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11/21/2025

Transmitted via email only

Ms. Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: STB Docket No. FD 36501, Union Pacific Railroad (UPRR) –Responses to information requests

Dear Ms. Gosselin,

As it relates to the PIRATE Industrial Lead project, with regards to the information request made by the STB on 9/19/2025 to update the draft Environmental Assessment (EA), UPRR offers the following responses (answer in **red**):

1. Question: A description of any substantial changes that have been made to the proposal's design, construction, and operational details listed in Attachment A and/or the construction information listed in Attachment B.

Answer: there are two notable changes. The first is revisions to the proposed Ellsworth Road at-grade crossing design due to the City of Mesa road-widening project (from 4 lane to 6 lane section). Please see Attachment C, page 3 for details. The second is that UPRR will no longer grade 650' of the segment of track connecting to Fujifilm. Other edits to Attachment A and B are shown in red on the respective documents (see attachments).

2. Confirmation that there have not been any new requests for quiet zones since publication of the Draft EA.

Answer: there have not been any new requests for quiet zones.

3. Confirmation that no changes have been made to the proposed detour routes to be used during construction of the proposed rail line.

Answer: there have not been any changes to the proposed detour routes.

4. A summary of any utility coordination completed to date and identification of any unresolved utility conflicts.

Answer: please refer to Attachment D for a summary of utility coordination.

5. An update on the status of permit applications or approvals, including the Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers and the floodplain development permit from the Flood Control District of Maricopa County.

Answer:

- a. USACE Section 404: NWP14 - Corps is waiting for conclusion of S106 under the STB undertaking and will reference that in the permit document. This is the only outstanding item to issue the permit.
 - b. AZ DEQ Section 401: programmatically certified under NWP14
 - c. FCDMC floodplain permit: renewed in August 2025
 - d. FAA 7460: 38 locations total studied; 36 locations cleared; 2 locations outstanding
6. Any updates to the economic analysis from the Pecos Industrial Rail Access and Train Extension (PIRATE) 2021 RAISE grant application that the City of Mesa provided on December 16, 2021.

Answer: there are no updates to the economic analysis

7. An update on any coordination efforts with the Phoenix-Mesa Gateway Airport since August 2023.

Answer: Design consultant (Olsson) outreach to Rich Adams (PMGAA Project Manager) was made via phone call on 8/5/2025. Summary of discussion topics:

- a. UPRR intent to advance the project. Rich acknowledged and appreciated the communication and advanced notification.
- b. Per direction from City of Mesa, UPRR intends to maintain two-way traffic along Sossaman Road during roadway/utility construction followed by a second temporary full-closure for a short duration during track/crossing installation.
- c. Confirmation of PMGAA contact information for inclusion with contract documents to facilitate further contractor coordination at time of PIRATE project construction. Rich will serve as the PMGAA's primary point of contact. Project *Special Conditions* currently includes the following language regarding Contractor coordination with the PMGAA:

The Contractor shall notify Phoenix-Mesa Gateway Airport Authority (PMGAA) at least 30 calendar days prior to Sossaman Road construction activities to coordinate schedules and estimated timelines. The Contractor shall also provide notification to PMGAA upon completion of work. PMGAA contact information:

*Rich Adams*Project Manager

Phoenix-Mesa Gateway Airport Authority

5835 S Sossaman Rd

Mesa, AZ 85212-6014

Office: (480) 988-7655

Cell: (480) 283-4933

radams@gatewayairport.com

8. Any updates to right-of-way or temporary construction easements summarized in

Attachment A.

Answer: Summary of ROW and TCE acreages in Attachment A, changes in red.
Footnotes to the changes as follows:

- a. Total new ROW (previously 141.7 ac, updated to 144.4 ac) is attributed to additional property purchased south of Pecos Rd and east of PIRATE lead track (see Attachment E) as well as the Trammell Crow property being larger than was originally contemplated (see Attachment F)
- b. New ROW and permanent easements from public agencies (FCDMC previously 3.5 ac, updated to 3.3 ac) attributed to a reduction in the easement along Rittenhouse Channel per direction from FCDMC
- c. Total TCE's (previously 28.7 ac, updated to 23.4 ac) primarily attributed to the detention cell previously included with P034 is no longer required

See attachment C for locations of new TCE's (all are within the limits of the APE)

9. Confirmation that construction sequencing would begin with the proposed rail line, starting at the wye and continuing east, followed by construction of the planned Phoenix Subdivision support tracks.

Answer: This is correct with one caveat: UPRR wishes to advance construction in non-culturally sensitive areas on the proposed rail line upon approval of the project by the STB and with a cultural monitor per requirements of the Memorandum of Agreement (MOA).

Additional information requested from the 11/17/25 conference call

- Revised typical sections that reflect the change in subballast from 12 inches to 8 inches deep for the proposed PIRATE lead track paralleled by a drainage ditch and for the proposed PIRATE lead track paralleled by an access road and drainage ditch (see Sheets T006 and T008).

