



December 15, 2023

Surface Transportation Board  
Office of Environmental Analysis  
395 E. Street SW  
Washington, D.C. 20423

Re: Union Pacific Railroad Company – Construction and Operation Exemption  
Maricopa County, Arizona  
FD 36501

Dear Surface Transportation Board:

Commercial Metals Company (CMC) has been in business over 100 years, and as the largest manufacturer of steel reinforcing bar in North America, we are a key supplier for construction of buildings, bridges, roads, and infrastructure in the United States. As we indicated in our letter dated June 23, 2023, access to rail service through the Pecos Industrial Rail Access and Train Extension (PIRATE) is critical to our manufacturing facilities and to the East Valley's efforts in attracting advanced manufacturing to the region.

CMC is an innovative industry leader, becoming the first in the world to open a continuous process micro-mill, employing new, more energy-efficient technology. Dedicated to growth and innovation, CMC elected to invest in excess of \$300 million to locate its second micro-mill facility in Mesa, Arizona and bring approximately 220 additional jobs to the area due in part to the potential for rail access through the PIRATE.

CMC and Union Pacific are both moving forward towards the shared goal of establishing rail service to CMC in Mesa, AZ. Access to the national rail network is critical, and Union Pacific's investment in the construction of this new rail line benefits not only CMC by supporting its business, but the economic development of the region as a whole.

We understand the process for approving authority to construct and operate a new rail line is complicated, made even more so by the balancing act necessary to address concerns in culturally sensitive areas. However, we urge the Office of Environmental Analysis to continue to move the process of review forward expeditiously. With the current lack of rail at our production facilities, we rely on semitrucks to deliver recycled materials at a significantly increased cost. Accordingly, completion of the project is key to CMC's continued economic growth and the economic growth in the area.

CMC has a long history as one of the most sustainable manufacturers in the world. We have built our business on utilizing and repurposing scrap material that many others would have considered waste. In fact, our two steel mills in Arizona are the largest consumers of recyclable metals in the state. Construction of the Pecos Industrial Rail Access and Train Extension (PIRATE) would allow us to take delivery of recycled metals by rail at both mills, which in turn would significantly reduce our reliance on more emission intensive over-the-road methods of transportation and improve traffic conditions in the expanding East Valley. Ultimately, the reduction in traffic and emissions made possible with rail access further enhances the sustainable profile of our steel making operations and benefits the local community.

We ask the Surface Transportation Board for an expedited review and approval of this extremely important project to not further delay construction and benefit to the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter R. Matt", written over the word "Sincerely,".

**Peter R. Matt**  
President and CEO