



September 14, 2026

Ms. Elizabeth Webster  
Surface Transportation Board (Docket No. FD 36873)  
395 E Street SW  
Washington, DC 20423

Electronically submitted to: [www.stb.gov](http://www.stb.gov)

**RE: Union Pacific Acquisition of Norfolk Southern (Docket No. FD 36873)**

Dear Surface Transportation Board:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Surface Transportation Board's Docket No. FD 36873, which requests comments for the upcoming National Environmental Policy Act (NEPA) evaluation of the proposed acquisition of Norfolk Southern Corporation by the Union Pacific Corporation. The Transaction would involve: (1) changes in operations (e.g., an increase in average trains per day) on certain segments of the combined rail network that would exceed the Board's thresholds for environmental review, (2) changes in activity at some rail yards and intermodal facilities that would exceed the Board's thresholds for environmental analysis, and (3) capital improvements to increase capacity along the Union Pacific (UP) and Norfolk Southern (NS) mainlines, and expand UP and NS yards and intermodal facilities.

Affected facilities situated within Arizona include the UP rail lines that follow Interstate 8 (I-8) from Yuma to Gila Bend, roughly follow State Route 238 (Maricopa Road) through Maricopa and south to Casa Grande, and are then co-located along Interstate 10 until they cross into New Mexico. In addition to the increased rail traffic expected along the route, a ~4.8 mile long capital improvement project referred to as the Mohawk-To-Stoval Double Track is situated between Dateland and the Mohawk Mountains in Yuma County, Arizona.

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 (ESA) 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. For your consideration, the Department provides the following comments based on the agency's statutory

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authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

### **Mohawk-To-Stoval Double Track Capital Improvements Project**

The Sonoran pronghorn, which is federally listed as endangered under the ESA, is known to occur in the vicinity of the Mohawk-To-Stoval Double Track capital improvements project that is situated along I-8 mileposts 57-62, west of Dateland, Arizona.

- The Department recommends contacting the [U.S. Fish and Wildlife Service](#)<sup>1</sup> (USFWS) for their Technical Assistance. The USFWS will provide options to comply with the ESA, such as conservation measures to avoid or minimize adverse effects to listed species.

Maintaining habitat connectivity is a priority for the Department, and wildlife movement corridors are important for wildlife to respond to changing environmental conditions.

- Please refer to [Guidelines for Bridge Construction to Accommodate Fish & Wildlife Movement and Passage](#)<sup>2</sup>, found on the Department's website, and [Wildlife Crossing Structure Handbook Design and Evaluation in North America](#)<sup>3</sup>, and incorporate guidance as appropriate for bridge reconstruction. More specifically, steep steps and rip-rap are difficult for many species to traverse. If a concrete floor is installed underneath the bridge that creates a steep shelf or step, at least a portion of it, preferably close to one of the edges (i.e. not in the middle of the drainage), should have a sloped ramp that allows wildlife to move along the drainage unobstructed.

Please review the [Arizona Department of Agriculture's website](#)<sup>4</sup> for a list of prohibited and restricted noxious weeds and the [Arizona Native Plant Society](#)<sup>5</sup> for recommendations on control methods.

- To minimize the potential introduction or spread of exotic invasive species, precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site.

Please ensure the project complies with [Arizona Native Plant Law regulations](#)<sup>6</sup>.

- A Native Plant Inventory may need to be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under the Arizona Native Plant Law.
- In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts.

The trees and/or vegetation within the project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA) and protected under state law. Breeding season for birds in the project vicinity is generally mid-January through late June.

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<sup>1</sup> <https://www.fws.gov/office/arizona-ecological-services/contact-us>

<sup>2</sup> <https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/>

<sup>3</sup> [https://www.fhwa.dot.gov/clas/ctip/wildlife\\_crossing\\_structures/](https://www.fhwa.dot.gov/clas/ctip/wildlife_crossing_structures/)

<sup>4</sup> <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>

<sup>5</sup> <https://aznps.com/invas>

<sup>6</sup> <https://agriculture.az.gov/plantsproduce/native-plants>

- The Department recommends any removal and/or trimming of trees/vegetation occur outside the bird breeding season to limit impacts.
- If it is anticipated the project will not be in compliance with MBTA, the Department recommends contacting the USFWS for technical assistance. The USFWS will provide options to comply with the MBTA.

#### **Additional Recommendations**

In addition to the site specific recommendations for the Mohawk-To-Stoval Double Track capital improvements project described above, the Department recommends the Surface Transportation Board include the following in the Environmental Impact Statement:

- A discussion of wildlife collision data associated with the current UP operations, and an analysis of the anticipated changes to the number of wildlife-train collisions as a result of the increased capacity and number of trains per day.

Thank you for the opportunity to provide input on the Union Pacific Acquisition of Norfolk Southern (Docket No. FD 36873). For further coordination, please contact Cheri Bouch r at [cboucher@azgfd.gov](mailto:cboucher@azgfd.gov) or 623-236-7615.

Sincerely,

A handwritten signature in blue ink that reads "Callie Ritter". The signature is stylized with a large, looping "C" and a long, sweeping "R".

for

Callie Cavalcant

Habitat, Evaluation, and Lands Branch Chief

AZGFD #M26-08204048