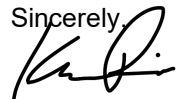
Answer: revised typical cross sections provided in Attachment G

- The anticipated year where rail traffic on the Phoenix Sub is anticipated to increase by one train a day to a total of 5, and whether that additional train would be in one direction or both directions

Answer: 2027 – this would be in both directions

If there is any additional information or clarification needed with regard to the updated information, please don't hesitate to call me. Or we can set up a conference call to review the changes

Sincerely,



Kevin Rice

Senior Manager M/W Environmental

Union Pacific Railroad

cc: Tanya Spratt, UPRR

Adam Assenza, OEA

Maggie Buckley, Jacobs

Alan Tabachnick, OEA

Enclosures: Attachment A,B,C,D,E,F,G

ATTACHMENT A – Proposed PIRATE Construction and Design Features

Project Feature	Proposed Action
Proposed rail line length	5.7 miles
PIRATE yard	3,500 feet long; 2-yard tracks in addition to the proposed rail line
Future yard tracks	Three planned additional yard tracks at the PIRATE yard up to 2,500 feet long (for a total of five yard tracks)
Run-around track	5,100-foot-long run-around track west of Signal Butte Road
Grading for segments of connecting track located within PIRATE right-of-way	650 feet of the segment of track connecting to Fujifilm ; Proposed CMC turnout and 300 feet of the segment of track connecting to CMC
Total new right-of-way	141.7 144.4 acres (with right-of-way widths generally ranging from 110 to 150 feet)
New right-of-way from private owners	126.0 128.9 acres
New right-of-way or permanent easements from public agencies: ASLD, FCDMC, and Mesa	7.3 acres (ASLD), 3.5 3.3 acres (FCDMC), and 4.9 acres (Mesa)
Total TCEs	28.7 23.4 acres
TCEs from private owners	9.0 2.5 acres
TCEs from public agencies: ASLD, Mesa, and Queen Creek	1.5 0.6 acres (ASLD), 16.9 19.0 acres (Mesa), and 1.3 acres (Queen Creek)
Rail line access	New, unpaved access road parallel to rail alignment west of Ellsworth Road, existing paved public roads, existing unpaved private roads; UP would not maintain the private access roads as public roads. New access drives from public right-of-way to provide UPRR unpaved access to UPRR signal equipment adjacent to at-grade crossings. UPRR unpaved access road along proposed Run-Around Track between Crismon Road and Signal Butte Road.
Railbed and track construction	Total fill: approximately 100,000 150,000 cubic yards; total excavation: approximately 280,000 331,000 cubic yards; ^[2] railbed composition: 12 8-inch-deep layer of subballast, 12-inch-deep layer of ballast, railroad ties, and steel rails; typical single-track section: 30 feet wide
Maximum height of project elements	Railbed, ballast, and track: 15 feet above the existing ground surface; wayside signs: 32 feet; crossing gates and lights: 32 feet
At-grade crossings	Pecos, Sossaman (two locations), Ellsworth, Crismon, and Signal Butte Roads
Drainage	Culverts to convey existing channels and washes beneath railbed; drainage ditches adjacent to the railbed; detention basins to manage stormwater runoff
Acquisition of materials for rail line construction	No new materials sources or borrow areas; construction materials delivered via truck and rail
Construction staging areas	Staging, stockpiling, and laydown areas within proposed right-of-way and TCEs
Construction schedule	9-month time frame; weekday and daylight work only; 10-hour workdays
Operational information	• 4 trains/day at 60 mph on main line and 10 mph on Germann Siding; projected growth +1 train/day over 5 years on main line. 1 train/day (30 to 35 cars) at opening on PIRATE; 1 train/day (70 to 100 cars) at full buildout. 2,218 feet (2 locomotives + 35 boxcars) at opening; 4,435 feet (4 locomotives + 70 boxcars) at full buildout. • Service 5 days/week. • PIRATE would travel 5 to 30 mph, working track 20 mph, and Germann Siding 10 to 30 mph at opening. • Switching/train building only at support yard. • Standing trains at support tracks and occasionally short term at Germann Siding. • Trains slow from 60 mph to 5 mph and braking begins 1-2 miles away; airhorn use at at-grade crossings only (~2 times/day near wye area).
Locomotives	2 units, 3,800 hp each; GP60 or GP40; Ultralow Sulfur Diesel #2; average age 30 years; 1.2 hp per ton minimum.
Reduced truck trips	PIRATE would reduce approximately 30,000 truck trips off public roadways in the first year of operation.

ASLD = Arizona State Land Department; FCDMC = Flood Control District of Maricopa County; hp = horsepower; mph = miles per hour; PIRATE = Pecos Industrial Rail Access and Train Extension; TCE = temporary construction easement

^[2] The approximate excavation quantity of ~~280,000~~331,000 cubic yards accounts for previous excavation of approximately 41,000 cubic yards at the wye and east of Sossaman Road.

ATTACHMENT B – PIRATE Construction Information^[3]

Mesa Arizona
Phoenix Subdivision
MP 934.79 to MP 937.83
Construct Industrial Track

Project Schedule

Total Project duration 9 months

Equipment

Equipment	Quantity	Fuel	HP	Hours/day	Duration (months)	Notes
D6 Dozer	4	Diesel	215	9	7	Earthwork and Subballast
330 Trackhoe	2	Diesel	273	9	7	Earthwork and Culverts
352 Trackhoe	3	Diesel	424	9	5	Earthwork
730 Articulated Truck	18	Diesel	370	9	7	Earthwork, this could be tractors and pans, scrapers, or road haul trucks depending on means and methods
140 Motor Grader	3	Diesel	179	9	7	Earthwork and Subballast
815 Compactor	3	Diesel	249	9	5	Earthwork
CS12 GC compactor	1	Diesel	121	9	5	Subballast and Paving
966 Wheel Loader	2	Diesel	321	9	9	Culverts, Box Culverts and Misc.
262D3 Skid Steer	2	Diesel	74	9	8	Misc.
35 Ton Crane	2	Diesel	164	9	3	Box Culverts
Pickup	8	Gas	300	9	9	Contractor Supervision
AP1000F Paver	1	Diesel	225	9	2	Road work
Tractor Trailer	18	Diesel	400	9	4	Aggregate base hauling
TLM (UPRR)	1	Diesel	845	9	1	Track
963 Track Loader (UPRR)	1	Diesel	202	9	1	Track, To pull the TLM
6700 Tamper (UPRR)	2	Diesel	280	9	2	Track
966 Wheel Loader	2	Diesel	321	9	2	Track
4600 Regulator (UPRR)	2	Diesel	250	9	2	Track
Locomotive (UPRR)	1	Diesel	2,200	9	2	Track, Moving ballast cars
Pickup (UPRR)	6	Gas	300	9	2	Track Supervision

