

Our True North: *Safely Home*

Douglas A. Ducey, Governor
John S. Halikowski, Director

January 10th, 2021

Adam Assenza
Surface Transportation Board
Environmental Analysis Project Manager
Office of Environmental Analysis

Subject: Docket No. FD 36501, Union Pacific Railroad Company – Construction and Operation Exemption – in Maricopa County, AZ; Preliminary Environmental Consultation

Dear Adam Assenza:

Thank you for your notification of the forthcoming proposal from the Union Pacific Railroad Company (UP) to construct and operate approximately six miles of new rail line in Maricopa County, Arizona. ADOT would like further coordination as information on the location of the new rail line is available.

Specifically, if entering ADOT Right of Way, there would need to be a review for compliance with ADOT's National Pollution Discharge Elimination System (NPDES) and the Arizona Antiquities Act in order to issue an Encroachment permit.

For further information on potential environmental impacts, please refer to ADOT's Environmental Assessment for the SR 24, Ellsworth Road to Ironwood Road, Phase II Interim project. The "Final Environmental Assessment for State Route SR 802, Williams Gateway freeway" (2011 Final EA) and the "Reevaluation of the final Environmental Assessment" (January 2018), is available on ADOT's website:

(<https://azdot.gov/projects/central-district-projects/sr-24-interim-phase-ii-ellsworth-rd-ironwood-rd/documents-sr-24>).

We appreciate receiving the notice, and the opportunity to review and comment. I am happy to assist with any other questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexis Zaring', is written over a horizontal line.

Alexis Zaring
Central District Environmental Coordinator
Arizona Department of Transportation, Central District

Enclosures (1): Environmental Assessment Project Area and Summary

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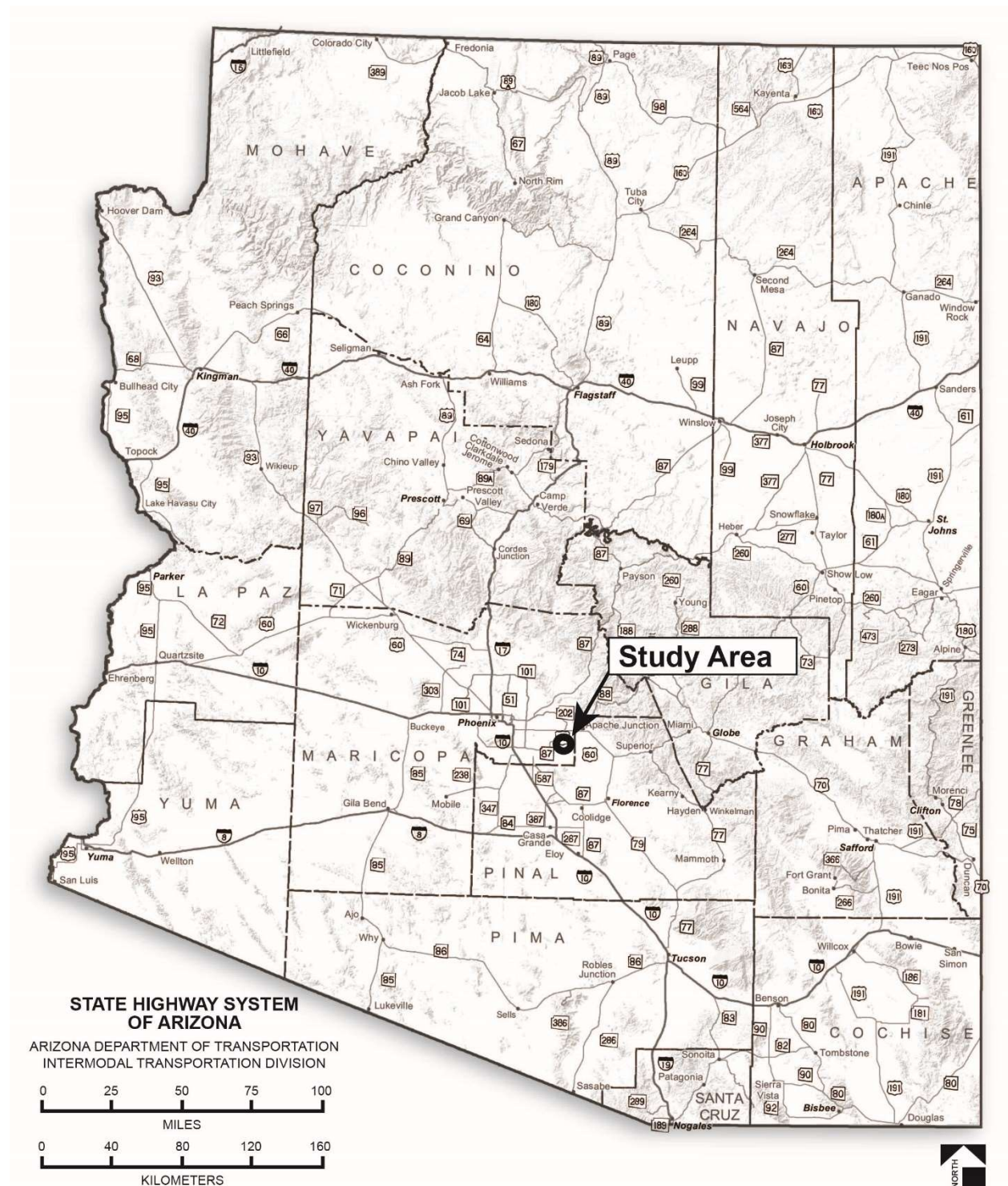


