called for in the original UIPA/SLC interlocal agreement, and the delivery of a petition in opposition to the Weber County project area with 1515 signatures (10% of signatures from Weber County).

13. **Approval of Policies BP-04 - Project Area & Property Tax Differential and BP-11 - Personnel**

Board member Moss moved to approve policies BP-10 and BP-12 as presented. Board member Starks seconded the motion.

The motion passed with a unanimous vote of all board members present.

14. **Approval of Authority Infrastructure Bank Loans  
Savage Transload Network - Tooele County Transload Expansion**

Board member Starks moved to approve an infrastructure loan from the inland port authority revolving loan fund of \$2.4 million to Savage Transload Network with terms of the loan being 10 years at 3.04 percent interest rate, payable in 10 annual payments. Board member Moss seconded the motion.

The motion passed with a unanimous vote of all board members present.

**Savage Transload Network - Iron County Transload**

Board member Moss moved to approve an infrastructure loan from the inland port authority revolving loan fund of \$5 million to Savage Transload Network with terms of the loan being 10 years at 3.04 percent interest rate, payable in 10 annual payments. Board member Starks seconded the motion.

The motion passed with a unanimous vote of all board members present.

**Spanish Fork City Project Area Infrastructure**

Board member Starks moved to approve an infrastructure loan from the inland port authority revolving loan fund of \$10 million to Spanish Fork City with terms of the loan

being one year at 3.47 percent interest rate, payable in one year.  
Board member Moss seconded the motion.

The motion passed with a unanimous vote of all board members present.

**Zenith Bolinder - Project Area Infrastructure**

Board member Moss moved to approve an infrastructure loan from the inland port authority revolving loan fund of \$4.875 million to Zenith Bolinder with terms of the loan being one year at 3.47 percent interest rate, payable in one year.  
Board member Starks seconded the motion.

The motion passed with a unanimous vote of all board members present.

**15. Adoption of Resolution 2024-05, Trigger Resolution for Mineral Mountains Project Area**

Board member Starks moved to adopt Resolution 2024-05, Trigger Resolution for Mineral Mountains Project Area. Board member Moss seconded the motion.

The motion passed with a unanimous vote of all board members present.

**16. Adoption of Resolution 2024-06, Amendment to Salt Lake City Interlocal Agreement**

Board member Moss moved to adopt Resolution 2024-06, Interlocal Cooperation Agreement Amendment Between Salt Lake City Corporation, Redevelopment Agency of Salt Lake City and the Utah Inland Port Authority. Board member Starks seconded the motion.

The motion passed with a unanimous vote of all board members present.

**17. Closed Session**

At 10:36 am the board voted to move into a closed session meeting held in room 445 of the Utah State Capitol, 350 State Street, Salt Lake City, Utah 84103, and via electronic meeting, for the purpose of a “strategy session to discuss the purchase, exchange, or lease of real property,” as allowed and described in Section 52-4-205 of Utah Code and sections 52-4-204 of the Open and Public meetings act. Board member Starks made a motion to move into closed session. Board member Moss seconded the motion.

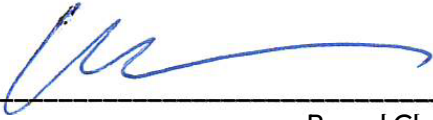
Vote:

Jefferson Moss – yes  
Ryan Starks – yes  
Abby Osborn – yes  
Jonathan Freedman – yes

Closed session ended at 11:30 am.

**18. Adjourn**

Board Chair Osborne adjourned the meeting immediately following the closed session.



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Board Chair, Abby Osborne

**Written Public Comments submitted during and after the meeting:**

**The petition below was delivered to the Utah Inland Port Authority board during the public comment period of the meeting.**

Abby Osborne  
Senator Jerry  
Stevenson Rep.  
Jefferson Moss  
Ryan Stark  
Jonathan Freedman

Council Member Petro  
Bill Wyatt, Executive Director, Salt Lake City Airport  
Joel Ferry, Director, Department of Natural  
Resources

April 29, 2024

To the Board of the Utah Inland Port Authority:

We have many concerns about the two proposed Inland Port Project Areas in Weber County between the Harold S. Crane Waterfowl Management Area and the Ogden Bay Waterfowl Management Area, and on the Weber River. We ask that you oppose creating these project areas.