Assume 10 hour workdays, equipment is running 9 out of the 10 hours

Haul Trucks

Earthwork Trips 331,000 CY

Per 30% plans excavation quantity is ~~390,000 CY~~

Average 2 miles each way, 4 miles roundtrip

~~390,000 CY~~ 331,000 CY

20 CY/Truck

~~19500 Trips~~ 16,550 Trips

Aggregate Base Trips

Based on preliminary research, several quarries are located within 25 miles of the project

Assume 50 miles roundtrip

Per 30% plans subballast quantity is ~~61,000 CY~~ 43,000 CY

Per 30% plans ditch facing quantity is ~~21,000 CY~~ 25,000 CY

Round up to 86,000 CY for culvert, box culvert bedding and road base

Assume 1.8 tons/CY

154,800 Tons

22 Tons/Truck

7,036 Trips

Personnel

Assume an average of 70 personnel over the total project duration

Assume 30 miles round trip

Assume working 21 days per month (5 days a week)

13,230 Total Trips

Acres Disturbed

Per 30% plans clear and grub quantity is ~~100 acres~~ 107 acres

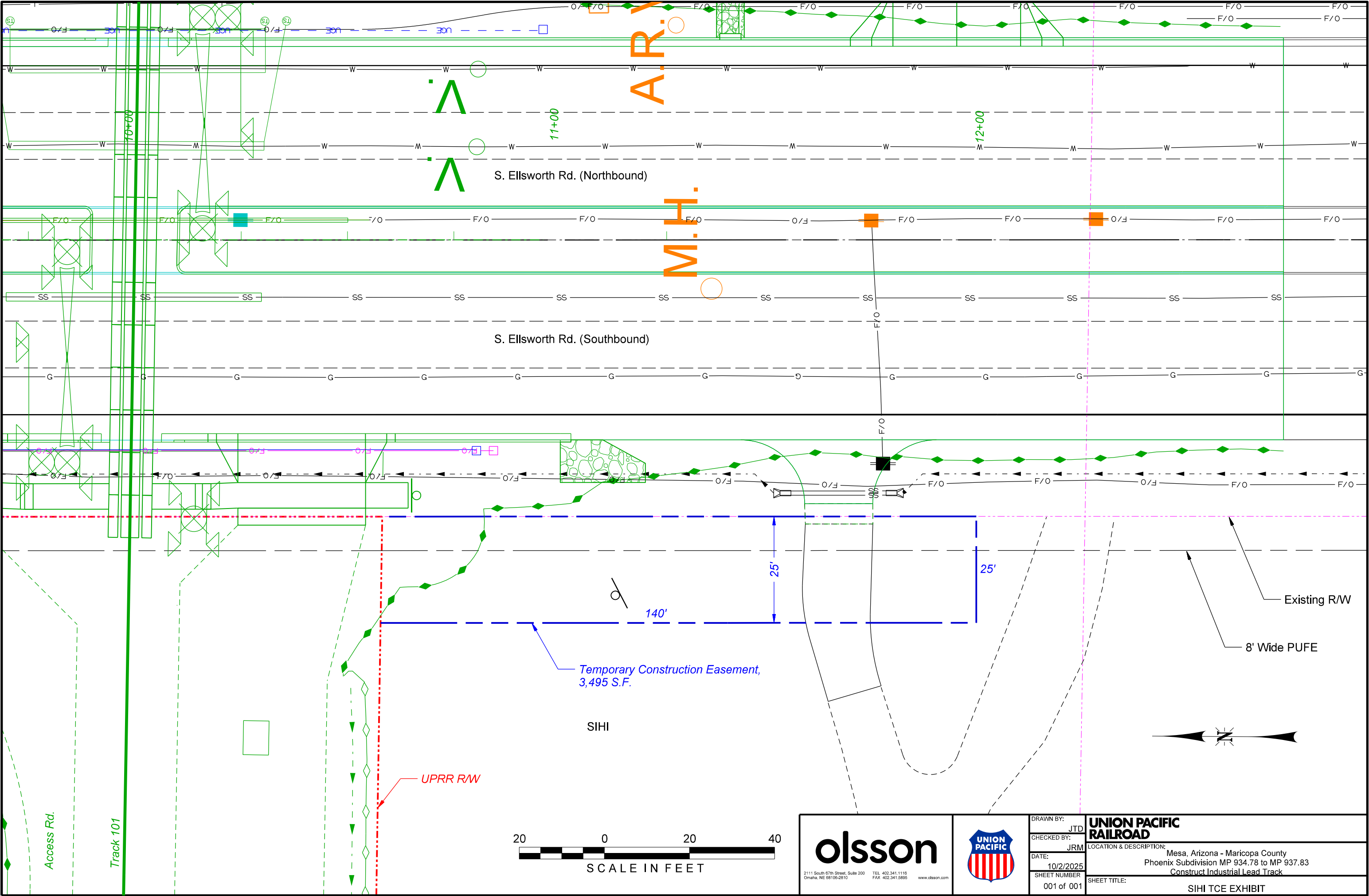
Assume 7 months of disturbance

107 ~~100~~ Total Acres

15.3 ~~14.3~~ Acres/Month

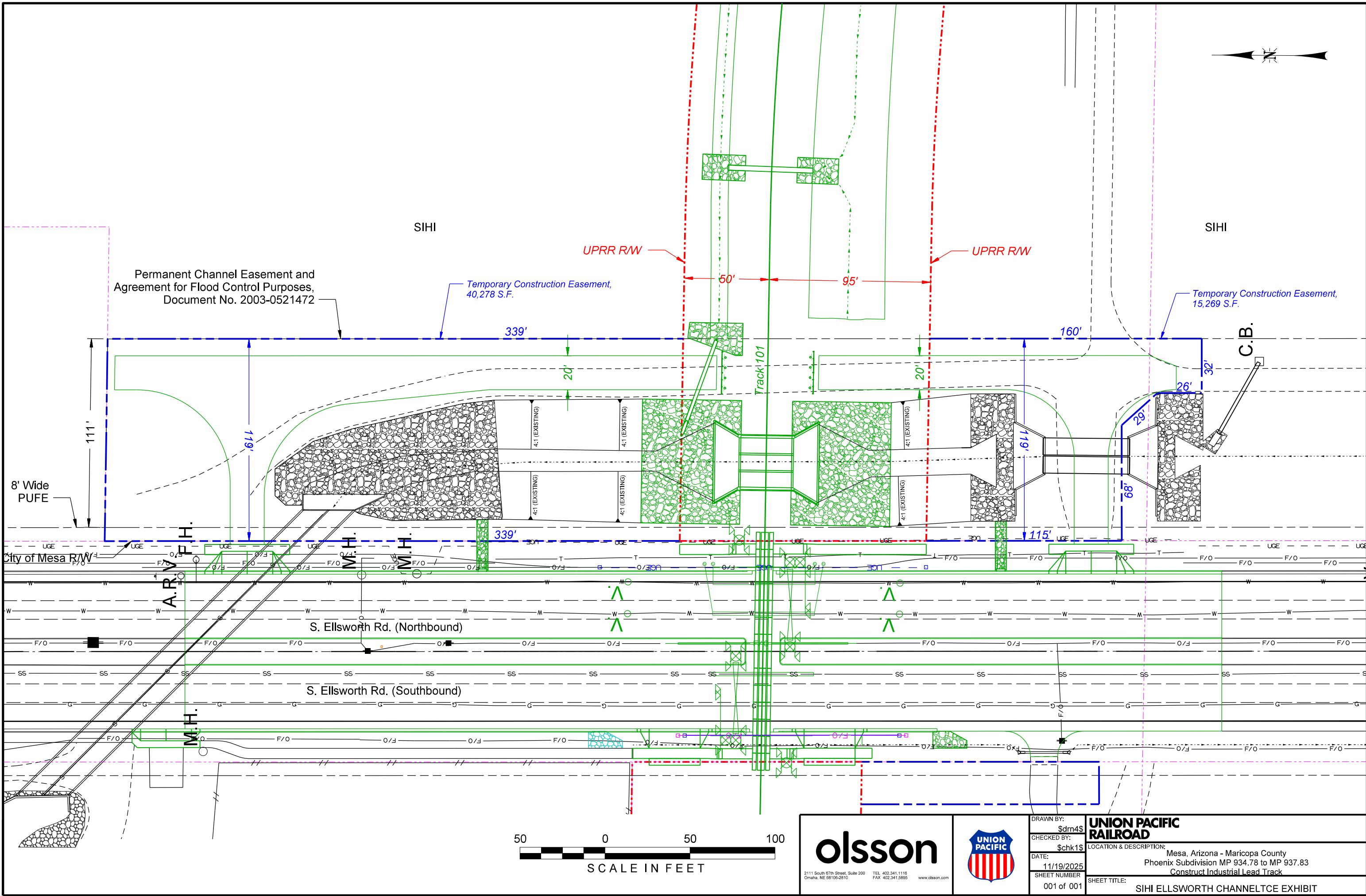
^[3] UP. 2022. UPRR Gateway Pirate Construction Summary 2022-02-15.

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Utility coordination for the UPRR PIRATE project has been organized into three categories:

1. Utilities cleared for construction
2. Utilities requiring relocation prior to construction
3. Utilities to be modified by UPRR's contractor during construction