Figure 1. State location map

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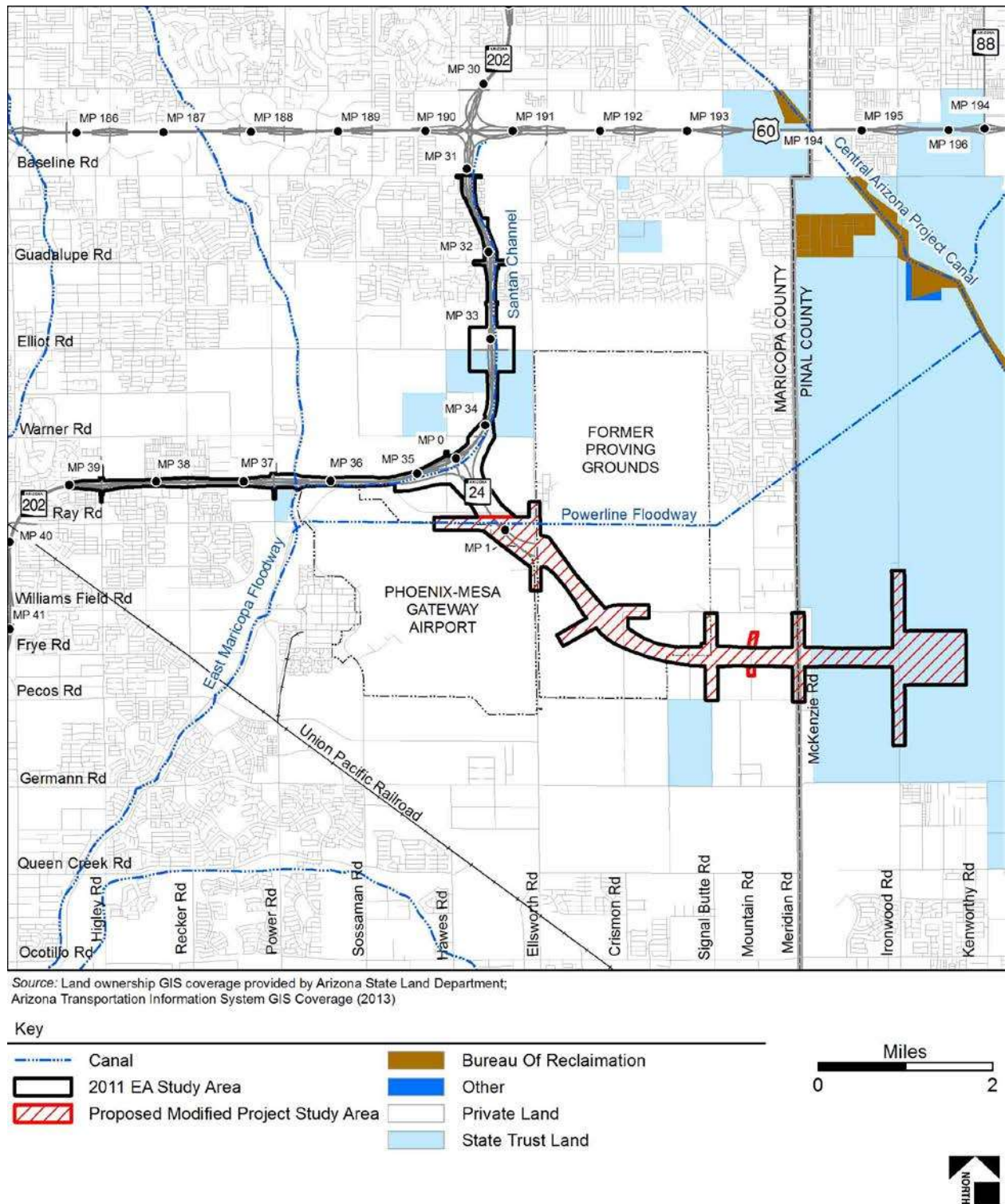
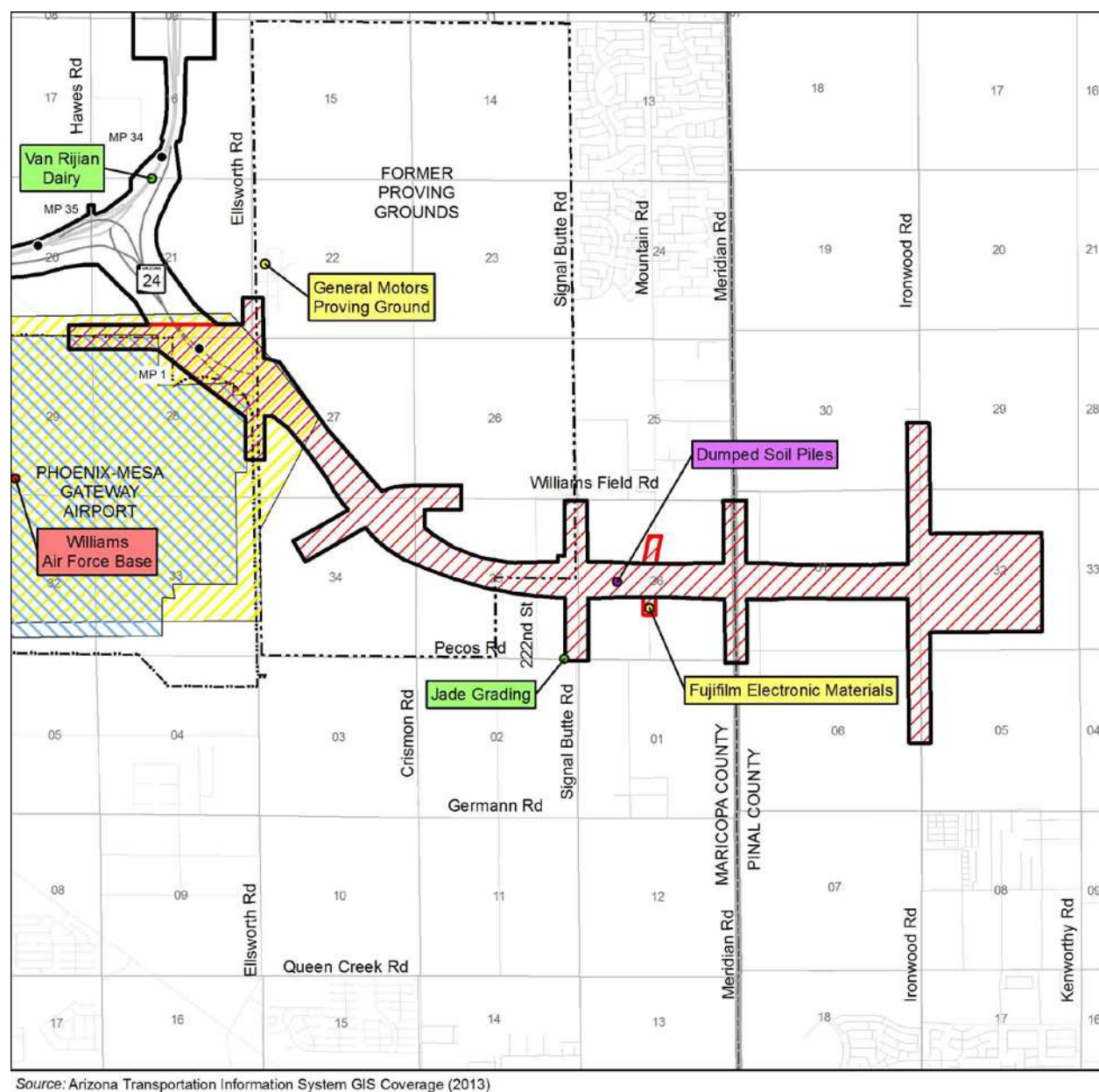