Great Salt Lake is in dire straits, thus the west Weber County area requires a new approach to conservation and development. We should not incentivize massive industrial development on the shores of Great Salt Lake, in an area containing some of the last remaining wetlands in northern Utah.

The perceived economic benefit pales in comparison to the public harm that will be caused from:

Increased air pollution

Industrial development and inland ports create significant amounts of truck and rail traffic, increasing emissions. In some areas of the country, they are called "diesel death zones." Northern Utah is not in attainment of federal air quality standards and this proposed industrial development will make that worse. For comparison, developers of a 1,300 acre project area in Tooele County estimate over 50,000 additional vehicle trips per day (even with a "rail" component), the proposed Weber County project areas are 8,993 acres, or almost 7 times bigger. Rail also contributes to air pollution, with switcher engines being a significant factor.

Enabling development of an inland port that will increase air pollution is not in the public's interest. Based on a study by BYU, the total annual health costs from air pollution in Utah have been estimated from \$1.8 billion to \$7.2 billion.

**Before this proposal moves forward and public resources are given to it, a traffic study must be completed. Northern Utahns need to know how many trips will be generated by the Weber County location and what the consequences of that traffic will be.**

Destruction of Wetlands and harm to the Great Salt Lake ecosystem:

Wetlands help reduce water and air pollution and are vital to a healthy ecosystem. Great Salt wetlands support millions of migratory birds, from hundreds of species. Industrial development destroys wetlands and the surrounding environment, creating a cascading series of environmental harm, such as water pollution, water depletion and habitat loss. The Great Salt Lake ecosystem, including the areas slated for development in Weber County, provide important habitat for migratory birds and other wildlife. Numerous species of birds are facing threats which could warrant Endangered Species Act listings, and if the proposed Weber County inland port locations are developed, the threats these birds face will increase.

**Before any public resources are expended on this proposed development a comprehensive independent wetlands study needs to be conducted to fully assess the impact to the ecosystem, along with a Human Health Risk Assessment.**

Respectfully,

1,515 people

**Pat Annoni - Midvale - 4/25/2024**

Inland Port in Weber County

Please consider the 8,000 acres of wetlands your plan threatens!

Please show consideration for Mother Nature and for Weber County's population!

**Randall LaLonde - Salt Lake City - 4/26/2024**

Opposed to Weber County Port Authority Creation

I want to express my opposition the proposed Weber County Port Project. How can you save the Great Salt Lake when you destroy 8,000 acres of wetlands adjacent to it? Healthy wetlands are crucial to a healthy lake bed. I haven't even mentioned all the pollution that the creation of the Port will make, nor the degraded air quality that all the vehicles serving the Port will create.

**Sasha Mader - Salt Lake City - 4/26/2024**

Port

Please protect the 8,000 acres of wetlands in Weber county. The dangers of not protecting them would be long lasting and add to all the negative environmental impacts we are having on our beautiful state. My vote and dollars support those who support our health and environment.

**Jane Perkins - Loveland, CO - 4/26/2024**

The proposed Weber County Inland Port Project Areas represent an untenable trend in which environmental and public health issues are overridden by the lure of economic development. The Weber County project, should it reach its intended dimensions, would expand over an astounding 8966 acres of land and wetlands adjacent to the Great Salt Lake. A project of this magnitude and in this location—between the Harold S. Crane Waterfowl Management Area and the Ogden Bay Waterfowl Management Area—will cause tremendous harm. The ecological peril we face with declining Great Salt Lake water levels and ecosystem collapse, loss of wetlands, air quality problems, population growth, and pollution demonstrate that this project is not in the public's interest and shouldn't receive public subsidies through designation as an inland port project area. MORE HARM to the Great Salt Lake ECOSYSTEM, and DESTRUCTION OF VITAL WETLANDS in Weber County. DANGEROUS AND INCREASED AIR POLLUTION and HARM TO PUBLIC HEALTH!

I STRONGLY OPPOSE THIS WEBER COUNTY INLAND PORT PROJECT!

