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July 10, 2006

Sam Elters
State Engineer

E1-2466
DHW

Mr. Scott Steinwert
CirclePoint
135 Main Street, Suite 1600.
San Francisco, CA 94105

Re: **US70 & Proposed Arizona Eastern Railroad Alignment**
Response to STB Inquiry

Dear Mr. Steinwert:

I'm responding to your June 13, 2006 letter requesting comments on the proposed 10-mile Arizona Eastern Railway spur to the Phelps Dodge San Juan Mine which would cross US70 east of Safford. In particular, this letter addresses potential environmental impacts, transportation resources which could be affected, and any permits and approvals which are required by ADOT for the proposed new alignment.

For context and reference, I offer the following remarks about US70 in the vicinity of the contemplated new railroad spur:

- It is functionally classified as a rural minor arterial in a fringe urban area.
- Current average daily traffic is about 8,000 vehicles per day and is anticipated to increase by about 30% in the next 20 years.
- Presently, US70 is a two-lane, two-way highway posted at 55 mph.
- It is roughly parallel to the Gila River and crosses the San Simon River near the proposed rail crossing.
- ADOT is in the late planning stages of widening US70 to a five-lane section to deal with the growth in this urbanizing area. Construction of these improvements is not yet programmed in our Five Year Plan but we realistically anticipate start of work in the next six to eight years.
- Our long-term vision of the US60/US70 corridor from Phoenix to Lordsburg, New Mexico is to develop an alternate non-controlled route to I10 by providing four-lane divided segments in rural areas and five-lane segments in urban areas. US60/US70 is a shorter route to New Mexico than I10.

From an environmental perspective, the rail spur should reduce traffic on US70 and associated accidents, congestion, hazardous materials incidents, and noise by commensurately decreasing the number of trucks that would otherwise be needed to haul acid, copper, supplies, and materials. The decrease in truck traffic also helps the public by saving wear and tear on ADOT's highway and structures. This new rail line will not reduce the current heavy truck traffic between the Morenci and Miami Mines.

An important aspect of this concept is the fact that both US70 as well as the proposed railroad lie within the floodplain of the San Simon River only about a mile above the confluence with the Gila River. The potential influence of floodwaters dammed by the railroad on adjacent homes and businesses should be carefully scrutinized. The highway bridge above the San Simon River is the highest point in the area. The rail bed could actually reduce flooding on one side while increasing flood intensity on the other side. Also, FEMA floodplain maps might need to be updated if a large, linear feature such as a new railroad alignment is constructed. US70 now experiences overtopping during larger storm events (10+ year recurrence intervals) and is constrained to remain so because we may not further impede the flow of water in the floodplain.

From a cultural point of view, the railroad line should financially benefit the residents of Graham County as reduced shipping costs make mining activities more profitable and viable. The upshot of new industry and jobs in this community has broad support. As the valley develops further, it would not be unreasonable to hope that users other than Phelps Dodge would also want access the spur.

If the proposed railroad alignment is pursued as an at-grade crossing, the obvious negative effect is the delay incurred by the traveling public and the potential for train-vehicle and vehicle-vehicle accidents at the crossing. Timing of the two anticipated train crossings a day can mitigate delays and AERR would be prudent to schedule rail movement during highway off-peak hours. Some increase in travel time will still be experienced and transit by emergency service providers is always a serious problem associated with at-grade rail crossings. We note that US70 is the designated detour route for I10 between Lordsburg, New Mexico and Willcox, Arizona when accidents, dust storms, and winter storms close the interstate. Collectively, these are fairly infrequent and unpredictable, numbering about 10 times a year. Expansion of the Phelps Dodge mine, changes in mine processes or production, and use of the spur by those other than Phelps Dodge all have the potential to increase the number and length of trains crossing US70 on a daily basis which all can create additional delay to the public and increase the number of accidents.

If the new railroad alignment is reasonably close to the San Simon River, one concept that merits further investigation is the possibility of constructing a highway bridge that spans over both the river and the railroad when US70 is widened. The bridge over the San Simon River must be reconstructed regardless although not nearly as high as it would need to be to pass over the railroad. There are several examples in the state where the highway passes over both a railroad and a parallel channel. Although the initial capital outlay would be greater, it may be worth the expense in terms of smoother traffic operations, electrical costs, safety, drainage, flexibility for future use, and greater independence of AERR from ADOT.

Finally, any entity working within ADOT right-of-way must first secure an encroachment permit from the Safford District Office. Although the permit is issued without charge, it does obligate the permittee to maintain safe flow of traffic, provide both temporary and permanent erosion protection measures, and construct all highway improvements to ADOT standards. The permittee is also obligated to provide third-party testing, inspection, and project management for the duration of the project. Securing an ADOT encroachment permit does not waive the railroad's need to obtain other permits as prescribed by law such as 404 permits and so on.



Thank you for the opportunity to comment on this important project. We look forward to working with AERR, the STB, and other community stakeholders in the development of this concept. Please contact me if you have any questions.

Respectfully,

William D. Harmon, P.E.
District Engineer

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