Figure 2. Project vicinity map

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Key

- | | |
|--|--|
| 2011 EA Study Area | Low Risk Level |
| Proposed Modified Project Study Area | Moderate Risk Level |
| Recognized Environmental Concern (REC) | Federal Department of Defense (DOD) Site |
| | Superfund Site |

Miles
 0 1



Figure 8. Hazardous Materials map

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TABLE 4. SUMMARY OF ENVIRONMENTAL IMPACTS

Resource	2011 Final EA Finding for the Selected Alternative	Finding for the Proposed Modified Project
Land Ownership, Jurisdiction, and Land Use (including Prime and Unique Farmland)	Would conform to local and regional planning documents; therefore, would cause minimal change to existing and future land uses.	Same
Socioeconomic Conditions (Social Environment, Environmental Justice, and Economic Conditions)	Would require the relocation of approximately four households along the SR 24 alignment; there are no protected populations within the study area; therefore, would not impact these populations; no neighborhoods would be bisected by the Preferred Alternative, and access to local services and facilities would be enhanced due to reduced traffic congestion of surface streets	Would require the relocation of approximately four households along the SR 24 alignment. Protected populations are present within the study area; however, no neighborhoods would be bisected by the Preferred Alternative, and access to local services and facilities would be enhanced due to reduced traffic congestion of surface streets
Cultural Resources	Would impact historic properties and require the preparation of documents for treating and mitigating cultural resources (PA and treatment plan)	Same
Section 4(f)	Would result in direct impact to one planned recreational trail; impacts could be mitigated by design measures	Would result in direct impact to two planned recreational trails (City of Mesa planned shared-use pathway and Pinal County planned trail); impacts would be mitigated by design measures
Air Quality	Would reduce regional impacts of air quality; potential short-term exceedances of CO and PM10 during construction	Same
Noise	Would not result in impacts to receivers that warrant mitigation per ADOT NAP; some receivers would be temporarily affected by construction noise	Same
Utilities	Would require several utility relocations	Same
Visual Resources	Would be a noticeable feature in the landscape; however, impacts are anticipated to be low due to low scenic value throughout the study area and presence of few sensitive viewers	Same

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Resource	2011 Final EA Finding for the Selected Alternative	Finding for the Proposed Modified Project
Drainage and Floodplains	Would traverse two floodplains in the project construction limits—the EMF and a designated 100-year floodplain near the proposed SR 24/Meridian Road TI; potential impacts to the 100-year floodplains would be addressed during the final design; coordination with the floodplain managers would occur during the final design	Same
Clean Water Act Sections 404/401 and Section 402	Would cause temporary and permanent impacts to waters of the US, and the project would require a Section 404 permit; would generate greater than 1 acre of ground disturbance and an AZPDES permit with a SWPPP and Storm Water Monitoring Plan would be required	Would not cause additional impacts on jurisdictional Waters; would require an AZPDES permit with a SWPPP
Biological Resources	Would impact general vegetation and wildlife; would not impact currently listed Threatened or Endangered Species; would impact one candidate species and species protected under the Migratory Bird Treaty Act	Same
Hazardous Materials	Would impact four sites of potential moderate- or high-risk concern	Same, with the addition of impacts to the REC found during the Phase I ESA investigations.
Secondary Impacts	Would tend to create permanent, substantially negative impacts that would fragment habitat, increase the potential for road related mortalities of wildlife, facilitate further destruction of approximately 545 acres of natural desert, threaten cultural resources, and cause additional loss of the natural drainage system	Same
Cumulative Impacts	Would tend to create permanent, substantially negative impacts that would fragment habitat, increase the potential for road related mortalities of wildlife, facilitate further destruction of natural desert, threaten cultural resources, and cause additional loss of the natural drainage system	Same

From: [Alexis Zaring](#)
To: [Assenza, Adam](#)
Cc: maggie.buckley@jacobs.com
Subject: Docket No. FD 36501, Union Pacific Railroad Company – Construction and Operation Exemption
Date: Monday, January 10, 2022 4:01:09 PM
Attachments: [UPRR ADOT Review Signed.pdf](#)

Good Afternoon,

I would like to submit the following letter on behalf of the Arizona Department of Transportation regarding the UPRR PIRATE Initial Agency Consultation request. I will act as the point of contact and future correspondence can be sent electronically to this email.

Please let me know if I can be of further assistance.

Alexis Zaring | District Environmental Coordinator
| Arizona Department of Transportation | Central District
| phone: 602.920.7392