

Appendix B

Agency Coordination Letters

Jacobs-Donoghue, Christine

From: James J. Lemmon [JLemmon@azdot.gov]
Sent: Monday, October 26, 2009 10:51 AM
To: Paki Rico
Cc: Jacobs-Donoghue, Christine; Stapp, Scott H.
Subject: FW: 2009.10.06 letter for project 010 PM 247.0 H7583 01L/ BLUESHEET

Fyi – the AZGFD wants to stay involved. Please place their response in the project files. Thank you, Jim

From: Mike Demlong [<mailto:MDemlong@azgfd.gov>]
Sent: Friday, October 23, 2009 1:40 PM
To: James J. Lemmon
Cc: Project Evaluation Program; Daniel E. Nelson; Shawn Lowery; Mike Ingraldi
Subject: RE: 2009.10.06 letter for project 010 PM 247.0 H7583 01L/ BLUESHEET

RE: 2009.10.06 letter for project 010 PM 247.0 H7583 01L

Dear Mr. Lemmon,

Thank you for notifying the Department regarding the proposed improvements to I-10 between Ina Road TI and Ruthrauff Road TI in the Tucson metropolitan area.

Due to the short notice we are likely unable to attend the meeting on October 28th, but request to have continued involvement with this project as it progresses. Please continue to notify Laura Canaca, John Windes, Shawn Lowery, and myself as the project progresses.

In general, our involvement will focus on ensuring: 1) existing wildlife populations and their habitat are not negatively impacted or eliminated by the proposed activities, 2) existing wildlife corridors are not disrupted or eliminated, and 3) new structures or designs (e.g., bridges, fences, sound walls, culverts, landscaping, etc.) are “wildlife friendly”.

As you know, the Canada del Oro and the Rillito Rivers intersect the Santa Cruz River corridor in the project area. Although these large washes are partially concrete lined they have some value to wildlife moving in and out of the adjacent urban areas. This usage is demonstrated by the occasional javelina and other wildlife mortalities that occur along this section of I-10. It is unknown whether mule deer moving through this area, but we know they are at the OMNI National Golf Course up stream on the CDO. Reconstruction or replacement of these bridges would provide an opportunity to continue to provide, and/or incorporate, bat friendly designs into bridge engineering with simple modifications. Documentation exists of bats utilizing bridges up and down these river corridors during the summer months. In addition, encouraging bats to continue utilizing these corridors would also help with mosquito abatement activities the County is trying around the Santa Cruz River. At no charge! To maintain wildlife connectivity between populations and habitat, bridge clearance height, view shed, and other features should also be maintained and/or improved.

The aforementioned concerns are not meant to be an all inclusive list, but instead to create early awareness during your planning process.

Again, thank you for ensuring our continued involvement as the project progresses.

Best regards,
Mike

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2009



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

GOVERNOR
JANICE K. BREWER
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DIRECTOR
LARRY D. VOYLES
DEPUTY DIRECTORS
GARY R. HOVATTER
ROBERT D. BROSCHEID



October 22, 2009

ADOT
c/o Paki Rico
Gordley Design Group, Inc.
2540 N. Tucson Blvd.
Tucson, AZ 85716

Dear Mr. Rico:

The Arizona Game and Fish Department (Department) has validated and verified the On-line Environmental Tool receipt (#20090930010218) you submitted. There were no Listed Threatened or Endangered species identified within 3 miles of your project site. There was, however, a Candidate Species (Yellow-billed Cuckoo) identified within 3 miles of your project site. We suggest you contact the U.S. Fish and Wildlife Service regarding the proximity of Yellow-billed Cuckoo.

The Department appreciates the opportunity to provide comments early in the planning and design stages of the proposed project. We would like to continue this coordinated effort and offer additional site-specific guidance that will help conserve wildlife and their habitats, including sensitive, threatened, non-game and game species. If you have any questions regarding this letter, please contact me at 623 236-7513.

Sincerely,

Daniel E. Nelson
Project Evaluation Specialist

Cc: John Windes, AGFD; Debra Bills USFWS.



M E M O R A N D U M
Pima County Natural Resources, Parks and Recreation



To: Christine Jacobs-Donoghue, HDR
From: Steve Anderson, Planning Manager *-SA*
Date: October 15, 2010
Re: I-10, Ina Road TI to Ruthrauff Road TI

Thank you for meeting with us this morning. Here's the trails element of what will be impacted by the project:

1. CDO River Park. The CDO River Park passes under Interstate 10, and will need approximately 25' minimum width on both banks of the river behind the rail to accommodate both the paved and soft (DG) pathways. The 25' will allow the slimmed-down River Park to accommodate both paths.

2. Rillito River Park. The Rillito River Park also passes under Interstate 10, and we'll need approximately 25' minimum on each bank (behind the rail) to accommodate both the paved and soft (DG) pathways. Again, the 25' will allow the slimmed-down River Park to accommodate both paths.

3. Santa Cruz River Park Interconnect. This interconnect is located on the easement that Pima County Wastewater Management acquired from the property owners from El Camino del Cerro to (roughly) Ina Road. It was just paved (Jamie Rivera was the project manager) and lacks only the bridges to make it a functional path on anything other than the Rillito River. I'm aware of three items you'll need to take into consideration (to start); the Sunset Road connection, the Orange Gove Road connection, and the frontage road right-of-way width moving a short distance to the west. We'll work with you so we can find a way that the Interconnect can cross Sunset Road effectively. Orange Grove Road will be similar. The width of the right-of-way probably won't cause a problem, but we'll have to take a look at it along with representatives from your firm.

Again, thank you for meeting with us.



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8661 FAX (520) 740-8171

C. H. HUCKELBERRY
County Administrator

October 27, 2009

Arizona Department of Transportation
Attn: James J. Lemmon, NEPA Planner
Environmental Planning Group
206 South Seventeenth Avenue
Phoenix, Arizona 85007-3213

Arizona Department of Transportation
c/o Paki Rico, Community Relations
Gordley Design Group
2540 N. Tucson Blvd.
Tucson, Arizona 85716

Re: Santa Cruz River-Rillito Connection Project, Tucson, Arizona

Dear Mr. Lemmon and Ms. Rico:

Thank you for providing Natural Resources, Parks and Recreation Director Rafael Payan, the detailed scope of your impending Interstate 10, Ina Road to Ruthrauff Road TI design project.

Pima County is planning a major river park project that requires joint coordination with Arizona Department of Transportation's TI project in the area. The County project will connect the Santa Cruz and the Rillito River Parks that may result in modifications to the bridges that cross the Rillito River in Tucson, Arizona.

Pima County staff appreciates the opportunity to meet with the appropriate person(s) in your agencies to coordinate this major river park project. I have asked our project managers John Spiker of Regional Flood Control District and Steve Anderson of Natural Resources, Parks and Recreation to contact your office to further discuss the coordination of our projects.

Please email the names and contact information of the designated project manager(s) to my assistant, Lisa Matthews, at lisa.matthews@pw.pima.gov. If you have any questions, please contact me at (520) 740-8480.

We look forward to working with Arizona Department of Transportation on this effort.

Sincerely,

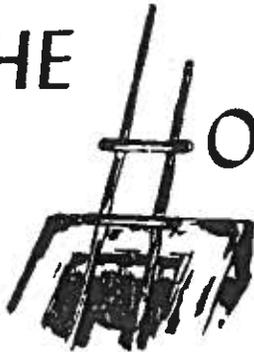
A handwritten signature in cursive script, appearing to read "N. Slusser".

Nanette M. Slusser
Assistant County Administrator for Policy

NMS:lsm

c: John M. Bernal, Deputy County Administrator, Public Works
Steve Anderson, Principal Planner, Pima County Natural Resources, Parks and Recreation
John Spiker, Civil Engineering Manager, Regional Flood Control District

THE HOPI TRIBE



CHAIRMAN

VICE-CHAIRMAN

October 28, 2009

James J. Lemmon, NEPA Planner
Arizona Department of Transportation
206 South Seventeenth Ave
Phoenix, Arizona 85007-3213

Re: Interstate 10, Ina Road to Ruthrauff Road 010 PM 247.0 H7583 01L

Dear Mr. Lemmon,

Thank you for your correspondence dated October 6, 2009, regarding the Federal Highway Administration (FHWA), Arizona Department of Transportation, and Regional Transportation Authority in Pima County preparing an Environmental Assessment on a proposal to improve Interstate 10 between Ina Road and Ruthrauff Road in Tucson. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Arizona, and the Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties. Therefore, we appreciate the FHWA and ADOT's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office considers the archaeological sites of our ancestors to be Traditional Cultural Properties. We recommend that archaeological coordination should be initiated as early as possible, and look forward to continuing consultation on this proposal including being provided with a copy of cultural resources survey report on the area of potential effects for review and comment. If prehistoric cultural resources are identified that will be adversely affected by project activities, we also look forward to continuing consultation in the development of any proposed treatment plans.

Should you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,

Leigh J. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

cc: Arizona State Historic Preservation Office

Raki Rico, Gordley Design Group, Inc. 2540 N. Tucson Blvd., Tucson, AZ 85716



NORTHWEST FIRE/RESCUE DISTRICT

SERVING RESIDENTS OF THE NORTHWEST FIRE DISTRICT, THE FLOWING WELLS COMMUNITY
AND THE TOWN OF MARANA

Administration/Life Safety Services ◊ 5225 W. Massingale Rd. ◊ Tucson, Arizona 85743
PH: (520) 887-1010 ◊ FAX: (520) 887-1034 ◊ www.northwestfire.org

FACSIMILE TRANSMITTAL SHEET

TO: <i>PAKI RICO</i>	FROM: <i>AL PESQUEIRA</i>
COMPANY: <i>ADOT</i>	DATE: <i>10/28/09</i>
FAX NUMBER: <i>520-327-4687</i>	NO. OF PAGES INCLUDING COVER PAGE: <i>3</i>
PHONE NUMBER:	RE: <i>SHANNON Rd / EL CAMINO del Cerro WQARF SITE</i>

[] URGENT [] FOR REVIEW [] FOR YOUR FILES [] PER YOUR REQUEST [] PLEASE COMMENT

Attached:

1. *ADEQ Meeting Notice w/contact #'s
Melissa Hayes 520-770-3309
ADEQ*
2. *Area of concern starts @ EL CAMINO
del Cerro and moves NORTH ACROSS I-10.*



**NORTHWEST
FIRE/RESCUE DISTRICT**

Albert R. Pesqueira
Assistant Chief

Admin./Life Safety Services
5225 W. Massingale Road
Tucson, AZ 85743-8416

Phone: (520) 887-1010 x 2902
Fax: (520) 887-1034
apesqueira@northwestfire.org

Albert R. Pesqueira



MEETING NOTICE

STATE OF ARIZONA • OFFICIAL NOTICE OF PUBLIC MEETING

Pursuant to A.R.S. §38-431.02, notice is hereby given to the members of the Shannon Road/El Camino del Cerro Water Quality Assurance Revolving Fund (WQARF) Site Community Advisory Board (CAB) and to the general public that the Shannon Road/El Camino del Cerro CAB will hold its regular meeting on:

**Tuesday, February 3, 2009, from 6:00 pm to 7:30 pm
at the Ellie Towne Flowing Wells Community Center,
Large Multi-Purpose Rooms - #2 and #3,
1660 W. Ruthrauff Rd. (east of Romero Rd.), Tucson, Arizona**

AGENDA:

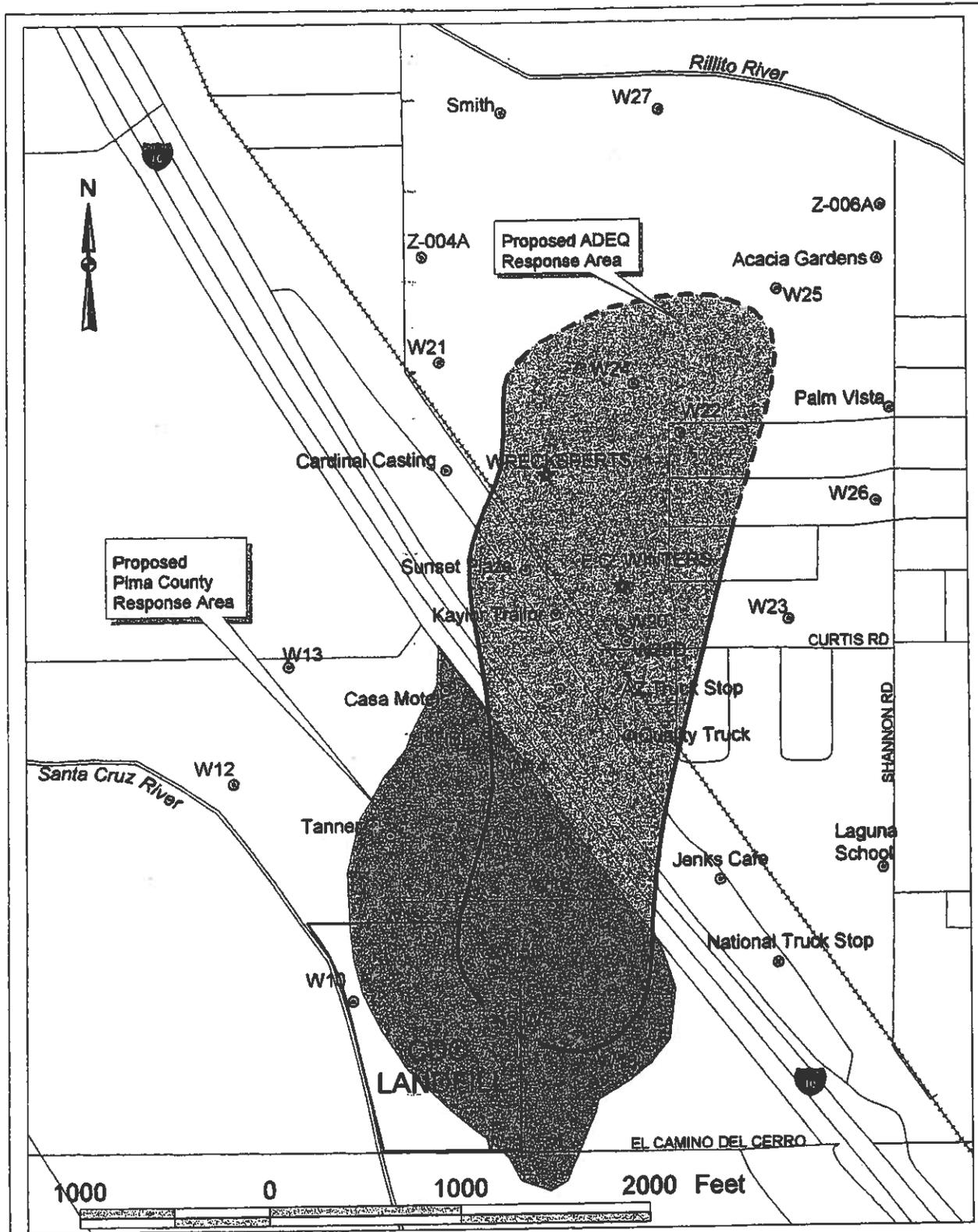
1. Call to Order/Introductions – Randy Abbey, CAB Co-Chair
2. Approval of Minutes for 10/21/08 CAB Meeting
3. Nomination/Election of CAB Co-Chairs for Next Term
4. Site Investigation Update/Q&A – Sherri Zendri, ADEQ Project Manager
5. Presentation on Water Resources and Groundwater Use in the Shannon Road/El Camino del Cerro WQARF Site as They Relate to the Tucson Region – Sherri Zendri
6. Call to the Public*
7. CAB Discussion, Vote and Co-Chair Signing of Amendment to Charter Indicating Change of Location of Information Repository
8. CAB Outreach/Membership Discussion
9. Other Administrative Business – Melissa Hayes, ADEQ Community Involvement Coordinator
10. Next Meeting Date/Agenda Discussion
11. Adjournment

The meeting is open to the public and anyone may attend without prior notice.

*This is the time for the public to comment. Members of the board may not discuss items that are not specifically identified on the agenda. Therefore, pursuant to A.R.S. §38-431.01(G), actions taken as a result of public comment will be limited to directing staff to study the matter, responding to criticism, or rescheduling the matter for further consideration and decision at a later date.

For additional information about this meeting, contact Melissa Hayes at (520) 770-3309 or at hayes.melissa@azdeq.gov. You can learn more about ADEQ programs and public meetings by visiting our Web site at: www.azdeq.gov. Persons with disabilities may request a reasonable accommodation, such as sign language interpreter, by contacting Juana Bonilla at (602) 771-4189 or (800) 234-5677; at the introduction, press 1 for English, 2 for Spanish, then dial 771-4189 when instructed. Requests should be made as early as possible to allow time to arrange the accommodation.

Posted 1/20/09 (34) mah



- WQARF Site Registry Boundary
- Inferred Site Boundary
- Roads
- Riverbeds and Washes
- Railroad

- PASI
- Well Locations



**EL CAMINO DEL CERRO
WQARF SITE**

**FEBRUARY 2000
TUCSON, ARIZONA**

Jacobs-Donoghue, Christine

From: Paki Rico [paki@gordleydesign.com]
Sent: Wednesday, October 28, 2009 2:36 PM
To: Bertram, Michael H.; Stapp, Scott H.; Jacobs-Donoghue, Christine
Subject: FW: Design Concept Report & Environmental Assessment, 010 PM 247.0 H7583 01L
Attachments: 406-882-266, Ina Rd TI - IH-10 crossing, Marana, AZ.pdf

FYI below and attached. We will log this information in our files. Thanks.

--

Paki Rico
Public Involvement Specialist
Gordley Design Group, Inc.
2540 North Tucson Boulevard
Tucson, Arizona 85716
(520) 327-6077, x-110 - tel
(520) 327-4687 - fax
paki@gordleydesign.com
www.gordleydesign.com

----- Forwarded Message

From: "Sword, Colin M [Ericsson Contractor for Sprint]" <Colin.Sword@sprint.com>
Date: Wed, 28 Oct 2009 10:41:23 -0500
To: "paki@gordleydesign.com" <paki@gordleydesign.com>
Conversation: Design Concept Report & Environmental Assessment, 010 PM 247.0 H7583 01L
Subject: Design Concept Report & Environmental Assessment, 010 PM 247.0 H7583 01L

Paki,

I have reviewed your proposal and you will find, included herein, the crossing, just west of Ina Road, of Sprint facilities, from the eastbound access road to the UPRR r/w on the north side of the westbound access road. Sprint is six feet under the access roads and 20 feet under the elevated highway approach on the west side of Ina Road.

Please review the included documents and get back with me if you have any questions. The attached documentation is proprietary property and shall be treated as confidential to ADOT and may not be distributed outside the requirements of this design concept Report.

If, in fact, this project will be Federally funded, and if Sprint will be required to relocate it's facilities, Sprint will be submitting estimated costs for reimbursement at the time of the 60% design release.

Please contact me if you need further assistance.

Colin Sword / Ericsson Services for Sprint Nextel Corp.

Field Services Support

Facilities Engineer, OSP Engineering & Const – West
401 W. Harrison Street
Phoenix, Arizona 85003
Cell # (602) 430-3615
Office # (602) 417-0970

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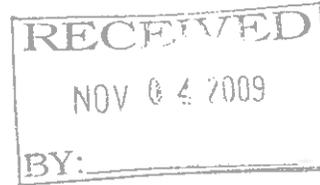
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----- End of Forwarded Message



SOUTHWEST GAS CORPORATION

November 3, 2009



Arizona Department of Transportation
c/o Gordley Design Group
Attn: Paki Rico
2450 N. Tucson Boulevard
Tucson, AZ 85716

**RE: Interstate 10, Ina Road TI to Ruthrauff Road TI DCR and EA
ADOT Tracs No. 010 PM 247.0 H7583 01L**

Dear Ms. Rico:

Thank you for requesting Southwest Gas' (SWG) issues and concerns regarding the above-referenced project. SWG has several facilities within the limits of this project; these approximate locations and type of facilities are summarized below:

Distribution Facilities

- west side of west frontage road from Sweetwater Drive to 1000' south of Sunset Road
- crossing I-10 at approximate alignment of Curtis Road
- west side of west frontage road from Ina Road to Hartman Lane

Distribution and High Pressure Facilities

- west side of frontage road from Walker Road to Ina Road

High Pressure Facilities

- crossing I-10 at Ina Road traffic interchange

Of particular concern to SWG will be impacts to the high pressure facilities crossing I-10 at the Ina Road traffic interchange. Please be aware that due to seasonal demands, relocation of high pressure gas facilities is limited to April through September.

We have provided maps showing the approximate location of our facilities within the project limits. All information is provided for reference use only. Potholing and Blue Stake are suggested for best accuracy when locating SWG facilities. Please be aware that SWG requires a minimum one-foot separation from distribution facilities and any proposed structures and two feet of separation from high pressure gas facilities.



Ms. Paki Rico
November 3, 2009
Page 2

SWG requires a stand-by when the contractor is working within 10 feet of high pressure gas facilities. The contractor must call (520) 794-6021 to schedule the stand-by a minimum of 24 hours in advance. The contractor must also contact SWG for adjusting valves at least two weeks prior to the start of construction by calling (520) 794-6018. Please add information regarding valve adjustments and high pressure stand-by to the general notes and special provisions.

SWG requests to be included on the distribution of future submittals and final plans in order to verify further if SWG facilities will be in conflict with proposed improvements.

If you have any questions or require any additional information, please contact me at (520) 794-6043.

Sincerely,

Melanie O. Rice

Melanie O. Rice, P.E.
Engineer II
Southern Arizona Division

Attachment: Facility maps (3)



SFPP, L.P.
Operating Partnership

November 4, 2009

ENG 4-2-1 (302.0 to 305.0 – 117)
(120.0 to 125.0 – 54)
(317.0 to 321.0 – 6)

File Reference #09-921-1

Arizona Department of Transportation
c/o Paki Rico
Gordley Design Group, Inc.
2540 N. Tucson Blvd
Tucson AZ 85716

Re: I-10 Ina Road Traffic Interchange (TI) to Ruthrauff Road TI Design Concept Report (DCR) and Environmental Assessment

Dear Mr. Paki Rico:

This is in reply to your letter dated October 6, 2009, requesting utility information at the following locations; Ina Road, Orange Grove Road, Sunset Road, Ruthrauff Road, Canada del Oro Wash and Rillito River in the City of Tucson, Arizona.

Enclosed are drawings of Line Section 117, sheets 20, 21, 22, 23; Line Section 54 (NIS), sheet 6; and Line Section 6 (NIS) sheet 34 that depict the general alignment of Kinder Morgan's (KM) 12, 6 & 8-inch high pressure refined petroleum products pipelines.

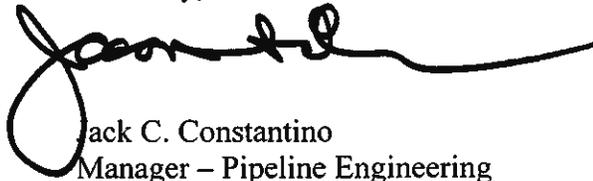
In the interest of public safety and for pipeline protection, the following provisions must be considered in the design and subsequent construction of improvements near KM's pipelines.

