



June 30, 2023

Mr. Adam Assenza
Surface Transportation Board
Environment Filing, Docket No. FD 36501
% Sabra McNeish, Jacobs Engineering Group Inc.
1501 West Fountainhead Parkway, Suite 401
Tempe, Arizona 85282

Electronically submitted to Adam.Assenza@stb.gov

RE: Draft Environmental Assessment: Pecos Industrial Rail Access and Train Extension (PIRATE) Project Docket No. FD36501

Dear Mr. Assenza:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Draft Environmental Assessment (DEA) for the Proposed Pecos Industrial Rail Access and Trail Extension Project (PIRATE). The Department understands the rail line is needed to meet the transportation and logistical needs of the existing and future manufacturing businesses in the City of Mesa, Arizona and further understand the analysis is necessary in order for the Surface Transportation Board (STB) to consider Union Pacific Railroad Company's request for authority to operate and construct the proposed rail line. The STB recommends if the authorization is granted, Alternative 1 would minimize the impacts from construction and operation of PIRATE on the environment. The proposed PIRATE includes construction and operation of 6 miles (a total of 254 acres in the project limits) of new track through agricultural croplands and a wye connection (y like connection) to the existing Phoenix substation and industrial companies at the end of the Pecos Advanced Manufacturing Zone. Throughout the PIRATE limits, heavy machinery and removal of vegetation would be required.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department appreciates the inclusion of the voluntary and recommended mitigation measures for Biological Resources identified in Chapter 4 of the DEA and recommends carrying

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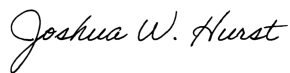
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forward those measures to the final EA. Additionally, the Department recommends the following voluntary measure be added to the final EA:

- Artificial lighting could impair the ability of nocturnal animals to navigate (e.g., owls, migratory birds, bats, and other nocturnal mammals) and may affect wildlife behavior and populations ([Davies et. al. 2013](#)¹). The Department recommends using only the minimum amount of light needed for safety. If feasible, narrow spectrum lighting is wildlife-friendly and should be used as often as possible to minimize the number of species affected by lighting. It is also beneficial that all lighting is shielded, canted, or cut to minimize the amount of upward shining light.

Thank you for the opportunity to provide input on the PIRATE. For further coordination, please contact Kelly Wolff at kwolff@azgfd.gov or 480-324-3550.

Sincerely,



Joshua Hurst
Regional Supervisor

Attachment

cc: Ginger Ritter, Project Evaluation Program Supervisor

AZGFD #M23-06262006

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119>