Coordination was previously completed with several utility providers to resolve conflicts with the proposed rail infrastructure. Remaining utility conflicts must be addressed before grading operations commence. A Subsurface Utility Engineering (SUE) Quality Level B survey has been completed to verify existing and new utility installations within the Public ROW. The Utility Coordination team is actively reengaging utility companies to confirm outstanding conflicts and finalize relocation plans.

1. Utilities Cleared for Construction

- Kinder Morgan: Lowered a 24" underground natural gas pipeline to resolve a conflict with the proposed culvert north of the Rittenhouse Canal.
- Southwest Gas Corporation (SWG):
 - - Modified 2" casing vents for a 12" natural gas pipeline near S Sossaman Rd and E Germann Rd
 - - Lowered a 6" natural gas pipeline at S Sossaman Rd to resolve grading conflicts.
- Salt River Project (SRP):
 - - Removed a pole and overhead electrical distribution wireline along S Merrill Rd.
 - - Coordinated placement of a new high-voltage overhead transmission wireline and poles to avoid conflicts.
- Cox Communications: Coordinated design to ensure proposed underground fiber optic wireline meets railroad depth standards.

2. Utilities Requiring Relocation Prior to Construction

- Lumen:
 - - Two underground fiber optic cables and one underground copper cable along S Sossaman Rd.
 - - One underground fiber optic cable along Pecos Rd.
- Cox Communications: One underground fiber optic cable along Pecos Rd.
- SRP:
 - - Overhead electrical distribution wirelines along S Sossaman Rd and Crismon Rd.
 - - One underground electrical distribution wireline along S Sossaman Rd.
- Verizon: One underground fiber optic cable along S Sossaman Rd.
- Sunbelt Investment Holdings Inc. (SIHI): Requested coordination for a new crossing of a 10" irrigation waterline in a 24" casing. Initial design requirements have been provided to meet railroad standards.