1. Prior to submitting detailed plans for KM review, the exact pipeline locations can only be determined by potholing. The potholes must be performed by hand excavation every 50 feet and in the presence of a pipeline representative by contacting Kinder Morgan Area Manager, Mr. Brad Lewis (520) 514-1065 Ext 100, at least two weeks prior to commencement of work.
2. When preliminary project plans have been formulated, based upon the field determination (surveyed potholes) of existing substructures, please forward a full sized set of drawings, showing KM pipelines in plan and profile relative to the proposed improvements and existing conditions. Upon review of the drawings KM will provide you the necessary provisions for pipeline protection when working near these facilities. Provisions may also, include cost related to third party design and construction documents and third party inspection services.

3. Adherence to provisions enumerated in the enclosed copy of L-O&M 200-29 "Guidelines for Design and Construction" relating to proposed project affecting Kinder Morgan pipelines.
4. No work in the vicinity of KM's active or inactive pipelines may proceed without the presence and approval of KM's on-site representative.

Please refer to File Reference number 09-921-1 in future correspondence concerning this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack C. Constantino", with a long horizontal flourish extending to the right.

Jack C. Constantino
Manager – Pipeline Engineering

T: Quinn/letters/ENG4-2-1/09-921-1/JCC

Enclosures

cc: Brad Lewis w/enclosures



Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

Name of Company: _____

The list of design, construction and contractor requirements, including but not limited to the following, for the design and installation of foreign utilities or improvements on KM right-of-way (ROW) are not intended nor do they waive or modify any rights KM may have under existing easements or ROW agreements. Reference existing easements and amendments for additional requirements. This list of requirements is applicable for KM facilities on easements only. Encroachments on fee property should be referred to the ROW Department.

Design

- KM shall be provided sufficient prior notice of planned activities involving excavation, blasting, or any type of construction on KM's ROW to determine and resolve any location, grade or encroachment problems and provide protection of our facilities and the public **before** the actual work is to take place.
- Encroaching entity shall provide KM with a set of drawings for review and a set of final construction drawings showing all aspects of the proposed facilities in the vicinity of KM's ROW. The encroaching entity shall also provide a set of as-built drawings showing the proposed facilities in the vicinity of KM's ROW.
- Only facilities shown on drawings reviewed by _____ (Company) will be approved for installation on KM's ROW. All drawing revisions that effect facilities proposed to be placed on KM's ROW must be approved by KM in writing.
- KM shall approve the design of all permanent road crossings.
- Any repair to surface facilities following future pipeline maintenance or repair work by KM will be at the expense of the developer or landowner.
- The depth of cover over the KM pipelines shall not be reduced nor drainage altered without KM's written approval.
- Construction of any permanent structure, building(s) or obstructions within KM pipeline easement is **not** permitted.
- Planting of shrubs and trees is not permitted on KM pipeline easement.
- Irrigation equipment i.e. backflow prevent devices, meters, valves, valve boxes, etc. shall not be located on KM easement.
- Foreign line, gas, water, electric and sewer lines, etc., may cross perpendicular to KM's pipeline within the ROW, provided that a minimum of two (2) feet of vertical clearance is maintained between KM pipeline(s) and the foreign pipeline. Constant line elevations must be maintained across KM's entire ROW width, gravity drain lines are the only exception. Foreign line crossings below the KM pipeline must be evaluated by KM to ensure that a significant length of the KM line is not exposed and unsupported during construction. When installing underground utilities, the last line should be placed beneath all existing lines unless it is impractical or unreasonable to do so. Foreign line crossings above the KM pipeline with less than 2 feet of clearance must be evaluated by KM to ensure that additional support is not necessary to prevent settling on top of the KM hazardous liquids pipeline.
- A foreign pipeline shall cross KM facilities at as near a ninety-degree angle as possible. A foreign pipeline shall not run parallel to KM pipeline within KM easement without written permission of KM.
- The foreign utility should be advised that KM maintains cathodic protection on their pipelines. The foreign utility must coordinate their cathodic protection system with KM's. At the request of KM, foreign utilities shall install (or allow to be installed) cathodic protection test leads at all crossings for the purposes of monitoring cathodic protection. The KM Cathodic Protection (CP) technician and the foreign utility CP technician shall perform post construction CP interference testing. Interference issues shall be resolved by mutual agreement between foreign utility and KM. All costs associated with the correction of cathodic protection problems on KM pipeline as a result of the foreign utility crossing shall be borne by the foreign utility for a period of one year from date the foreign utility is put in service.
- The metallic foreign line shall be coated with a suitable pipe coating for a distance of at least 10 feet on either side of the crossing unless otherwise requested by the KM CP Technician.



Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

- AC Electrical lines must be installed in conduit and properly insulated.
- DOT approved pipeline markers shall be installed so as to indicate the route of the foreign pipeline across the KM ROW.
- No power poles, light standards, etc. shall be installed on KM easement
- No pipeline may be located within 50 feet (15 meters) of any private dwelling, or any industrial building or place of public assembly in which persons work, congregate, or assemble.

Construction

- Contractors shall be advised of KM's requirements and be contractually obligated to comply.
- The continued integrity of KM's pipelines and the safety of all individuals in the area of proposed work near KM's facilities are of the utmost importance. Therefore, contractor must meet with KM representatives prior to construction to provide and receive notification listings for appropriate area operations and emergency personnel. **KM's on-site representative will require discontinuation of any work that, in his opinion, endangers the operations or safety of personnel, pipelines or facilities.**
- The Contractor must expose all KM pipelines prior to crossing to determine the exact alignment and depth of the lines. A KM representative must be present. In the event of parallel lines, only one pipeline can be exposed at a time.
- KM will not allow pipelines to remain exposed overnight without consent of KM designated representative. Contractor may be required to backfill pipelines at the end of each day.
- A KM representative shall do all line locating. A KM representative shall be present for hydraulic excavation. The use of probing rods for pipeline locating shall be performed by KM representatives only, to prevent unnecessary damage to the pipeline coating.
- Notification shall be given to KM at least 72 hours before start of construction. A schedule of activities for the duration of the project must be made available at that time to facilitate the scheduling of Kinder Morgan, Inc.'s work site representative. Any Contractor schedule changes shall be provided to Kinder Morgan, Inc. immediately.
- Heavy equipment will not be allowed to operate directly over KM pipelines or in KM ROW unless written approval is obtained from (Company). Heavy equipment shall only be allowed to cross KM pipelines at locations designated by Kinder Morgan, Inc. Contractor shall comply with all precautionary measures required by KM to protect its pipelines. When inclement weather exists, provisions must be made to compensate for soil displacement due to subsidence of tires. Equipment excavating within ten (10) feet of KM Pipelines will have a plate guard installed over the teeth to protect the pipeline.
- Excavating or grading which might result in erosion or which could render the KM ROW inaccessible shall not be permitted unless the contractor/developer/owner agrees to restore the area to its original condition and provide protection to KM's facility.
- A KM representative shall be on-site to observe any construction activities within ten (10) feet of a KM pipeline or aboveground appurtenance. The contractor **shall not** work within this distance without a KM representative being on site. Only hand excavation shall be permitted within two (2) feet of KM pipelines, valves and fittings unless State requirements are more stringent. However, proceed with extreme caution when within three (3) feet of the pipe.
- A KM representative will monitor construction activity within 25 feet of KM facilities during and after the activities to verify the integrity of the pipeline and to ensure the scope and conditions agreed to have not changed. Monitoring means to conduct site inspections on a pre-determined frequency based on items such as: scope of work, duration of expected excavator work, type of equipment, potential impact on pipeline, complexity of work and/or number of excavators involved.
- Ripping is only allowed when the position of the pipe is known and not within ten (10) feet of KM facility unless company representative is present.
- Temporary support of any exposed KM pipeline by Contractor may be necessary if required by KM's on-site representative. Backfill below the exposed lines and 12" above the lines shall be replaced with sand or other selected material as approved by KM's on-site representative and thoroughly compacted in 12" lifts to 95% of standard proctor dry density minimum or as approved by KM's on-site representative. This is to adequately protect against stresses that may be caused by the settling of the pipeline.



Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

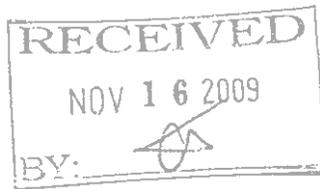
- No blasting shall be allowed within 1000 feet of KM's facilities unless blasting notification is given to KM including complete Blasting Plan Data. A pre-blast meeting shall be conducted by the organization responsible for blasting. KM shall be indemnified and held harmless from any loss, cost of liability for personal injuries received, death caused or property damage suffered or sustained by any person resulting from any blasting operations undertaken within 500 feet of its facilities. The organization responsible for blasting shall be liable for any and all damages caused to KM's facilities as a result of their activities whether or not KM representatives are present. KM shall have a signed and executed Blasting Indemnification Agreement before authorized permission to blast can be given.

No blasting shall be allowed within 300 feet of KM's facilities unless blasting notification is given to KM a minimum of one week before blasting. *(note: covered above)* KM shall review and analyze the blasting methods. A written blasting plan shall be provided by the organization responsible for blasting and agreed to in writing by KM in addition to meeting requirements for 500' and 1000' being met above. A written emergency plan shall be provided by the organization responsible for blasting. *(note: covered above)*

- Any contact with any KM facility, pipeline, valve set, etc. shall be reported immediately to KM. If repairs to the pipe are necessary, they will be made and inspected before the section is re-coated and the line is back-filled.
- KM personnel shall install all test leads on KM facilities.
- Burning of trash, brush, etc. is not permitted within the KM ROW.

Insurance Requirements

- All contractors, and their subcontractors, working on Company easements shall maintain the following types of insurance policies and minimum limits of coverage. All insurance certificates carried by Contractor and Grantee shall include the following statement: "Kinder Morgan and its affiliated or subsidiary companies are named as additional insured on all above policies (except Worker's Compensation) and waiver of subrogation in favor of Kinder Morgan and its affiliated or subsidiary companies, their respective directors, officers, agents and employees applies as required by written contract." **Contractor shall furnish Certificates of Insurance evidencing insurance coverage prior to commencement of work and shall provide thirty (30) days notice prior to the termination or cancellation of any policy.**
1. Statutory Coverage Workers' Compensation Insurance in accordance with the laws of the states where the work is to be performed. If Contractor performs work on the adjacent on navigable waterways Contractor shall furnish a certificate of insurance showing compliance with the provisions of the Federal Longshoreman's and Harbor Workers' Compensation Law.
 2. Employer's Liability Insurance, with limits of not less than **\$1,000,000** per occurrence and **\$1,000,000** disease each employee.
 3. Commercial General Liability Insurance with a combined single limit of not less than **\$2,000,000** per occurrence and in the aggregate. All policies shall include coverage for blanket contractual liability assumed.
 4. Comprehensive Automobile Liability Insurance with a combined single limit of not less than **\$1,000,000**. If necessary, the policy shall be endorsed to provide contractual liability coverage.
 5. If necessary Comprehensive Aircraft Liability Insurance with combined bodily injury, including passengers, and property damage liability single limits of not less than **\$5,000,000** each occurrence.
 6. Contractor's Pollution Liability Insurance this coverage shall be maintained in force for the full period of this agreement with available limits of not less than **\$2,000,000** per occurrence.
 7. Pollution Legal Liability Insurance this coverage must be maintained in a minimum amount of **\$5,000,000** per occurrence.



U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

November 10, 2009

Paki Rico
c/o Arizona Department of Transportation
Gordley Design Group, Inc.
2540 North Tucson Boulevard
Tucson, Arizona 85716

Dear Mr. Rico:

This is in response to your request for comments on the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI Design Concept Report (DCR) and Environmental Assessment 010 PM 247.0 H7583 01L.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Pima (Community Number 040073), City of Tucson (Community Number 040076), and Town of Marana (Community Number 040118), Maps revised February 18, 1999. Please note that the City of Tucson, Town of Marana, and Pima County, Arizona are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any **development** must not increase base flood elevation levels. **The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

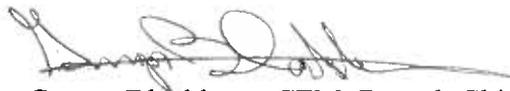
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Tucson floodplain manager can be reached by calling James P. Vogelsberg, Development Services Director, at (520) 837-4926. The Town of Marana floodplain manager can be reached by calling Keith Brann, Town Engineer, at 520-382-1999. The Pima County floodplain manager can be reached by calling Leo Smith, P. E., at (520) 243-1800.

