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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stephen A. Owens
Director

#A-6769
FD 34836

March 3, 2008

Diana Wood, Section of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: STB Finance Docket No. 34836
Draft Environmental Assessment for Arizona Eastern Railway
Construction and Operation, Graham County, Arizona

Dear Ms. Wood:

The Air Quality Division appreciates the opportunity to review the "Draft Environmental Assessment, Arizona Eastern Railway (AZER) – Construction and Operation – In Graham County," received February 25, 2008. We understand the proposed railway would provide the Phelps Dodge Mine and Safford Airport with an alternative to truck shipment of materials, which your estimates projected would result in reduced air emissions.

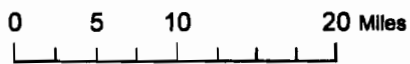
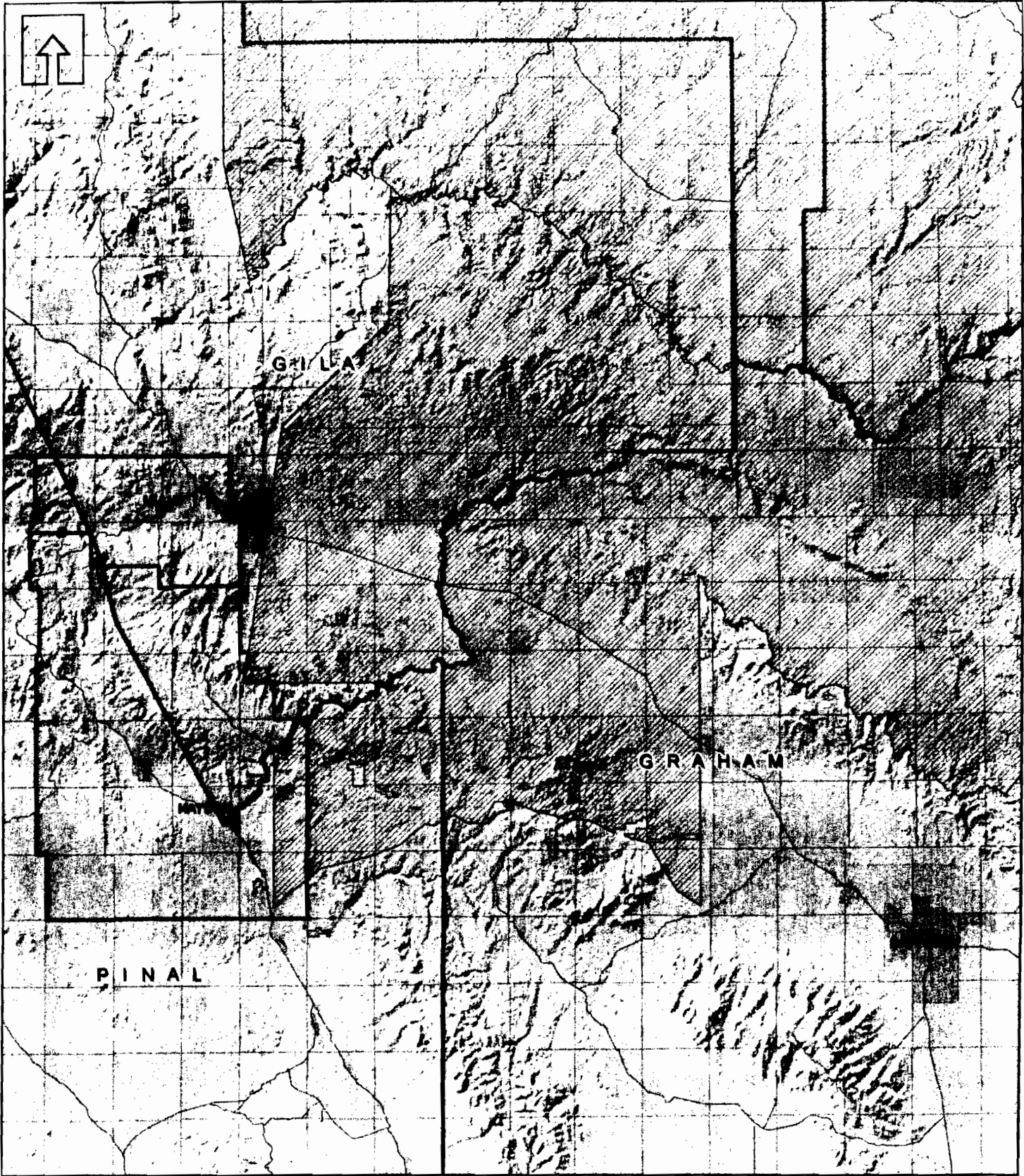
Staff of the Air Quality Division previously has reviewed the proposed project that was submitted for a General Conformity Determination with the Arizona State Implementation Plan in accordance with Clean Air Act Section 176(c)(1); 58 Federal Register 63214-63259; Title 40 Code of Federal Regulations Part 51, Subpart W §§ 51.850-51.860; Title 40 Code of Federal Regulations Part 93, Subpart B §§ 93.150-160; and Arizona Administrative Code R18-2-348 (approved into the Arizona State Implementation Plan April 23, 1999; effective June 22, 1999). The Air Quality Division concluded on July 12, 2006 that a General Conformity Determination was not required because the 12-mile construction site was not in a Nonattainment or Maintenance area.