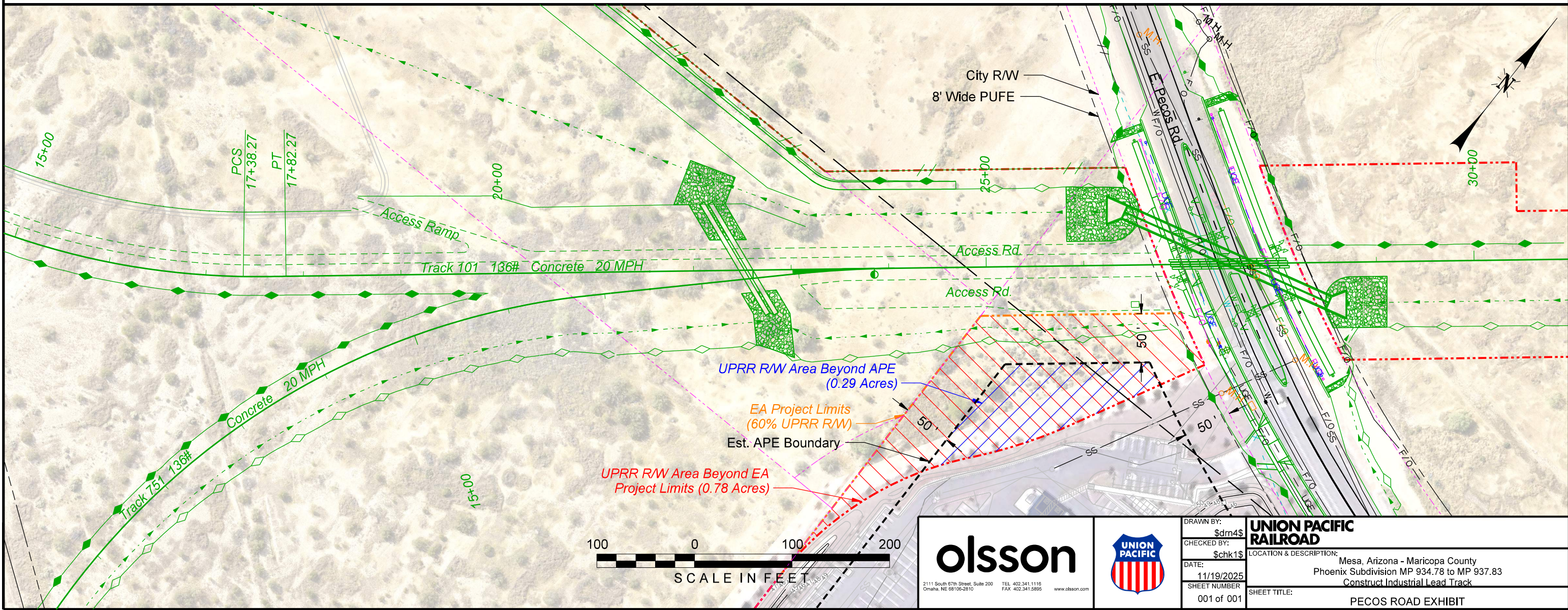
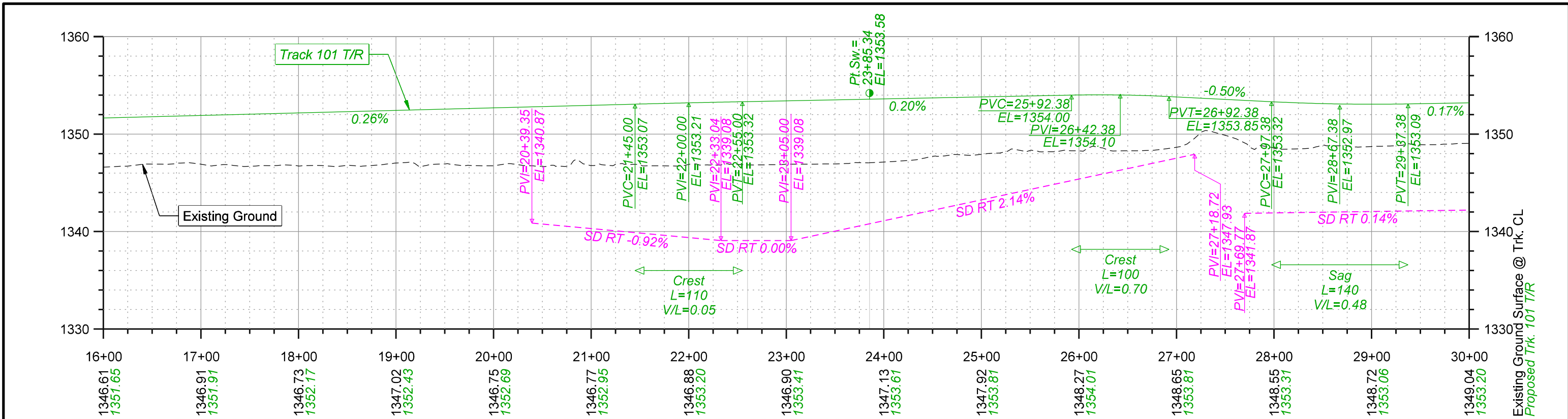
3. Utilities to Be Modified During Construction