If you have any questions or concerns, please do not hesitate to call Patricia Rippe of the Mitigation staff at (510) 627-7015.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

James P. Vogelsberg, Development Services Director, City of Tucson
Keith Brann, Town Engineer, Town of Marana
Leo Smith, P.E., Pima County
Steve Dolan, CAP Coordinator, Arizona Department of Water Resources, Office of Water Engineering
Patricia Rippe, Floodplanner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX



United States Department of the Interior



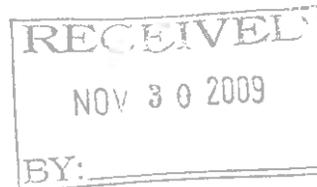
Fish and Wildlife Service
Arizona Ecological Services Field Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer to:
AESO/SE
22410-2010-TA-0026

November 23, 2009

Arizona Department of Transportation
c/o Paki Rico
Gordley Design Group, Inc.
2540 North Tucson Boulevard
Tucson, Arizona 85716

Project No.: 010 PM 247.0 H7583 01L



Dear Mr. Rico:

We have received correspondence from the Arizona Department of Transportation, requesting our review of the planned improvements to Interstate 10, between the Ina Road traffic interchange and the Ruthrauff Road traffic interchange. The project will begin at approximately milepost 247.5 and extend east to milepost 253.43 within the Tucson metropolitan area in Pima County, Arizona. The project proposal falls within the range of the lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*; LLNB), a species listed as endangered under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544). The project also includes habitat for the cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*; pygmy-owl), a species formerly listed as endangered under the Endangered Species Act. A final rule to remove the pygmy-owl from the Endangered Species list was published April 14, 2006. Therefore, the protective regulations of the Act no longer apply to the pygmy-owl. However, upon request, we continue to provide technical assistance related to the conservation of the pygmy-owl. The project area may contain habitat for the western burrowing owl (*Athene cunicularia hypugaea*), a sensitive bird protected by the Migratory Bird Treaty Act.

Potential impacts to the above species are related to the timing of the proposed project, ground disturbance, increased lighting, and the fact that some native vegetation in the Cañada del Oro Wash and the Rillito River may be affected by this project. Direct mortality of burrowing owls could occur if any are located within the project ROW. Impacts to the LLNB and the pygmy-owl are primarily related to habitat connectivity. Both the LLNB and the pygmy-owl may utilize the Cañada del Oro Wash and the Rillito River to move among blocks of suitable habitat during

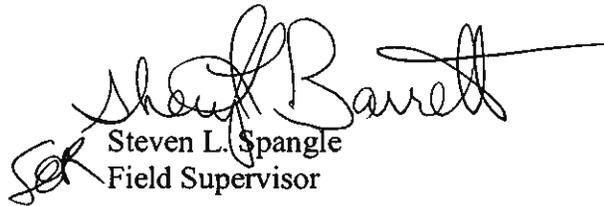
foraging, movements between forage sites and roost sites, and during dispersal. We make the following recommendations to promote habitat connectivity for the LLNB and the pygmy-owl, and to avoid direct mortality of the burrowing owl in relation to this project:

- Saguaros (*Carnegiea gigantea*) are an important forage resource for LLNBs and also provide nest substrates for pygmy-owls. We recommend that, if any saguaros occur within the project ROW, they be preserved in place or transplanted within the project vicinity. If saguaros are not salvageable, we recommend they be replaced with nursery stock at a 3:1 ratio in locations proximate to the project area.
- If project construction occurs during the time of year when LLNB are foraging on saguaros and agaves in adjacent areas (August – October) or when pygmy-owls are dispersing (July - September), we recommend actions be taken to reduce the impacts to the movements of these species. Impacts to both the LLNB and pygmy-owl can be minimized if work on the project is limited to daylight hours and/or supplemental lighting associated with construction is minimized.
- The Cañada del Oro Wash and the Rillito River provide important habitat linkages and travel corridors for the LLNB, the pygmy-owl, and other wildlife species. We recommend that, during the expansion or replacement of the bridges over these drainages, impacts to adjacent riparian vegetation be minimized. We recommend that, to the extent possible, design of these bridges promote wildlife crossing in the project area. Consideration of size and openness are important in the design of wildlife crossings.
- We encourage avoidance and preservation of large trees and shrubs during surface-disturbing activities to the maximum extent practicable, as well as maintaining the potential for wildlife to cross under this roadway. Temporarily disturbed areas in these drainages should be replanted with native trees, shrubs, and seed, including salvaged plants from areas that will be affected by this project.
- Permanent lighting adjacent to the Cañada del Oro Wash and the Rillito River should be avoided or minimized. Artificial lighting can affect nocturnal wildlife movements within these habitat linkages and travel corridors.
- Consider designing these bridges with features that promote bat roosting or installing bat-friendly roosting structures. Bats provide a significant benefit to the ecosystem and human welfare and this simple action can promote the conservation of these unique animals.
- The project site may also support suitable habitat for the burrowing owl, a species protected by the Migratory Bird Treaty Act and state laws. Burrowing owls prefer open areas and are often associated with burrowing mammals, although they have also been found in holes associated with cracked concrete sidewalks and soil cement, irrigation ditches, erosional features in washes, and culverts. If burrowing owls are present on the project site, they may be affected. We recommend following the guidelines set forth in the *Burrowing Owl Project Clearance Protocol* developed by the Arizona Burrowing Owl Working Group. A copy of this document can be found on the Arizona Game and Fish Department's website at http://www.azgfd.gov/pdfs/w_c/owl/BurrowingOwlClearanceProtocol.pdf.

This letter is not intended to express any requirement of, or conditions necessary for compliance with, the Endangered Species Act. Our comments are provided to you as technical assistance regarding how effects of the proposed project on listed or sensitive resources can be minimized, but they do not constitute legal requirements. It is likely that this project has a Federal nexus through the Federal Highway Administration and/or a 404 permit issued by the Corps of Engineers. The lead Federal agency will make a determination on the effects of this action on listed species and whether section 7 consultation, pursuant to the ESA, is required.

Should circumstances regarding this project change from the information provided to us, we recommend that you contact us for further review. If you have additional questions, please contact Scott Richardson at (520) 670-6150 (x 242) or Sherry Barrett at (x 223). Thank you for your consideration of endangered species.

Sincerely,



Steven L. Spangle
Field Supervisor

cc (hard copy):

Field Supervisor, Fish and Wildlife Service, Phoenix, AZ (2)
Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ

cc (electronic copy):

Army Corps of Engineers, Tucson, AZ (Attn: Marjorie Blaine)
Federal Highway Administration, Phoenix, AZ (Attn: Mary Frye)
Habitat Branch Chief, Arizona Game and Fish Department, Phoenix, AZ
Regional Supervisor, Arizona Game and Fish Dept., Tucson, AZ (Attn: John Windes)



U.S. Department
of Transportation
**Federal Highway
Administration**

ARIZONA DIVISION

4000 North Central Avenue
Suite 1500
Phoenix, Arizona 85012-3500
(602) 379-3646
Fax: (602) 382-8998
<http://www.fhwa.dot.gov/azdiv/index.htm>

July 6, 2011

In Reply Refer To:
010-D(211)N
HOP-AZ

010-D(211)N
TRACS No. 010 PM 247 H7583 01L
I-10, Ina Road TI to Ruthrauff Road TI
Section 4(f) Resources

Mr. Rafael Payan, Director
Pima County Natural Resources, Parks and Recreation Department
3500 West River Road
Tucson, Arizona 85741

Dear Mr. Payan:

The Arizona Department of Transportation (ADOT), in conjunction with the Federal Highway Administration (FHWA) and the Regional Transportation Authority, is planning improvements to approximately 6 miles of Interstate 10 (I-10) in the Tucson metropolitan area of Pima County, Arizona. The proposed project would extend from the Ina Road traffic interchange (TI) in Marana, through portions of unincorporated Pima County, to the Ruthrauff Road TI in Tucson.

The proposed project has the potential to affect Pima County-managed park and recreation resources protected under Section 4(f) of the Department of Transportation Act of 1966. This letter includes an evaluation of impacts to these resources and a summary of previous coordination efforts with the Pima County Natural Resources, Parks and Recreation Department (NRPRD). The purpose of this letter is to request your comments on our evaluation of the resources present and impacts to those resources, and to request your concurrence on the findings and our proposed method of mitigation for the impacts.

Project Location and Description

The project begins at I-10 milepost (MP) 247.50 and extends to the southeast to MP 253.43. Refer to Figure 1 for the project's location in the state and Figure 2 for the project vicinity.

The proposed project would include the following improvements to the freeway configuration:

- reconstructing I-10 from Ina Road to Ruthrauff Road to widen the roadway from three lanes in each direction to five lanes in each direction
- reconstructing the TIs at Ina Road, Sunset Road, and Ruthrauff Road to elevate the crossroads over I-10 and the Union Pacific Railroad
- raising the I-10 profile over Orange Grove Road to provide additional vertical clearance

- adding turn lanes at the frontage road and crossroad intersections along the corridor
- replacing the bridges over the Cañada del Oro Wash and the Rillito River to widen the roadway and to increase the freeboard over 100-year storm flows
- implementing local access changes at Ina Road and at Ruthrauff Road/El Camino del Cerro

The majority of improvements to the I-10 main line would take place within the existing ADOT right-of-way (ROW). Additional ROW will be necessary at the Mike Jacob Sports Park to accommodate realignment of the eastbound on-ramp from Ina Road, and private property easements and acquisition will be necessary for the TI reconfigurations at Ina Road, Sunset Road, and Ruthrauff Road.

Section 4(f) of the Department of Transportation Act of 1966

Section 4(f) of the Department of Transportation Act of 1966 (49 United States Code § 303) stipulates that FHWA and other Department of Transportation agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless there is no feasible and prudent alternative to the use of that land, and that the proposed action includes all possible planning to minimize harm to the property resulting from such use.

A “use” of a Section 4(f) resource, as defined in 23 Code of Federal Regulations § 774.17, occurs:

- (1) When land is permanently incorporated into a transportation facility;
- (2) When there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose ... ; or
- (3) When there is a constructive use of a Section 4(f) property ...

A constructive use of a Section 4(f) resource occurs when the transportation project does not incorporate land from the Section 4(f) resource, but the project’s proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. For example, a constructive use can occur as a result of an increase in noise levels or restrictions in access, or other impacts that could substantially impair aesthetic features or attributes of the resource.

In August 2005, Section 4(f) was revised to simplify the process and approval of projects with *de minimis* impacts to Section 4(f) resources. Under the revised provisions, projects determined to result in a *de minimis* impact are not required to undergo an analysis of avoidance alternatives, and once the project is determined to be *de minimis*, the Section 4(f) evaluation process is complete.

An impact to a park or recreation area may be determined to be *de minimis* if the transportation use of the Section 4(f) resource does not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f). Use of a Section 4(f) resource is allowed when a *de minimis* impact finding can be supported by FHWA with the written concurrence of the officials with jurisdiction over the Section 4(f) property. Further, the public must be provided an opportunity to review and comment on the project impacts to the resource.

Previous Coordination Efforts

ADOT held a meeting with NRPRD on October 15, 2010, to obtain Pima County's input on the proposed design approach and other issues (such as access) as they relate to NRPRD recreational facilities. During the meeting, ADOT solicited input from NRPRD representatives in attendance regarding existing and proposed uses for recreational facilities within the project area and requested Pima County's agreement regarding the properties identified as Section 4(f) resources. ADOT also presented the potential permanent and temporary impacts to the Section 4(f) resources, and discussed the proposed plans for maintaining access at each affected property during construction. ADOT will continue to coordinate with NRPRD to ensure continued agreement from Pima County regarding project-related impacts to the resources and the proposed mitigation measures.

