



July 11, 2025

Cynthia T. Brown
Chief Section of Administration
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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Re: Finance Docket No. FD 32760 (Sub-No. 51) – Emergency Petition for Enforcement

Dear Chairman Fuchs and Members of the Board:

The Utah Inland Port Authority (UIPA) is a state entity committed to enhancing Utah's freight infrastructure and reducing roadway congestion by shifting more cargo to rail. With the highest percentage of truck freight traffic in the nation, Utah is at a critical juncture—strategic rail expansion is not only environmentally responsible, it's essential to sustaining our economic momentum. We believe intermodal competition is a key driver of efficiency, affordability, and innovation in freight movement.

Union Pacific has been a foundational partner in Utah's transportation and economic development for more than a century. Their continued investment in our state, collaborative spirit, and operational excellence have made them integral to Utah's success. From rural communities to urban centers, Union Pacific has helped fuel commerce, connect markets, and deliver consistent service. We value that relationship deeply. UIPA also recognizes that there may be valid operational concerns raised by Union Pacific.

At the same time, Utah is growing at an unprecedented rate. To meet the demands of the future, we must plan for increased capacity and resiliency in our transportation systems. That's why **dual intermodal rail service** in Salt Lake City is not just a benefit—it's a necessity. Adding a second intermodal provider enhances supply chain flexibility, attracts additional ocean carriers, and strengthens our competitive standing against peer regions served by multiple Class I railroads.

The newly completed intermodal terminal in Salt Lake City was designed with this very goal in mind: to unlock additional capacity and deliver tangible benefits for shippers and consumers across the region. Limiting access to this infrastructure risks higher costs, reduced service quality, and diminished economic opportunity.

We are not advocating against any provider—we are advocating for more. The presence of **dual intermodal service** ensures redundancy, drives innovation, and enables our freight system to scale with demand. If non-essential operational barriers are hindering that progress, we respectfully urge the Board to grant the Emergency Petition for Enforcement and affirm the importance of open, competitive access.

Utah's future depends on a transportation system as dynamic and forward-looking as the economy it supports. We're proud of our legacy with Union Pacific—and we're equally committed to building a future where **dual intermodal service** is a pillar of Utah's continued success.

Sincerely,

Ben Hart

Executive Director
Utah Inland Port Authority
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Cc: Union Pacific, Michael L. Rosenthal, Mrosenthal@cov.com

CERTIFICATE OF SERVICE

I hereby certify that I have caused this document to be served electronically or by first class or express mail, postage pre-paid, on all parties of record in this proceeding.



Ben Hart

July 11, 2025