Although the Safford area is not in a nonattainment area or maintenance area for any National Ambient Air Quality Standard (NAAQS) criteria pollutant, approximately 50 miles to the West in portions of Pinal and Gila Counties, is the Hayden-Miami Nonattainment Area for Particulate Matter (PM). Refer to the enclosed map. To minimize adverse impacts on public health and welfare, information was provided in 2006 that included practices and procedures that would reduce disturbance of PM during the construction of the rail line, which may temporarily increase ambient PM levels (A.A.C. R18-2-604 through -607; R18-2-804).

Particulate matter 10 microns in size and smaller can penetrate the lungs of human beings and animals and is subject to a to protect public health and welfare. Particulate matter 2.5 microns in size and smaller is difficult for lungs to expel and has been linked to increases in death rates; heart attacks by disturbing heart rhythms and increasing plaque and clotting; respiratory infections; asthma attacks and cardiopulmonary obstructive disease (COPD) aggravation. It is also subject to a NAAQS.

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Hayden and Miami PM₁₀ Nonattainment Areas



PM10 Nonattainment Area	County
Cities	Township/Range
	Native American Lands

Arizona Subcounty Population Projections
 July 1, 2006 to July 1, 2012
 by County, Census County Division, Place, and Reservation

	2006	2007	2008	2009	2010	2011	2012
Graham County	36,873	36,271	36,688	37,064	37,441	37,814	38,180
Bonita-Klondyke CCD	2,510	2,538	2,566	2,593	2,620	2,648	2,671
Swift Trail Junction CDP (part)	1,082	1,081	1,101	1,120	1,139	1,157	1,175
Remndr of Bonita-Klondyke CCD	1,448	1,457	1,465	1,473	1,481	1,489	1,496
Pima CCD	4,158	4,213	4,270	4,325	4,381	4,434	4,487
Pima town	2,105	2,125	2,144	2,163	2,182	2,200	2,218
Remainder of Pima CCD	2,051	2,088	2,126	2,162	2,199	2,234	2,269
Safford CCD	24,244	24,497	24,748	24,995	25,241	25,478	25,710
Safford city	9,387	9,413	9,439	9,464	9,489	9,514	9,537
Swift Trail Junction CDP (part)	1,496	1,537	1,577	1,617	1,657	1,696	1,733
Thatcher town	4,662	4,769	4,875	4,979	5,083	5,184	5,282
Remainder of Safford CCD	8,699	8,778	8,657	8,934	9,011	9,085	9,157
San Carlos CCD	4,982	5,023	5,082	5,141	5,200	5,258	5,312
Peridot CDP (part)	892	892	892	892	892	892	892
Remainder of San Carlos CCD	4,070	4,131	4,190	4,249	4,308	4,364	4,420
Reservation							
San Carlos (part)	4,918	4,971	5,024	5,076	5,127	5,177	5,226
Total Reservation	4,918	4,971	5,024	5,076	5,127	5,177	5,226
Total Non-Reservation	30,955	31,300	31,642	31,978	32,314	32,637	32,955

Sources: Arizona Department of Economic Security, Research Administration, Population Statistics Unit, 12/01/06.
 Seago / DES Population Statistics approved June 6, 2007