A public meeting was held on March 10, 2011, during which the project team solicited comments from members of the public regarding project impacts to the recreational facilities. No comments regarding impacts to Section 4(f) properties were received at the meeting or have been received since.

Section 4(f) Evaluation of Impacts

Pima County-managed Section 4(f) resources identified within the project area are as follows: Mike Jacob Sports Park, Ted Walker Park, Cañada del Oro River Park, Rillito River Park, and Pima County's Regional Optimization Master Plan (ROMP) trail. Refer to Figure 3 for the locations of the evaluated properties in relation to the project area. These facilities are considered Section 4(f) properties because they are parks or recreation areas on public lands that are available for public use. These properties have been evaluated for impacts caused by the proposed transportation improvements. This evaluation has determined that the proposed project would not adversely affect the activities, features, and attributes of the properties. Each of these properties is discussed individually below.

Mike Jacob Sports Park Description of Resource

Mike Jacob Sports Park at 9601 N. Casa Grande Highway is an approximately 51-acre Pima County-owned park located west of I-10, between Ina Road and the Cañada del Oro Wash. The park abuts the eastbound (EB) I-10 frontage road, and is accessed directly from the frontage road. The attributes that qualify Mike Jacob Sports Park for protection under Section 4(f) are the existing and planned park facilities available for public use.

Park facilities currently available for public use are the parking lot, which is accessed directly from the EB I-10 frontage road, and the active recreational area situated west of the parking lot. The parking lot features landscaping along the frontage road ROW that partially blocks the line-of-sight of I-10 traffic. The active recreational area features facilities including two concession stands with restrooms, six baseball diamonds, covered pavilions, volleyball courts, and multiuse fields. Use and access to the active recreational area is managed by Pima County, and although it is available for public use, the facilities are only opened for scheduled events.

The undeveloped portion of the park is located south of the public parking lot—between the active recreational area and I-10—and is currently used to store materials and dirt for use by Pima County. An expansion concept plan for the park included in the Corazón de los Tres Ríos del Norte concept plan proposes three baseball diamonds and additional parking for this area. The proposed facilities would be set back from the EB I-10 frontage road.

A fenced area with structures is at the northernmost corner of the park next to the EB I-10 frontage road, and these structures are currently vacant or used for storage. This part of the park has been previously leased by private companies for different recreational uses, but is currently used only by Pima County. This area is not open to the public, and there are no current plans to develop the area or open it to the public; therefore, it does not contribute to the qualities that designate the property as a Section 4(f) resource.

Potential Impacts to Resource

The proposed project would raise Ina Road over I-10; therefore, the ramps and frontage roads would be realigned to accommodate the new elevation of the crossroad. At the park, the EB I-10 frontage road would be shifted to the southwest and raised as it approaches Ina Road.

The proposed project would require approximately 1.6 acre of ROW from Mike Jacob Sports Park along its entirety adjacent to the EB I-10 frontage road ROW; therefore, approximately 3 percent of the park would be permanently incorporated into a transportation facility, resulting in a “use.” As a result, approximately 15 percent of the designated parking spaces would be removed from the parking lot, and landscaping along the ROW would be removed. The new ROW would encroach on the undeveloped area of the park; however, direct impacts to proposed facilities qualifying the resource for protection are not anticipated. The amenities associated with the active recreation area are set back from I-10 and its EB frontage road, and would not be directly affected by the project.

A temporary roadway will be constructed to provide access from Ina Road west of the freeway to the EB I-10 frontage road during the TI reconstruction. Construction of the temporary roadway would encroach on the fenced storage area and would require a temporary construction easement from Pima County. Because the temporary roadway would affect only the fenced storage area, which has no qualities of a Section 4(f) resource, these activities would not result in a “use” of the resource. However, Pima County would be compensated for the loss of structures consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 Code of Federal Regulations § 24.102).

The proposed project would bring traffic approximately 25 feet closer to the park; thus, traffic noise levels at features qualifying the property for Section 4(f) protection closest to the roadway were evaluated (in the parking lot near the ROW and near the proposed baseball diamond).¹ Future traffic noise levels near the ROW are predicted to increase by 1 dBA as a result of the project, and future traffic noise levels near the proposed baseball diamond would decrease by

¹ *Final Noise Report: Interstate-10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI*, dated April 2011

1 dBA as a result of the project.² These changes in traffic noise levels would not be perceptible by the human ear; therefore, the future traffic noise levels would sound the same to patrons with or without the proposed project. The area currently experiencing the greatest public use is the active recreational area, which is set back from the freeway and frontage road and would not experience a perceptible increase in noise levels as a result of the project. Based on these considerations, and the nature of the activities at this facility (sports fields), the change in noise would be negligible and is not expected to substantially interfere with the use and enjoyment of the facility; therefore, no constructive use is anticipated.

Measures to Minimize Impacts

The proposed project would result in use of approximately 3 percent of the Section 4(f) property; however, impacts to attributes qualifying the resource for protection are limited to the removal of existing parking spaces and landscaping. ADOT is coordinating with Pima County to minimize or mitigate impacts to the resources by replacing lost parking on-site, reconstructing the driveway entrance to the parking lot, and replacing the affected landscaping, as well as maintaining access to the park during construction. The proposed improvements to I-10 and its frontage roads would not result in noise, visual, or aesthetic impacts to the patrons of Mike Jacob Sports Park because they currently experience traffic noise, visual, and aesthetic impacts associated with a nearby major freeway while enjoying the park's amenities. Because of the relatively small area of the park that would be converted, the existing nature of the resource, and coordination with Pima County, the identified impacts would not adversely affect the activities, features, or attributes qualifying the resource for protection under Section 4(f) and the impact would be *de minimis*.

Ted Walker Park

Description of Resource

Ted Walker Park at 6775 N. Casa Grande Highway is an approximately 10-acre Pima County-owned park located west of I-10, on the northern side of the Cañada del Oro Wash. The park is directly accessed from the EB I-10 frontage road. The park was closed in 2009 during construction of Pima County ROMP improvements (see *ROMP Trail* below) that involved disturbance in the park. The park is currently not actively maintained by Pima County, and it will remain closed to public use until further notice. Park amenities previously available to the public included a soccer field, a baseball field, restrooms, and parking.

Potential Impacts to Resource

No acquisition of ROW is proposed at Ted Walker Park. Project-related activities would take place within the existing ROW in this area; therefore, construction of the project would have no direct impacts on the park, and would not result in "use" of the resource. If the park reopens to the public, the proposed project would reflect existing transportation uses adjacent to the park

² The traffic noise analysis conducted for this project predicted traffic noise levels in 2030 would reach 75 dBA at the ROW and 78 dBA at the proposed baseball diamond during peak traffic volume if the project were not built. If the project were built, traffic noise levels are predicted to reach 76 dBA at the ROW and 77 dBA at the proposed baseball diamond during peak traffic volume.

and would not adversely affect the activities, features, or attributes qualifying the resource for protection under Section 4(f).

Measures to Minimize Impacts

The proposed project would not result in a “use” of the resource or adversely affect its activities, features, or attributes; therefore, no measures to minimize impacts are warranted. The project would not affect access to the park.

ROMP Trail Description of Resource

Consistent with the Pima County ROMP improvements developed in response to new Arizona Department of Environmental Quality environmental requirements, the Pima County Regional Wastewater Reclamation Department recently installed approximately 5 miles of pipeline connecting the Ina Road Water Pollution Control Facility to the Roger Road Water Pollution Control Facility. The pipeline alignment largely follows ADOT ROW along the I-10 EB frontage road—except between Curtis Street and El Camino del Cerro, where it trends farther west along property lines. A maintenance road has been constructed along the pipeline alignment, and NRPRD will develop a trail along the maintenance road to provide north–south linkage until planned facilities in Pima County’s Trail Master Plan can be developed in the area. Access to the trail would be at Ted Walker Park, and it would follow the ROMP maintenance road to El Camino del Cerro, where patrons could access the Santa Cruz River trail.

Portions of the ROMP trail would be located in existing ADOT ROW. These portions of the trail would not qualify as resources protected under Section 4(f) because the primary designation of ADOT ROW is for a transportation facility. Areas qualifying for protection under Section 4(f) would be areas outside of ADOT ROW designated for recreational use.

Potential Impacts to Resource

In Ted Walker Park, the trail would be located outside of the proposed project limits. Elsewhere, if the project results in impacts that require the pipeline or access road to be relocated, impacts to the trail would also be mitigated by relocating the trail to maintain continuity along its entirety.

The trail is being developed adjacent to a major transportation corridor, and construction of the project would remain consistent with the existing transportation uses. As proposed, the project is not expected to directly result in “use” of the resource or adversely affect the activities, features, or attributes qualifying the resource for protection under Section 4(f).

Measures to Minimize Impacts

The proposed project would not result in a “use” of the resource or adversely affect its activities, features, or attributes; however, if the project results in impacts to the pipeline or access road, the trail would be relocated to maintain continuity along its entirety.

Cañada del Oro River Park and Rillito River Park Description of Resources

Cañada del Oro River Park and Rillito River Park are linear parks that follow the Cañada del Oro Wash and Rillito River, respectively. Cañada del Oro River Park provides trail access between Oro Valley and the Santa Cruz River, and Rillito River Park provides trail access between Tucson and the Santa Cruz River. They both feature intermittent paved trails along the banks, ramp access to the washes, and trailheads at certain cross-streets along their entirety. Both parks cross the project area under the I-10 and I-10 frontage road bridges. As Cañada del Oro Wash approaches I-10 from the east, it features a paved trail above the southern bank that enters the wash east of the Union Pacific Railroad bridge. Within the project limits, the Cañada del Oro River Park does not feature a paved trail because it crosses under I-10 in the wash bottom. West of I-10, an unpaved access road/trail resumes above the northern bank of the wash. Within the project limits, the Rillito River features a paved trail above the southern bank. The trail briefly enters the wash under the Union Pacific Railroad bridge east of the project limits, and enters the wash west of the project limits.

The attributes that qualify the river parks for protection under Section 4(f) are the trails and trailhead amenities available for public use. Within the project area, amenities associated with the parks are intermittent trails along the banks and access to the washes.

Potential Impacts to Resources

The proposed project will involve replacing the I-10 main line bridges; however, the existing trail facilities would not be affected by construction. The trail along Cañada del Oro Wash crosses under I-10 in the wash bottom and, therefore, has no permanent facilities to be affected. The paved trail along the southern bank of the Rillito River is expected to remain intact during construction. If removal of the I-10 main line bridges requires the trail to be removed, the trail would be reconstructed consistent with existing conditions. Construction of the project would temporarily require that the existing trails be relocated in the washes. Access to the temporarily relocated trails and through-access under the bridges would be generally maintained for the duration of construction. Bridge demolition or other construction-related activities may require temporary trail closures in the project limits. The closures would occur for a limited duration and through-access for trail patrons would generally be available during construction. The project would not inhibit future development or improvements by Pima County.

As proposed, the project would not result in “use” of the resources or adversely affect the activities, features, or attributes qualifying the resources for protection under Section 4(f).

Measures to Minimize Impacts

The proposed project would not result in permanent impacts to the facilities associated with the trails. Through-access would be generally maintained for the duration of construction by relocating the existing trails in the washes. Trail closures during construction may be required, but would be temporary. The project would not inhibit future development or improvements by Pima County.