**Ivan G Weber - Salt Lake City - 4/27/2024**

Environmental impacts of Inland Port proposal

Wetlands destruction is only one of several categories of environmental impacts that will occur. Please be advised that the photo displayed on the Inland Port website --- showing wetlands plants apparently in fall or winter season, with seed plumes in full productivity --- are actually



Phragmites, an extremely invasive plant to which nearly all wildlife are not adapted! Phragmites, while biologically productive, are abject failures for wildlife in true ecosystems.

Other plants are possible as substitutes for Phragmites, particularly when propagated as communities of wetland plants, including microbiological members of those ecosystem communities. Bulrush, reeds, and a number of native species are far more legitimately encouraged for growth in wetlands at many depths, functioning far better at removal of excessive nutrients.

Removal of runoff fuels, hydrocarbons, plastics, and PFAS ("forever chemicals") are quite another category of problems. The Inland Port Authority bears a serious responsibility to the public to provide and perform adequate, legitimate sciences initially, during all operations and into the distant future, regardless of cost. The alternative to those sciences can only be adequate funding and bonds to facilitate citizen-managed authorities to plan, manage and interpret data as required.

Scale, implied breathtakingly by the 13 or 14 square miles represented in the current proposal for the project, is nearly impossible to make "sustainable"! LEED-certification (I am a 'LEED-Accredited Professional', myself, so I do believe that LEED has a place in sustainability planning and execution for built-environment planning, design and construction) does not accomplish the climbing of this nearly-insurmountable summit.

#### **Bruce Alan Reitz - Salt Lake City - 4/27/2024**

##### **NO INLAND PORTS**

Inland port authority board members, the Salt Lake Valley struggles with clean air. Pollution from trucks and cars adds tremendously to the pollution of the air we breath. Citizens with respiratory diseases in the valley suffer because of the already polluted air. We can't continue to add to the problem by increasing the number of big trucks passing through the valley. I have not talked to one citizen who is in favor of these inland ports. I think it is time that your board listen to the people of the state and abandon these inland port plans. Taxpayer money should not be spent of projects that benefit special interest groups. By moving forward with these projects you are wasting valuable tax monies that the people of the state need in education and other areas that benefit the citizens of this great state.

Please abandon this foolish project and lets not foul our air further to put money in the pockets of a few intitled individuals.

#### **Ann Florence - Cottonwood Heights - 4/29/2024**

Submitted during April meeting

I am blessed to live where I can escape the noise of I-215 and city traffic and walk along a creek, wander through tall trees, see an unobstructed view of Twin Peaks, and refresh my soul.

In the late 1950s, my family moved from beautiful North Logan (which I loved as only a child can) to Ventura, California, just before that little beach town's population skyrocketed. We Utahns like to put down California, but I am profoundly grateful that in 1972, people saw their fragile coastline threatened by unchecked development and took action.

Voters passed a citizens' initiative establishing the Californian Coastline Commission. Its stated purpose is to "protect and enhance California's coast and ocean for present and future generations." The key word is future.

In the seeming blink of an eye, those future generations are here. They are my children and grandchildren, and millions more. Because of those who took the long view and knew the incalculable value of our natural world, today's children can play in the water, run on the warm sand, and search the tidepools like I did. Californians who saw beyond their present moment—and cared enough to fight—left the world a priceless legacy

Out-of-state visitors to Utah are aghast at how much irreplaceable open space we have covered with asphalt, how gray our blue skies have become, how small our "great" lake is, how much of our vanishing water we sell to the highest bidder, and how lax our zoning laws are.

They have asked me whether Utahns realize what a priceless treasure our rural lands are.

We like to measure what we call "progress" in profits, tax revenues and jobs (even low-paying dead-end jobs), but who is placing value on fields, animal habitat, tranquility, clear skies, and beauty?

It is almost unbelievable that the destruction of thousands of acres of life-saving wetlands is actually being subsidized by Utah's own taxpayers.

UIPA continues to be unwilling to study the true costs of deadlier air, unending noise, polluted stormwater run-off, and the visual blight of a concrete jungle on the physical and mental health of our children.

I ask UIPA to stop its race toward development until it has adequately assessed the affects of increased railroad and truck traffic, with its accompanying air, water, and noise pollution. We must know the true costs to this generation, and more importantly, to the generations of children to come.