- Kinder Morgan: Install a concrete slab between the pipeline and proposed track to protect the 24" natural gas pipeline north of the Rittenhouse Canal under both track wye segments.
- Zayo: Temporarily raise a fiber duct containing Zayo's and the City of Mesa's underground fiber optic cables during culvert construction at S Sossaman Rd.
- City of Mesa:
 - - Pecos Rd: Modify a 20" underground waterline, fiber optic cable, and 18" sanitary sewer pipeline.
 - - S Sossaman Rd: Modify a fiber optic cable and a 20" underground waterline.
 - - Ellsworth Rd: Modify an 18" sanitary sewer pipeline, fiber optic cable, 20" and 16" underground waterlines.
 - - Signal Butte Rd: Modify a 16" underground waterline, electrical wireline, and fiber optic cable.
- Verizon: Coordinate installation of a concrete cap over its underground fiber optic cable during paving at Signal Butte Rd.
- ZF Property: Relocate two 12" sanitary sewer pipelines and a low-voltage electrical wireline system.
- CMC Property: Install a protective concrete slab over a 12" underground waterline.

4. Current Utility Engagement

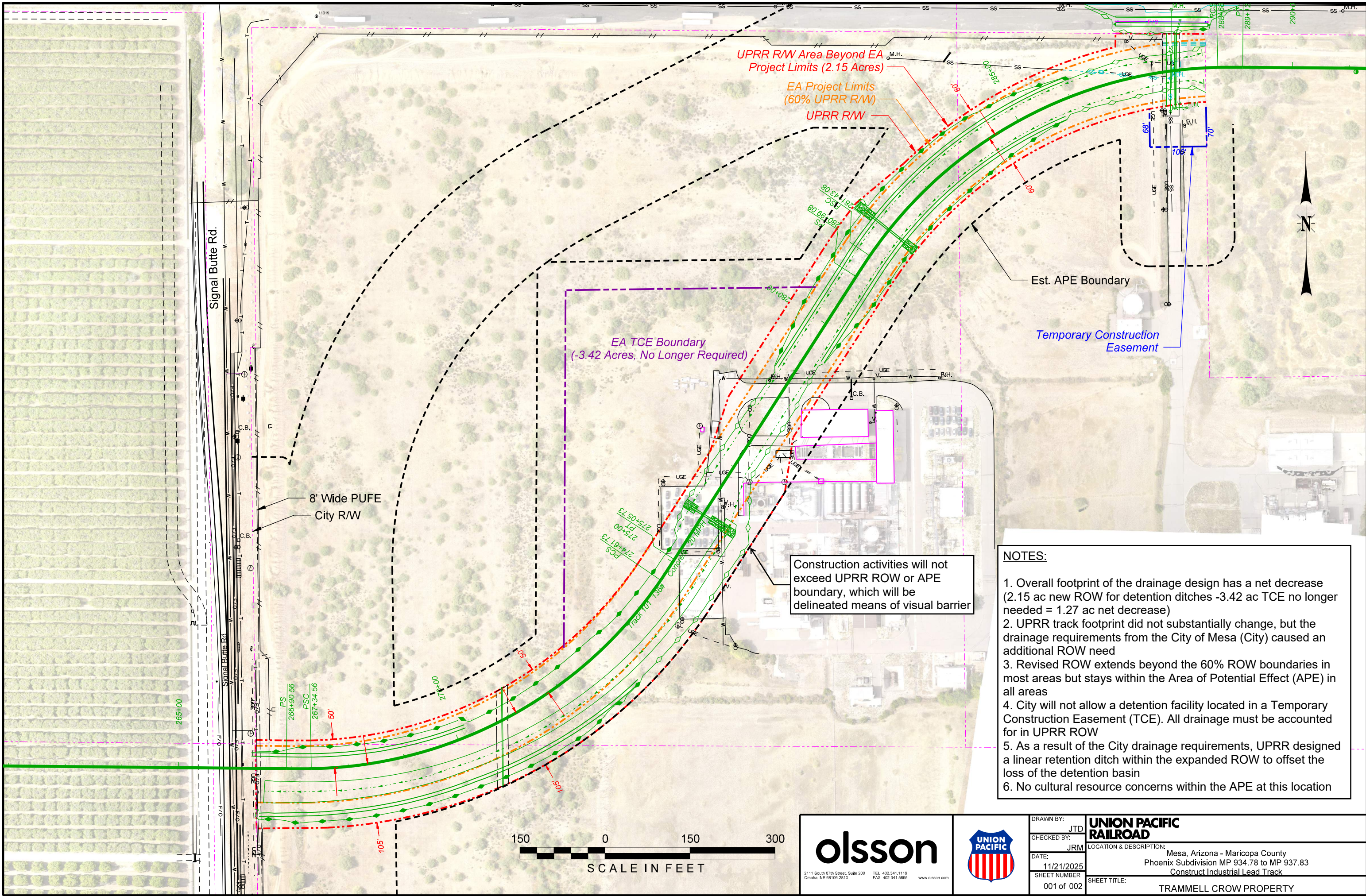
A non-intrusive SUE Quality Level B survey has been completed within public rights-of-way to verify existing and new utility installations. The results are currently under analysis to identify any changes or new conflicts. The Utility Coordination team has reinitiated contact with known utility providers to confirm outstanding issues and finalize relocation plans.