Conclusion

Properties protected under Section 4(f) within the project area would not be adversely affected by the proposed project. Approximately 3 percent of the Mike Jacob Sports Park would be incorporated into a transportation facility, resulting in "use" of the Section 4(f) resource; however, impacts to attributes qualifying the park for protection would be limited to the removal of parking spaces and landscaping. ADOT would coordinate with Pima County to replace lost parking areas and landscaping on-site, as well as maintaining access to the park during construction. If the project requires relocation of the ROMP pipeline, the associated access road and trail would also be relocated, thus maintaining continuity of the public resource.

The proposed project would not adversely affect the activities, features, or attributes that qualify the resources for protection under Section 4(f) in the project area. Therefore, project-related impacts to the resources would be *de minimis*.

We request your concurrence on the recreational resources that occur within the project area, on the impacts to those resources that would result from the proposed project, and on the proposed methods of mitigating these impacts. We further request your concurrence that the proposed project would not adversely affect the activities, features, and attributes that qualify the resources for protection under Section 4(f), and that the impacts to the Mike Jacob Sports Park would be *de minimis*, by signing below and returning a copy of this letter.

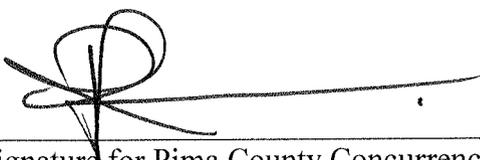
If you have any comments or questions, please do not hesitate to contact James J. Lemmon of the ADOT Environmental Planning Group at (602) 712-6843 or at jlemmon@azdot.gov.

Sincerely,



AUG 1 - 2011

Karla S. Petty
Division Administrator



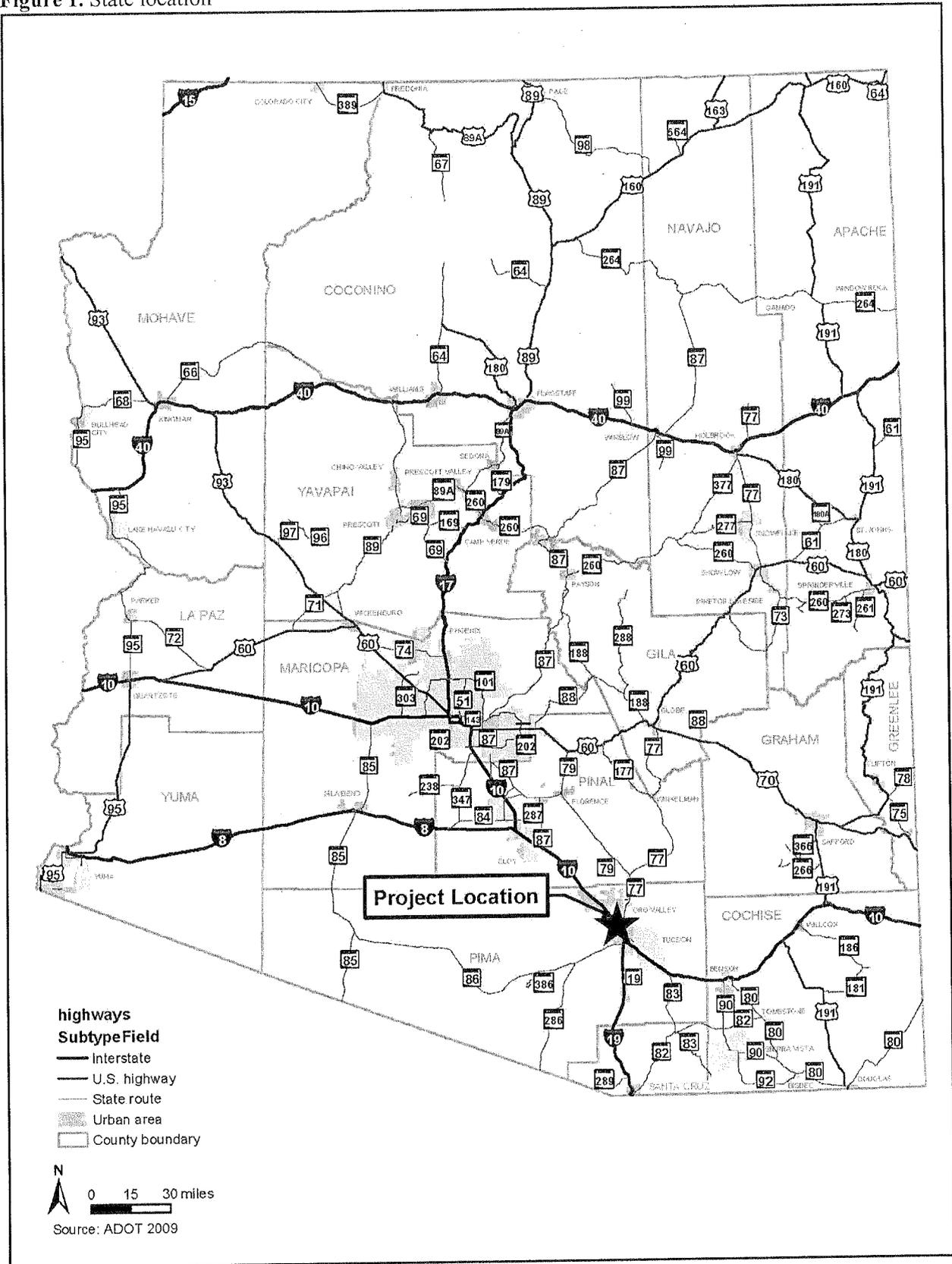
Signature for Pima County Concurrence
010-D(211)N

07.28.11

Date

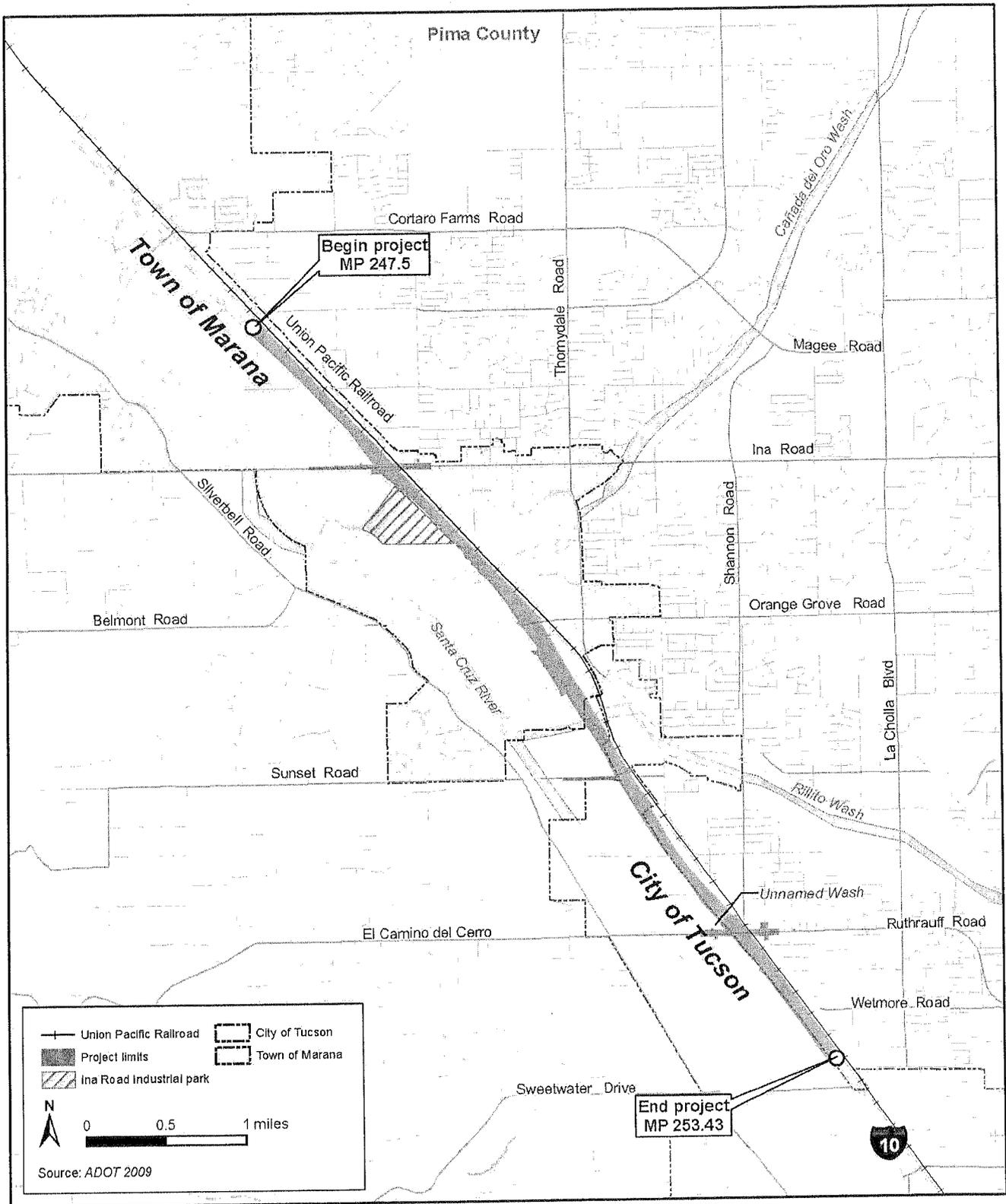
Enclosures

Figure 1. State location



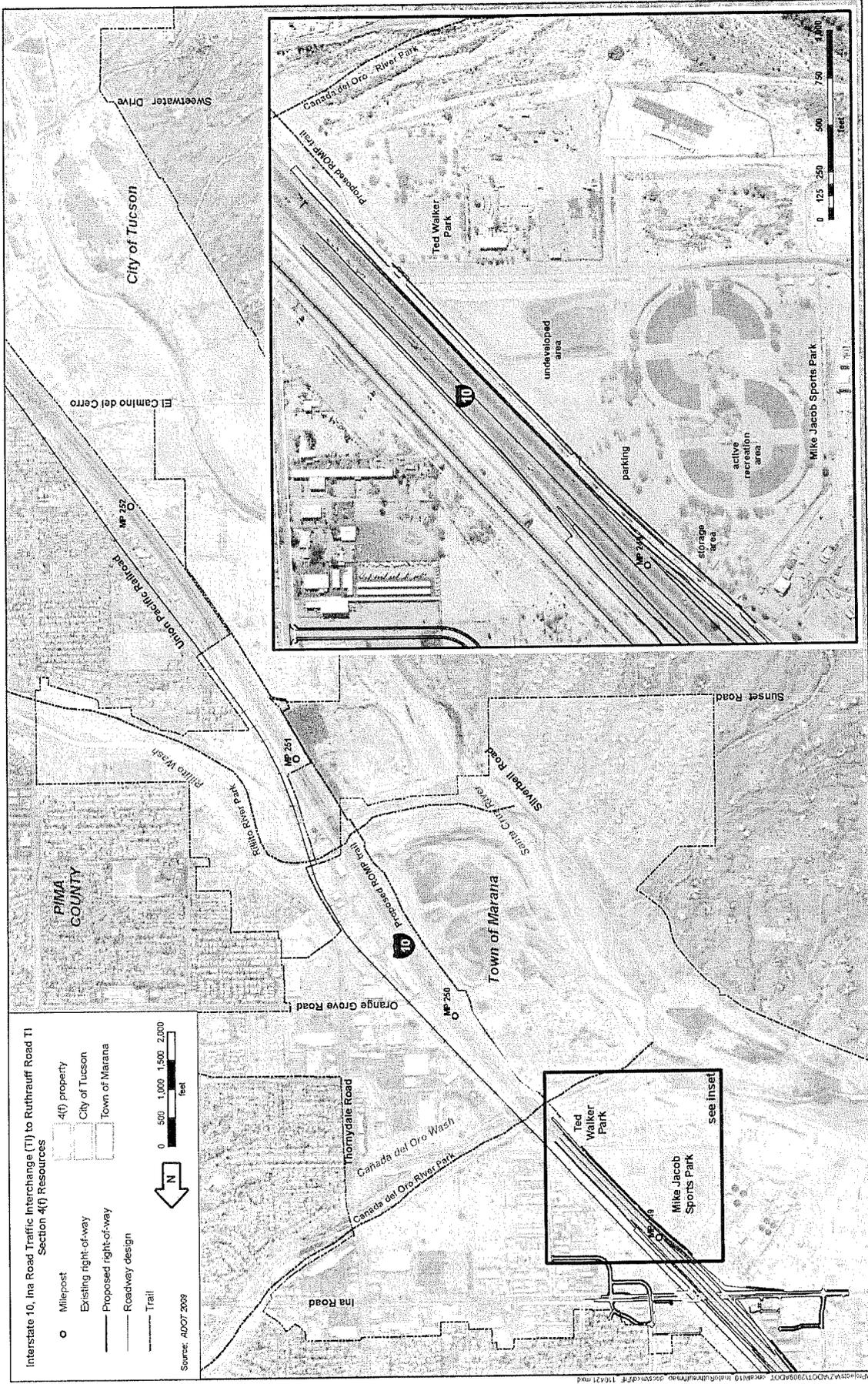
Interstate 10: Ina Road Traffic Interchange (TI) to Ruthrauff Road TI
 010-D(211)N
 010 PM 247 H7583 01L