Utahns turn to our expanses of land and water for the priceless gifts of refreshment, strength, healing, peace, and freedom. This legacy must be passed on.

### **Rebecca Burrage - Holladay - 4/9/2024**

Weber County

Dear UIPA Board Members,

I am one of the founding members of Great Salt Lake Interfaith Action Coalition.

Speaking to concerns many in our group have about the Weber County Inland Port project, two of the participants in GSLIAC who are Ogden ministers recently wrote an opinion piece for the Ogden Standard Examiner (see link below).

They explained that "This region is sacred to so many faith traditions. Spending public money on enormously expensive and wasteful development, the filling in and paving over unstable wetlands, is a greedy insult to the rich Creation that God has given us "

As a health care professional, I am also very concerned about the danger this project poses to the health of people living not only in Weber County, but throughout the Wasatch front and beyond. Our air quality will undoubtedly worsen.

Please reconsider the plan to move ahead with the Weber County Inland Port project.

Sincerely,

Rebecca Burrage

<https://www.standard.net/opinion/letters/2024/mar/30/letter-ogden-pastors-oppose-inland-port-in-weber-county/>

**Ivan Weber - Salt Lake City - 5/16/2024**

To: Ben Hart, Executive Director, Utah Inland Port Authority

CC: Abby Asborne, UIPA Chair; Ryan Starks, UIPA Vice-Chair; Jonathan Freedman, CEO World Trade Center Utah; Rep. Jefferson Moss, Majority Leader Utah House District 51; Sen. Jerry Stevenson, Utah Senate District 21; Joel Ferry, Executive Director, Dept. of Natural Resources; Victoria Petro, Salt Lake City Council District 1; Bill Wyatt, Exec. Dir., Salt Lake City Dept. of Airports; Ben Buys, Amy Brown Coffin and Larry Shepherd, UIPA Executive Team

From:

Ivan Weber, Weber Sustainability Consulting (Retired), Salt Lake City

Subject:

Wetlands Soils and Hydrological Impacts of Inland Port Construction and Operations  
Proposed Weber County Inland Port: Remove from Agenda, May 20th UIPA Meeting

Dear Mr. Hart:

The Lake's the Thing, to paraphrase the great bard, William Shakespeare. The proposed Weber County Inland Port promises to destroy, by physical disruption and poisoning, not only what we see, but also what we do not see, into the far-distant future. Wetlands are visible manifestations of the intensely complex interaction of surface and ground waters with vegetation and soils, forming essential communities of soil, water, microbiological organisms, and complex sets of chemicals that, together, perform extremely rare and precious services for human and wild ecosystems. The Great Salt Lake shorelands are especially unique examples of this set of functions and services.

Please exercise your awareness of these values by removing consideration of the Weber County Utah Inland Port from the agenda of the May 20, 2024 UIPA Meeting.

As a retired environmental engineering manager, architectural/engineering technology specifier, LEED Accredited Professional (the first in Utah, accredited in the 1990s, and founder of the Utah

Chapter USGBC), formerly licensed general contractor, and construction/environmental manager, I speak from more than a half century of engineering/architecture technology and environmental engineering management --- all of it in the Wasatch Front area --- including ten years of environmental contracts management for Kennecott's Environmental Engineering Projects Group. During work for Kennecott, I explored the application of wetlands plants for phytoremediation of contaminated waters and soils in the area now occupied by the original portions of the Daybreak development in South Jordan, Utah. I am now reviewing Kennecott/Rio Tinto's "North Zone" facilities, including the Kennecott Wastewater Treatment, Refinery and Tailings areas, and, more particularly, their wetlands on the south shore of the Great Salt Lake.

To cut to the chase, the Utah Inland Port in Weber County will eclipse 12.5 to 14.0 square miles of wetlands and lands with wetlands hydrological regimes. Although further study is needed for analysis of wetlands hydrological and soils systems, The initial structural engineering requirements of these soils are characterized by compaction, water diversion and collection for drainage, and then substitution of gravels compacted to thousands of pounds per square inch of bearing capacity, concrete footings to support building point-loads, with very heavy pavements and building slabs essentially everywhere. Anaerobic wetlands soils, characterized by high organic content clays but little air, are typically of high alkalinity. Warehouse-type construction will almost uniformly convert the entire area to more acidic soils/hydrology systems that are essentially the opposite of wetlands soils and hydrology.