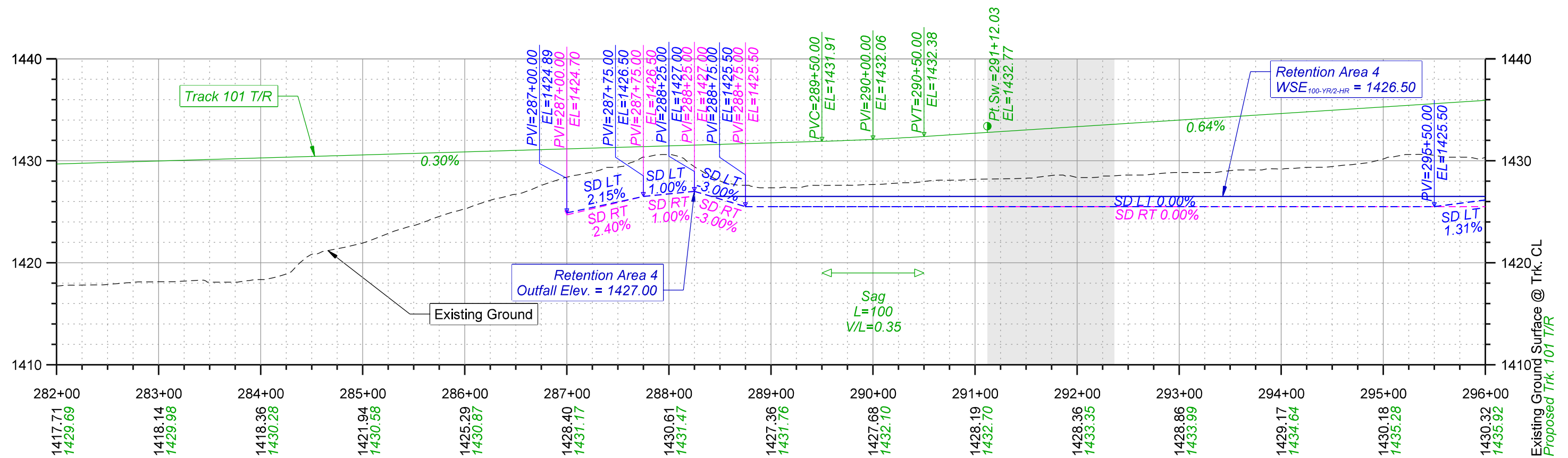
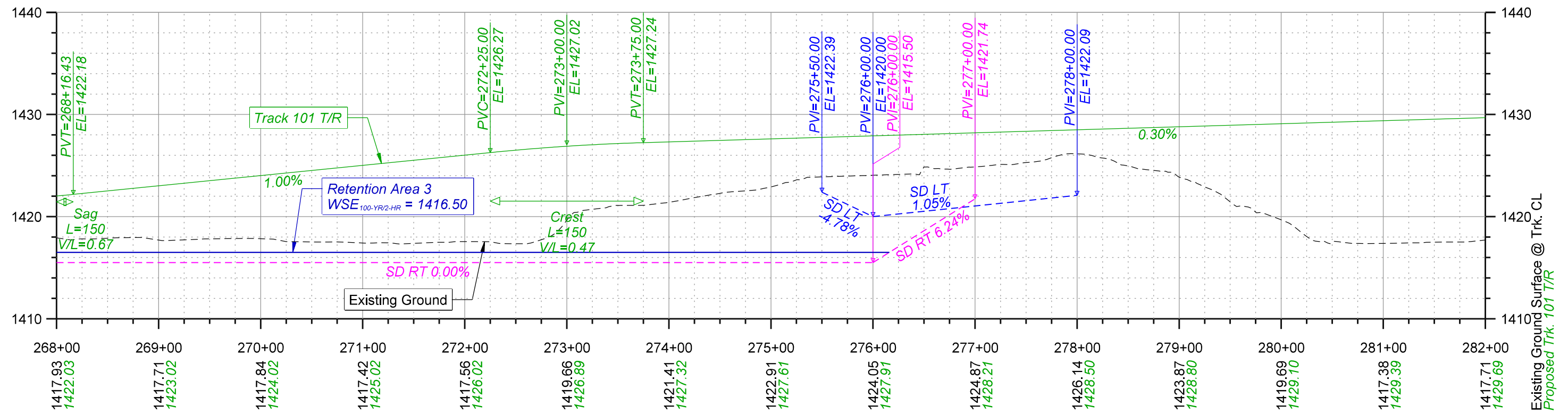
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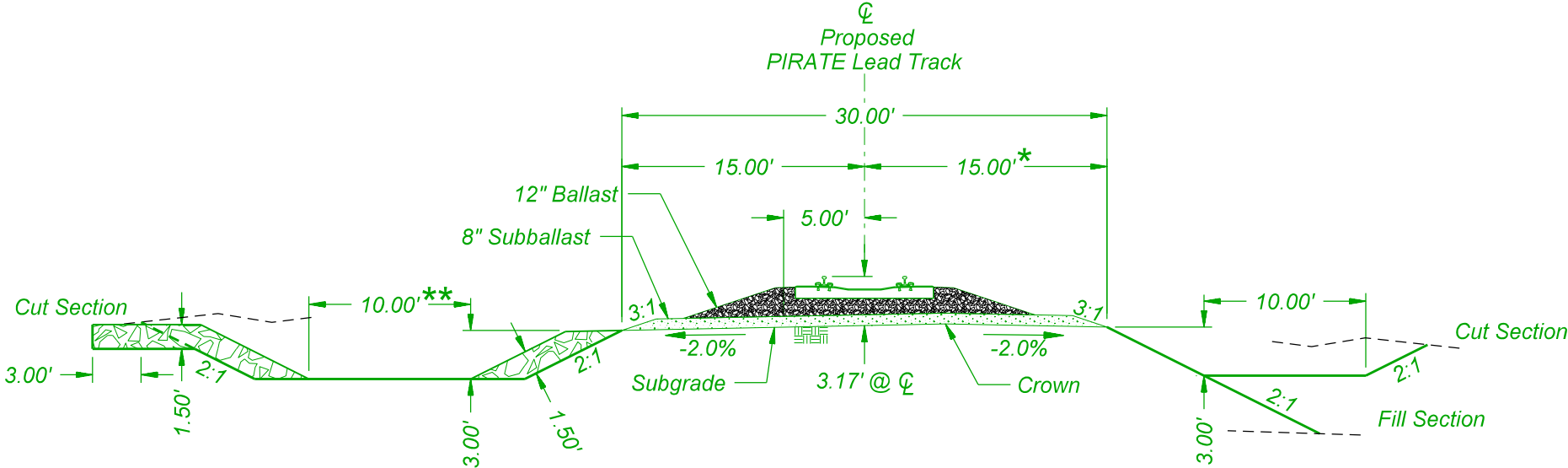
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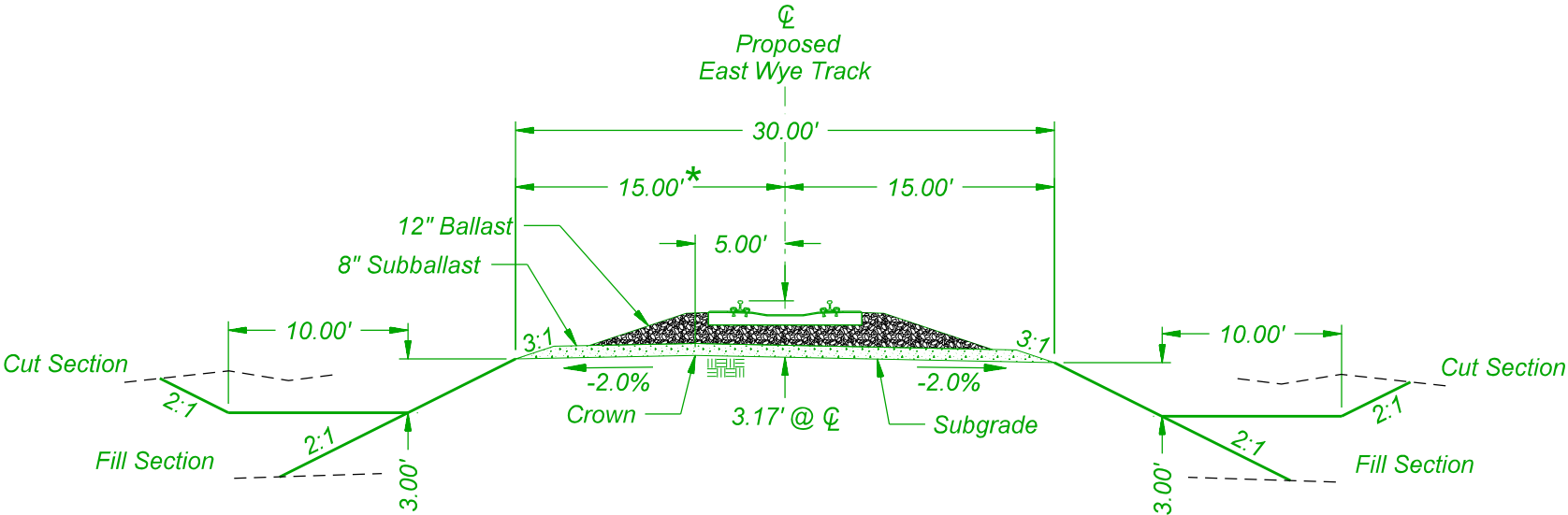


