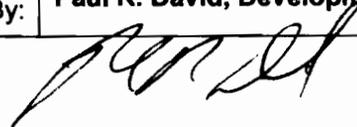


ARIZONA DEPARTMENT OF TRANSPORTATION
STB DRAFT ENVIRONMENTAL ANALYSIS REVIEW COMMENTS

#E1-7057
FD 34836
JAW

Project Name:	US 70 AZER Railroad Spur Crossing	Project No:	STB Finance Docket #34836
Reviewed By:	Paul R. David, Development Engineer	Discipline/Office:	Safford District Development



Item No	Reference	Comment	Disposition	
			Initial	Final
1	SEA Cover Letter	Paragraph 4 – The SEA lists the relatively low number of existing and projected future vehicle trips and the low frequency and short duration of projected train trips as the criteria for warranting an at grade crossing. As described this sounds very subjective. The warrant analysis criteria are not present in this EA nor have they been provided to the ADOT Safford District for review.		
2	Executive Summary – 1	Paragraph 2 – Phelps Dodge has been purchased by the Freeport McMoRan Gold & Copper Company. This change of ownership should be in this EA.		
3	Executive Summary – 1	Paragraph 3 - There is a desire by the City of Safford to construct an industrial park at the airport but there is no existing current demand or need. A front page news article in yesterday's local paper discussed placing a prison at the airport, not an industrial park.		
4	Executive Summary – 2	Paragraph 3 - The statement that the reduction or elimination of truck traffic to the mine as a result of the railroad spur is a spurious claim. The nearby FMI Morenci Mine has an active rail spur yet still requires over half of their supplies to be delivered by trucks which travel along US 70.		
5	Executive Summary – 2	Paragraph 1 – The transport of copper anodes and sulfuric acid by the AZER is just one small component of the material transport required by the mine. The FMI Morenci Mine has an active rail spur yet they continue to ship anodes and acid by truck on US 70.		
6	Page 3-2	Paragraph 5 – US 70 is correctly listed as a 2 lane highway within the project area. A construction project is scheduled for June of 2008 to increase this segment to 3 lanes as a result of increasing traffic volumes and concerns expressed by residents that a protected center turn lane be added.		
7	Page 3-11	Paragraph 6 – The AADT for 2005 was used by not 2006 data which shows an increase of 15% in traffic volume in one year.		
8	Page 3-13	The historical growth rate derived from linear interpolation is 1.85%. The growth rate fails for both 2006 and 2007. The impact on traffic by a rail crossing will be greater than the model predicts.		
9	Page 3-13	The existing and future traffic volume tables are missing the percentage of trucks, which is critical information. Many trucks and school buses are required by law to stop at railroad tracks. The tracks will create traffic impacts and some minor queuing even when trains are absent.		
10	Page 3-10	The delays of the railroad crossing on first responders and the is not addressed in this draft EA.		
11	Page 4-1	Paragraph 5 – Does the phrase "Below the Gila River" refer to downstream or South of the Gila River?		

			Disposition	
12	Page 4-5	Unless the AZER is currently employing 0.5 – 1.0 person per lane mile of existing track the claim that 12 miles of track will provide 6 – 12 jobs is suspect. There is no footnote citing a source for this claim.		
13	Page 4-8	Paragraph 4 - Rather than include a generalization about fires on trains why not list the safety record for AZER. Within the last month a locomotive was destroyed by fire near Globe. Because of current track conditions and budgetary problems I believe that the AZER has a much higher incident rate than national and regional carriers. This accident rate should be listed and utilized when discussing the probability of spills, accidents and fires.		
14	Page 4-9	Paragraph 1 – The future configuration for US 70 which will begin design in 2010 is for a 5 lane section, not the listed 4 lane. This project is listed in the report as unfunded which is untrue. A costly and comprehensive Design Concept Review has been completed and funds for design have been allocated by the state. This project is not on the District's "wish list" but on our construction list.		
15	Page 4-10	Paragraph 4 - While LOS B & LOS C are acceptable for future (20 year) plans the degradation of LOS from A to B is a serious matter that should be mitigated. Small, medium and large developments are required by ADOT's Safford District to mitigate their capacity degradations with both safety and capacity improvements. Other than some federally mandated safety features at the crossing this Draft EA does not require any capacity improvements to be made by the AZER.		
16	Page 4-11	Paragraph 2 - Sight distance for AZER motor vehicles entering US 70 from the access roads is not addressed. These vehicles will be looking through crossing arm equipment and bridge barriers for crossing traffic. Using current standards these access roads would probably not receive an encroachment permit due to the crest vertical curve which is currently present.		
17	Page 4-19	Paragraph 4 – The SEA conclusion that the Proposed Action will have a minimal impact on natural drainage, sedimentation and erosion patterns does not address the flooding created by the upstream impoundment of water by the railroad bed. Why isn't flooding specifically discussed? There are no studies or sources cited in the very general conclusions of this paragraph.		
18	Page 6-1	The proposed traffic mitigation measures only cover construction and raising the at grade crossing to the level of the bridge deck. How about some meaningful mitigations such as an extra lane for trucks and buses which must stop at the tracks or incorporating the layout of the soon to be constructed five lane configuration so that the crossing arms and other safety devices only have to be constructed once, not now and then later.		