Invasive plant species threaten to alter inextricably the plant communities of the Great Salt Lake, thereby rendering wildlife communities unable to utilize them for all functions of their lives. *Phragmites australis* (giant reed), particularly, is a plant species that invades and utterly dominates plant communities. On the UIPA website, a photo image representing wetlands, while possibly well-intended, communicates complete lack of awareness that *Phragmites* is the only plant visible. A recent series of presentations at the Friends of Great Salt Lake Issues Forum, held last week, dramatized the near-impossibility of removal, eradication or extermination by herbicides of *Phragmites*. It grows to enormous size and density, relative to other emergent wetlands species, such as *Typha latifolia* (cattail), *Juncus effusus* (soft rush), *Scirpus maritimus* (alkali bulrush), or other emergent wetlands plant species, which often grow in open water clusters. *Phragmites* is an extremely serious barrier to plant community remediation, and therefore to ecological maintenance and restoration. The catalog of problems presented by invasive plants is too numerous to list here, even if we had the botanical expertise to do so. We wish we did, but we don't.

The area will be forever changed by the UIPA plan and design and, for wetlands functions and values, devastated. Obliterated. Utterly removed from the Great Salt Lake ecosystem, never to function as a part of this venerable place that has been integral to this hemispherically critical migratory bird habitat. The Great Salt Lake's complex and precarious set of microbiological, invertebrate, and vertebrate ecological interactions that have existed for thousands and thousands of years persists only precariously, thanks to our corporate dominance of the field of societal choices made over the past century. Replaced by compacted gravels, concrete, steel buildings, and trucks, wetlands soils, waters and plant communities. Millions of trucks, each truck further compacting the soils below,

pounding, pounding, pulsing, passing over paved surfaces with many tons each of loads, compressing and eliminating as much water from the soils below as can be envisioned. Wetlands don't have a chance in environments like this.

From the standpoint of site selection for this type of facility, even on a relatively small site, these shoreland-wetlands locations could not have been more ecologically unfortunate or damaging for conversion to the proposed types of land use. They are consistent in their impacts, as you will discover on the South Shore of the Great Salt Lake, as well. This is especially true when we recognize the "snapshot" nature of current Great Salt Lake water level history, realizing that water levels have ranged historically from hundreds of feet deeper, to dried up desert sites characterized by dust storms. The Aral Sea is one of many possibly extinct saline lakes that have completely disappeared from the planet's surface.

Dried up saline lakes present the possibility of extremely elevated levels of PM2.5 (ultra-fine particle size) dust storms will be accompanied by the certainty --- the absolute promise, given the increasing scientific sophistication of legal practices everywhere --- of lawsuits against deep-pocketed owners of facilities, rail transport and trucking lines for stirring up toxic dust storms. PM2.5 levels are upwards of 30 to 50 tons per square mile per month (!!) in nearly all industrialized cities in the US, with some reaching episodic quantifications of more than 150 t/sq.mi./month, levels that can be downright deadly.

The areas that have histories of toxics-polluting metals production, such as the South Shore of the Great Salt Lake, with mercury deposition from magnesium extraction, and lead-arsenic-selenium-and other toxics production from copper smelting/refining and accompanying WWTP and tailings deposition, makes the increasingly poisoned Great Salt Lake margin a mega-lawsuit, as well as a human and wildlife, disaster in the wings of this, one of the ecological bard's greatest works, a mistake we can only understand looking back. Please ask yourselves whether, and to what extent, you truly understand the industrial land use history of this area and mega-site, to assure yourselves and your prospective community that no disasters are waiting in these wings, beyond the billions of wings of migratory shorebirds and waterfowl that will be pushed nearer to the brink of extinction by this misbegotten project.

Please understand that the 14 square miles you have been studying and presenting, solely for its engineering and economic parameters, must be comprehended looking simultaneously backward, downward and forward in time, space, and ecological functions in order to understand the true dimensions of this horrible project.

Sincerely,  
Ivan Weber  
Principal/Owner  
Weber Sustainability Consulting  
953 East First Avenue  
Salt Lake City, Utah 84103