Graham County Population Projections 2006 - 2055

TABLE 1. Components of Population Change

Year	Population	Change	%Change	Net Migration	Change	%Change	Births	Change	%Change	Deaths	Change	%Change
2006	35,873	-	-	265	-	-	450	-	-	287	-	-
2007	36,271	398	1.109470%	241	-14	-5.480188%	461	11	2.444444%	304	17	5.823345%
2008	36,666	395	1.086024%	241	0	0.000000%	468	7	1.518436%	314	10	3.289474%
2009	37,054	388	1.058201%	232	-9	-3.734440%	475	7	1.486728%	319	5	1.562357%
2010	37,441	387	1.044422%	236	4	1.724136%	484	9	1.884737%	333	14	4.388715%
2011	37,814	373	0.988234%	223	-13	-5.508475%	494	10	2.088116%	344	11	3.303303%
2012	38,180	366	0.987865%	217	-8	-2.890583%	503	9	1.821862%	354	10	2.908977%
2013	38,557	377	0.987428%	227	10	4.808295%	509	6	1.182843%	359	5	1.412428%
2014	38,936	378	0.982860%	231	4	1.762115%	513	4	0.789855%	365	6	1.671306%
2015	39,307	371	0.952846%	228	-5	-2.164502%	518	3	0.584765%	371	6	1.643836%
2016	39,681	374	0.951484%	236	10	4.424778%	519	3	0.581385%	381	10	2.895418%
2017	40,047	366	0.922356%	230	-8	-2.542373%	519	0	0.000000%	383	2	0.524834%
2018	40,412	365	0.911428%	237	7	3.043478%	519	0	0.000000%	391	8	2.068773%
2019	40,770	358	0.885875%	234	-3	-1.285823%	522	3	0.578035%	398	7	1.780281%
2020	41,119	349	0.858022%	234	0	0.000000%	525	3	0.574713%	410	12	3.015075%
2021	41,468	350	0.851188%	238	4	1.709402%	525	0	0.000000%	413	3	0.731707%
2022	41,823	354	0.853650%	245	7	2.941178%	529	4	0.761805%	420	7	1.694915%
2023	42,174	351	0.839251%	246	1	0.408163%	529	0	0.000000%	424	4	0.952381%
2024	42,504	330	0.782473%	244	-2	-0.813008%	532	3	0.567108%	448	22	5.188679%
2025	42,848	344	0.809336%	258	12	4.918033%	535	3	0.563910%	447	1	0.224215%
2026	43,183	335	0.781833%	259	3	1.171875%	538	3	0.560748%	462	15	3.355705%
2027	43,526	343	0.794294%	278	13	4.905880%	550	7	1.288134%	465	3	0.649351%
2028	43,871	348	0.795514%	278	1	0.359712%	559	9	1.638384%	483	18	3.870868%
2029	44,220	336	0.759883%	273	-8	-2.150538%	565	6	1.073345%	489	6	1.242236%
2030	44,575	318	0.715863%	257	-18	-5.880606%	574	9	1.592820%	502	13	2.658487%
2031	44,933	314	0.708635%	252	-5	-1.945525%	583	9	1.567844%	512	10	1.982032%
2032	45,297	314	0.694788%	253	1	0.388825%	590	7	1.200886%	517	5	0.876563%
2033	45,650	312	0.680777%	263	10	3.852569%	601	11	1.864407%	529	12	2.321083%
2034	46,000	313	0.678341%	262	-1	-0.380228%	608	7	1.164725%	541	12	2.288431%
2035	46,355	304	0.654397%	256	-4	-1.528718%	618	10	1.644737%	558	17	3.142329%
2036	46,708	297	0.635172%	250	-8	-3.100775%	629	11	1.778635%	563	5	0.886057%
2037	47,056	287	0.609812%	242	-5	-2.068116%	638	7	1.112878%	575	12	2.131439%
2038	47,403	280	0.591428%	237	-10	-4.219409%	643	7	1.100629%	581	6	1.043478%
2039	47,752	272	0.571153%	227	-7	-3.063700%	652	9	1.388888%	583	12	2.065404%
2040	48,100	264	0.551206%	220	-4	-1.816182%	659	7	1.073820%	599	8	1.335556%
2041	48,449	255	0.529468%	216	-4	-1.816182%	667	8	1.213881%	607	12	1.978636%
2042	48,799	246	0.508117%	207	-9	-4.168887%	675	8	1.185185%	619	8	1.282407%
2043	49,148	238	0.488108%	195	-12	-5.797101%	683	8	1.185185%	627	5	0.797448%
2044	49,498	227	0.464232%	187	-8	-4.102864%	688	5	0.732084%	632	5	0.791136%
2045	49,848	217	0.441730%	184	-4	-2.380852%	698	10	1.453488%	637	2	0.313972%
2046	50,198	207	0.419521%	151	-13	-9.271523%	703	5	0.718332%	639	11	1.721440%
2047	50,548	194	0.391532%	137	-14	-9.271523%	709	6	0.853485%	643	3	0.461539%
2048	50,898	186	0.373822%	125	-12	-8.759124%	716	7	0.987300%	649	6	0.918836%
2049	51,248	171	0.342488%	107	-18	-14.400000%	724	8	1.117318%	653	4	0.609800%
2050	51,598	160	0.319381%	103	-4	-3.783189%	728	0	0.000000%	663	4	0.609800%
2051	51,948	147	0.282478%	88	-17	-16.504854%	728	2	0.276482%	669	9	1.363636%
2052	52,298	134	0.265568%	77	-9	-10.465116%	728	1	0.137383%	687	-2	-0.298954%
2053	52,648	121	0.239410%	65	-12	-15.584416%	731	2	0.274348%	672	5	0.749625%
2054	52,998	121	0.239410%	65	-12	-15.584416%	731	2	0.274348%	675	3	0.446429%
2055	53,348	121	0.239410%	65	-12	-15.584416%	731	2	0.274348%	675	3	0.446429%

Source: Arizona Department of Economic Security, Research Administration, Population Statistics Unit.
 Population projected by Demographic Cohort-Component Population Model.
 Approved by Arizona Department of Economic Security Director, March 31, 2006.