Figure 2. Project vicinity



Interstate 10: Ina Road Traffic Interchange (TI) to Ruthrauff Road TI
 010-D(211)N
 010 PM 247 H7583 01L

Figure 3. Section 4(f) resources



Interstate 10: Ina Road Traffic Interchange (TI) to Ruthrauff Road TI
 010-D(211)N
 010 PM 247 H7583 01L

Jacobs-Donoghue, Christine

From: James J. Lemmon [JLemmon@azdot.gov]
Sent: Monday, August 15, 2011 12:08 PM
To: Jacobs-Donoghue, Christine
Subject: FW: ADOT/FHWA/RTA proposed I-10 widening project (010-D(211)N HOP-AZ)
Attachments: ADOT_FHWA_RTA proposed I-10 widening project (010-D(211)N HOP-AZ).pdf

Categories: Moderate Priority - tomorrow

More progressI had asked her in a voice mail to respond to the actual letter we sent her and attach it. Jim

From: Curtis.Jamelya@epamail.epa.gov [<mailto:Curtis.Jamelya@epamail.epa.gov>]
Sent: Monday, August 15, 2011 11:14 AM
To: James J. Lemmon
Cc: 'meesa.otani@dot.gov'
Subject: Fw: ADOT/FHWA/RTA proposed I-10 widening project (010-D(211)N HOP-AZ)

Jamelya Curtis
Ground Water Office
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street (WTR-9)
San Francisco, CA 94105-3901

phone: 415.972.3529

fax: 415.947.3549

email: curtis.jamelya@epa.gov

----- Forwarded by Jamelya Curtis/R9/USEPA/US on 08/15/2011 11:12 AM -----

From: Jamelya Curtis/R9/USEPA/US
To: jlemmon@azdot.gov
Date: 08/12/2011 04:18 PM
Subject: ADOT/FHWA/RTA proposed I-10 widening project (010-D(211)N HOP-AZ)

Dear Mr. Lemmon:

Thank you for notifying EPA of Arizona Department of Transportation's (ADOT), in conjunction with the Federal Highway Administration (FHWA) and the regional Transportation Authority (RTA) proposed project to widen Interstate 10 (I-10) within Pima County, Arizona, within the map limits of the Upper Santa Cruz and Avra Basin sole source aquifer. July 2011 letter, it does not appear that the proposed project will adversely affect the Upper Santa Cruz & Avra Basin aquifer. If you have any questions, please feel free to contact me.

Jamelya Curtis
Ground Water Office
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street (WTR-9)
San Francisco, CA 94105-3901

phone: 415.972.3529

fax: 415.947.3549

email: curtis.jamelya@epa.gov

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U.S. Department
of Transportation
**Federal Highway
Administration**

ARIZONA DIVISION

4000 North Central Avenue
Suite 1500
Phoenix, Arizona 85012-3500
(602) 379-3646
Fax: (602) 382-8998
<http://www.fhwa.dot.gov/azdiv/index.htm>

July 6, 2011

In Reply Refer To:
010-D(211)N
HOP-AZ

010-D(211)N
TRACS No. 010 PM 247 H7583 01L
I-10, Ina Road TI to Ruthrauff Road TI
Sole Source Aquifer Coordination

Ms. Jamelya Curtis
U.S. Environmental Protection Agency – Region IX
75 Hawthorne Street (WTR-9)
San Francisco, California 94105-3901

Dear Ms. Curtis:

The Arizona Department of Transportation (ADOT), in conjunction with the Federal Highway Administration (FHWA) and the Regional Transportation Authority (RTA), is developing design concepts and conducting environmental analyses that may lead to the widening of Interstate 10 (I-10) within Pima County, Arizona, from Ina Road to Ruthrauff Road. The proposed project would be constructed using FHWA funds and local RTA funds.

The proposed project is approximately 6 miles long, extending from milepost (MP) 247.50 to MP 253.43 (see Figures 1 and 2, attached). The purpose of this project is to increase capacity and enhance safety on I-10 between the Ina Road traffic interchange (TI) and the Ruthrauff Road TI. Proposed improvements include:

- reconstructing I-10 from Ina Road to Ruthrauff Road to widen the roadway from three lanes in each direction to five lanes in each direction
- reconstructing the TIs at Ina Road, Sunset Road, and Ruthrauff Road to elevate the crossroads over I-10 and the Union Pacific Railroad
- adding turn lanes at the frontage road and crossroad intersections along the corridor
- replacing the bridges over the Cañada del Oro (CDO) Wash and Rillito River to widen the roadway and increase the 100-year storm freeboard

Portions of the proposed project are within the floodplain (FEMA Floodplain Maps 04019C1605K, 04019C1610K, and 04019C1617K), including the CDO Wash and Rillito River.

The project would need new right-of-way and may modify access to adjacent properties. The project is in the planning and evaluation stage. The design concept report and environmental assessment (EA) phase of the project is expected to be completed in the winter of 2011. An implementation plan for the project is also being developed and will outline project priorities, phasing, construction dates, and likely funding sources. The proposed project is likely to be constructed in phases over many years.

The proposed project is located within an area supplied with water by the Upper Santa Cruz and Avra Basin Sole Source Aquifer and is being evaluated through an EA; therefore, we are seeking concurrence that the proposed project complies with Section 1424(e) of the Safe Drinking Water Act of 1974 and that the project has been designed in such a manner as to not create a significant hazard to public health, interfere with public welfare, or cause any public water system to install additional treatment facilities to meet the National Primary Drinking Water Regulations.

The project area is at the northern end of the Tucson basin, a structural depression within the Basin and Range physiographic province. The Tucson basin is a broad, 1,000-square-mile area in the upper Santa Cruz River drainage basin. The basin is filled with sediments. Surface soils were deposited by the Santa Cruz River and its tributaries—including the CDO Wash, the Rillito River, and their related drainages—and include overbank deposits of silt, clay, and fine sand, and channel deposits consisting of sand, gravel, and cobbles transported from the surrounding mountains and alluvial terraces. These general units are randomly layered within the soil profile as a result of thousands of years of river and stream channel meandering. Below these units lie older alluvial terrace deposits consisting of sand and gravel with varying amounts of clay.

Depths to groundwater in the project area vary depending on land surface elevations. Based on well data from the U.S. Geological Survey and the Arizona Department of Water Resources, the depth to groundwater varies from approximately 85 feet below ground surface (bgs) to 170 feet bgs. However, geotechnical test borings completed for the proposed project showed that perched groundwater is located near the Ruthrauff Road TI at a depth of 58 feet bgs (approximately 2,189 feet above mean sea level). Since bridge pier borings at the CDO Wash and Rillito River would extend approximately 80 feet bgs, and borings at TIs would extend approximately 100 bgs, groundwater may be encountered during pier boring.

The El Camino del Cerro Water Quality Assurance Revolving Fund site includes an impacted groundwater plume that lies beneath part of the project. Construction activities such as advancement of borings, pier construction, and deep excavation may have the potential to interact with groundwater contamination. Therefore, construction activities in this area would be guided by a Contaminated Media Management Plan (CMMP) which would provide for contaminant control and address environmental construction monitoring, worker exposure, cross-contamination, and impacted media disposal.

Bridge pier construction is likely to involve a slurry fill process that stabilizes the shaft during concrete installation. The slurry contains a polymer and water and is placed into the shaft to hold the shape of the boring. Concrete is then poured beneath the slurry cap, which displaces the slurry upward where it is recovered by being pumped out and cycled through vats. The slurry may be reused at the next shaft, and at the end of the process, bleach is added to neutralize the polymer and the chlorinated water is typically disposed of through storm drain systems. The disposal process requires an Arizona Pollutant Discharge Elimination System permit. Note that slurry from borings in locations and depths that would intercept contamination would not be reused.

Portions of the CDO Wash and Rillito River within ADOT right-of-way have existing soil cement along the banks and across the wash channel to provide scour protection for ADOT structures, and are underlain by sand. Elsewhere, the channel bottom is earthen, with the top layer being loose sand and extending 15 to 30 feet bgs. Bridge pier construction would take place in this material, and any disturbed soil cement would be replaced. Additional erosion protection such as extension of the soil cement toe down may be warranted and would be further evaluated in conjunction with design.

Best management practices (BMPs) would be used during bridge construction to protect groundwater resources. These BMPs include:

- Lubricants, fuels, and oils would be stored and dispensed away from the washes.
- Any disturbance to the washes would be minimized and, once the piers are in place, the remainder of the work would occur outside the washes.
- Gravel and riprap would be obtained from approved sources and be contaminant-free.
- Catchment silt fencing, fiber rolls, or concrete barriers would be used to prevent debris, waste, and toxic compounds from entering the washes.
- Construction equipment would be inspected daily for leaks or fluid discharges.
- All maintenance yards would be located outside the washes.
- All construction equipment maintenance and storage would occur outside of the washes.
- No cement dumping or equipment cleaning would occur in or near the washes.
- Soils that are removed from the earthen bottom portions of washes would be labeled and stockpiled outside the channel until construction activities are completed. Then the soils removed from the wash would be placed back into the areas from where they were removed.
- Any upland soils that are removed would be moved farther upland to prevent erosion into the washes.
- All runoff from the completed bridges would be captured in gutters and routed to a catch basin for settling prior to discharge to the Santa Cruz River.
- Whether or not groundwater is encountered, the contractor would use slurry fill to construct the shafts.
- Any discharges would be handled in accordance with state and federal regulations.
- The proposed project would disturb one or more acre of topsoil; therefore, it would be subject to AZPDES stormwater permitting for the construction site runoff.

To meet our anticipated completion date for this project's environmental documentation, we would appreciate your response within 30 days after the date of this letter. Should you have any questions, please contact James J. Lemmon of ADOT's Environmental Planning Group, at (602) 712-6843.