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* Shoulder Widens to Accomodate Superelevation, Refer to Cross Sections
** Ditch Width Varies, Refer to Cross Sections



TYPICAL SECTION
Sta. 4+20 to Sta. 15+23



TYPICAL SECTION
Sta. 4+20 to Sta. 15+11

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		CHECKED BY: JRM	
		DATE: 11/21/2025	
		SHEET NUMBER T006 of 012	

The diagram illustrates the cross-section of the proposed PIRATE Lead Track. Key features include:

- Track Structure:** The track is 40.00' wide at the top, consisting of 25.00'* of 12" Ballast and 15.00'* of 8" Subballast. The track is centered on a 5.00' wide access road.
- Access Road:** The access road is 5.00' wide and is flanked by 3:1 slopes. It has a -2.0% crown slope.
- Subgrade:** The subgrade is 3.17' wide at the centerline (CL) and has a -2.0% slope.
- Surrounding Terrain:** The track is situated on a 3.00' high embankment. The left side shows a cut section with a 2:1 slope, and the right side shows a cut section with a 2:1 slope.
- Dimensions:** The total width of the embankment is 23.50'. The track is 17' wide at the base. The access road is 10.00' wide at the base.

The diagram illustrates the cross-section of the Proposed PIRATE Lead Track. Key features and dimensions include:

- Track Structure:** The track consists of a 3.17' wide center section (labeled "3.17' @ $\varnothing$ ") with a 5.00' width (labeled "5.00' **") and a 30.00' total width (labeled "30.00'"). The track is composed of 12" Ballast and 8" Subballast layers.
- Grading and Slopes:** The track is graded at -2.0% on both sides. The slopes are 3:1 on the left and 3:1 on the right. The subgrade is shown below the ballast layers.
- Dimensions and Distances:**
 - 10.00' distance from the left cut section to the track centerline.
 - 15.00'* distance from the track centerline to the right cut section.
 - 17' distance from the track centerline to the right cut section.
 - 23.50' distance from the track centerline to the right cut section.
 - 3.00' distance from the track centerline to the right cut section.
 - 1.50' distance from the track centerline to the right cut section.
 - 3.00' distance from the track centerline to the right cut section.
- Sections:** The diagram shows a "Cut Section" on the left and a "Cut Section" on the right. The "Fill Section" is indicated on the left side of the track.
- Other Labels:** "Crown" is labeled at the center of the track, and "Subgrade" is labeled below the ballast layers.

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