Sincerely,



Karla S. Petty
Division Administrator

for

Enclosures:
location and vicinity maps

cc:

Figure 1. State location

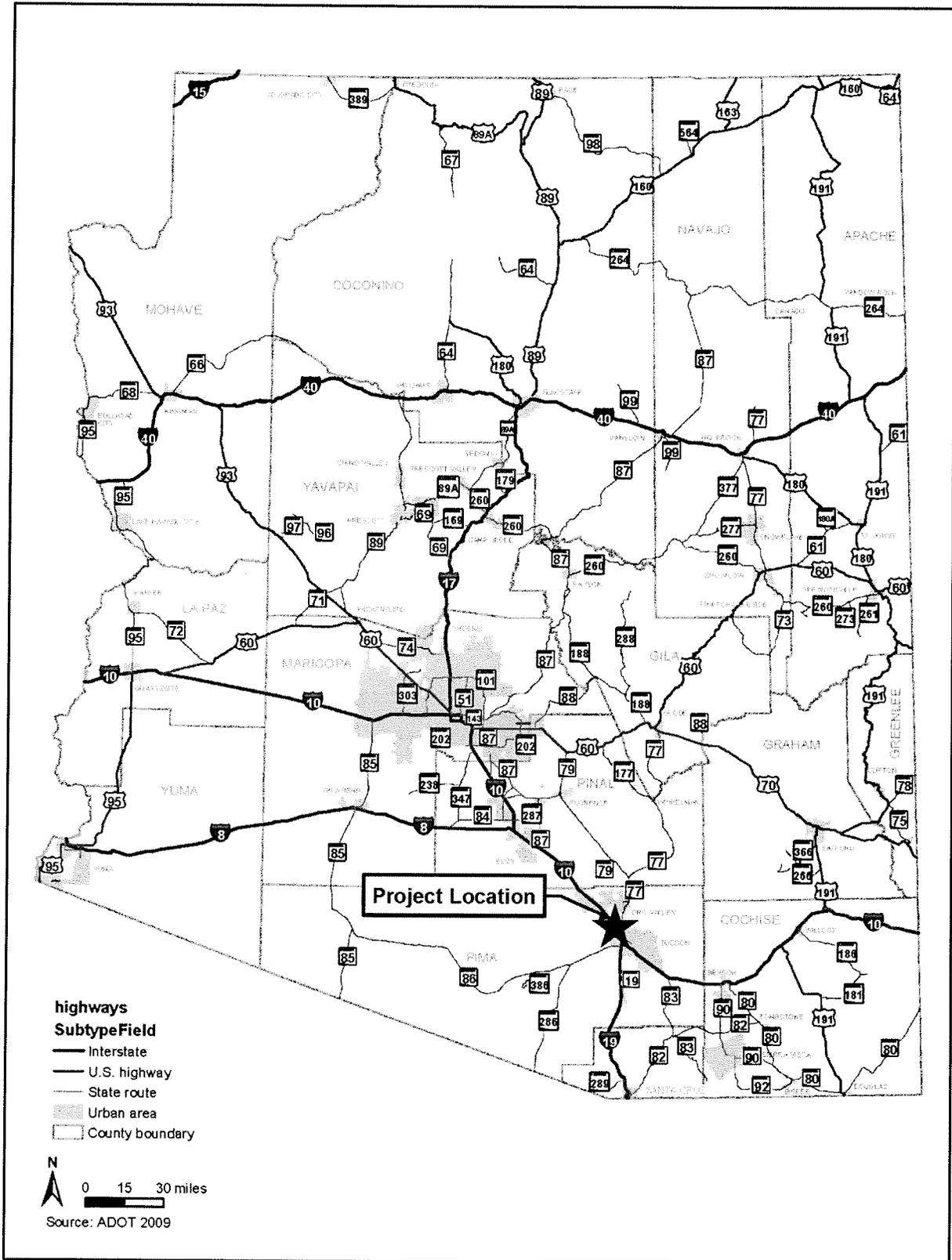
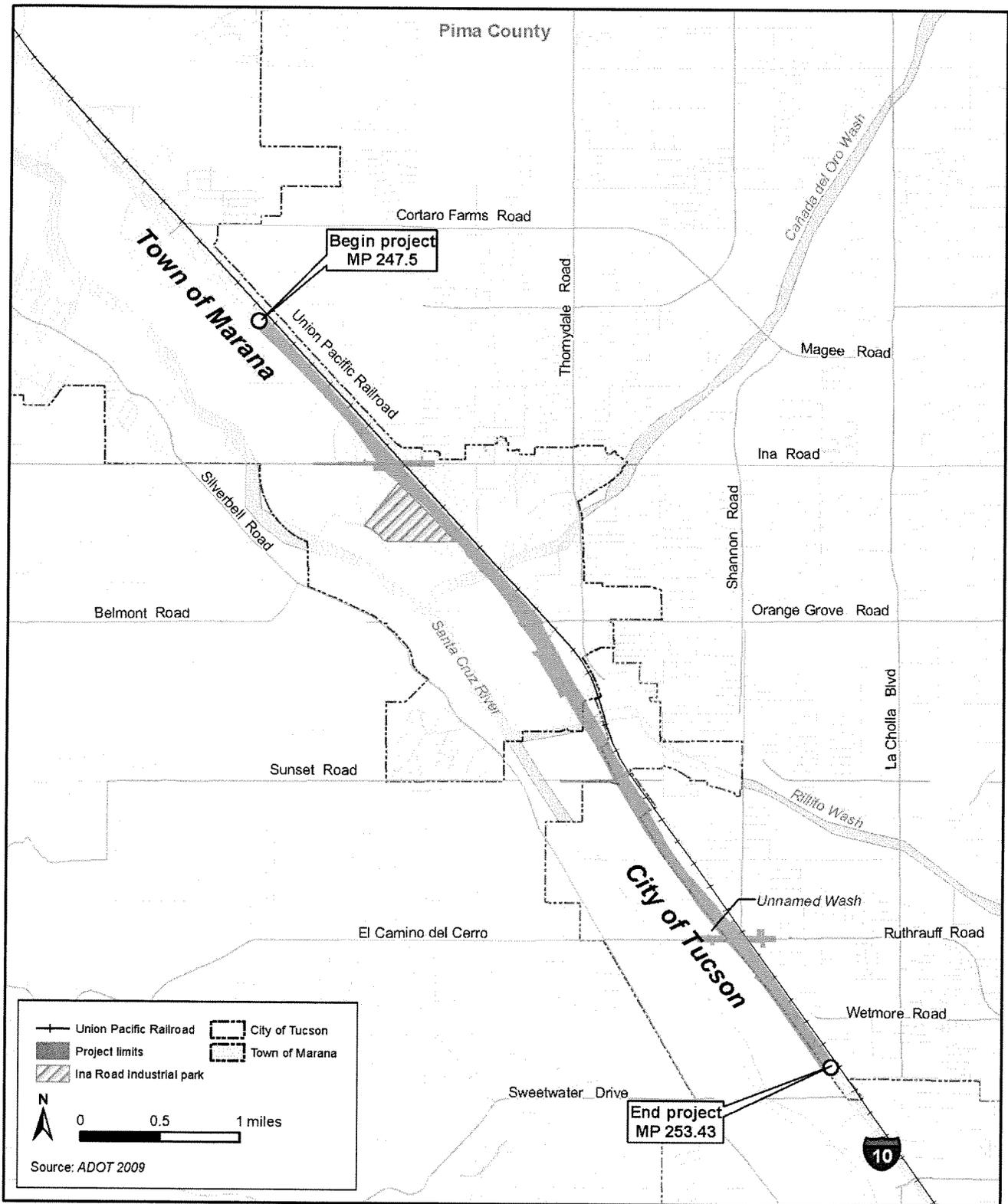


Figure 2. Project vicinity



Tucson Electric Power Company

4350 E. Irvington Road, Tucson, AZ 85714

Post Office Box 711, Tucson, AZ 85702

Telephone: 520-918-8314

Fax: 520-545-1443

September 23, 2011

Arizona Department of Transportation
Regional Transit Authority
C/O Marie Miyashiro, APR
Gordley Design Group
2540 N. Tucson Blvd.
Tucson, AZ 85716-2470

Re: ADOT/RTA Interstate 10 (I-10) from Ina Road Proposed Traffic Interchange (TI) Tucson Electric Power (TEP) Public Scoping Comments

Dear Ms. Miyashiro:

TEP appreciates this opportunity to provide written comment regarding the Ina Road to Ruthrauff Road TI project, as a follow-up to the recent public and business scoping meetings we attended. This letter is being provided specifically in response to a preliminary alternative that was presented as the "Preferred Alternative," which will have significant impacts to three properties owned by TEP (Parcels 101-05-008F, 101-05-008K and 101-05-0110), collectively known as the West Ina substation site. TEP staff attended two public meetings, as well as a subsequent meeting with the project team to gain a better understanding of the alternatives evaluated for the project. After careful review and evaluation of company land holdings, Town of Marana zoning requirements, and tangible assets associated with the substation, current and potential future use of the substation, TEP regrets that we are unable to support the Preferred Alternative as presented.

The West Ina substation serves electricity to approximately 30,000 customers in both the Town of Marana and Pima County, and is an integral part of TEP's mission in providing safe and reliable power in the northwest Tucson metropolitan area. Any impacts to equipment and facilities currently located at the substation property will result in the modification and/or relocation of the substation facilities, at a considerable cost.

The Preferred Alternative will have substantial negative impacts to TEP's substation and its ancillary facilities, to the extent the site may no longer operate in its current form and function. The substation site lies within the Town of Marana and has both the Village Commercial (VC) and Heavy Industrial (HI) zoning designations. The removal of lands through the middle of the West Ina substation site would leave remnant pieces of property and uses that would no longer be in compliance with Town of Marana Land Development Code development standards (05.11.03 H and I; 05.12.03 G and H).

The Preferred Alignment exhibit provided by ADOT indicates there are two collector roads planned with the potential to impact TEP properties. The first is a proposed collector road located along and within the substation's northern boundary and the second is the collector in the Camino De La Cruz alignment, which would bisect the entirety of the substation site. The current uses of the TEP properties are an electrical substation, construction materials laydown yard, office/storage yard, park

and ride location for TEP staff and contractors, and a transmission line corridor. To provide clarification of how the proposed ADOT TI project will impact TEP's facilities and land use additional information was added to the attached exhibit, originally provided by HDR, Engineering Inc. titled, Ina Road East Preliminary Build Alternative, dated October 4, 2010.

The following is a list of detailed concerns to give ADOT and the Regional Transportation Authority (RTA) an understanding of TEP's decision to not support the Preferred Alternative as proposed:

1. The planned collector along the Camino de la Cruz alignment bisects TEP property and will significantly reduce the current and future functionality of the substation site. The planned northern collector road will be in direct conflict with existing TEP facilities. It will also preclude perimeter access within the substation proper for operation, maintenance and future improvements.
2. TEP requires safe and reliable access to all the facilities and existing uses at this location. This includes the ability to turn and park large trucks, cranes and other equipment used currently for day to day operations.
3. This facility is used as a park and ride location by TEP employees and contractors. There are currently 31 marked parking spaces in the area where the proposed collector street bisects TEP's property. These parking spaces would no longer be available to park TEP vehicles and equipment, creating a need to find space elsewhere.
4. The office facility located to the east of the proposed collector road would be split from the rest of the facility and will be functionally obsolete because it would not have a sufficient number of parking spaces to support current operations at the facility, nor would it be attractive for potential future users because of the small size of the property and inadequate parking area.
5. Throughout discussions with HDR and ADOT's project engineer, TEP has been given verbal confirmation that none of the proposed TI improvement or collector streets would impact or cause the relocation of TEP facilities within the substation or in areas adjacent to the current right-of-way of Ina Road. Of primary concern to TEP are potential impacts to the substation facilities south of the Chuy's restaurant and underground getaway facilities south of Ina Road in the Chuy's parking area. Impacts to any of these facilities would be costly (upwards of six million dollars) and may cause the relocation of the substation proper. These costs would be in addition to the cost of the property acquired by ADOT/RTA and any severance damages to the remaining parcel(s).
6. The collector road as planned along the Camino De La Cruz alignment does not appear to be a requirement for general traffic circulation in the area. Instead, it appears to be designed to serve existing businesses along its alignment as well as provide circulation relief for the planned Regency Plaza along Camino Martin. Therefore, construction of the collector road along this alignment presents a disproportionate burden on TEP parcels as compared to the benefit to those businesses.
7. TEP uses the southern end of the property as a lay down yard for materials such as wire, power poles, switch equipment and vehicles which support daily utility operations. It will be important to retain a safe turning radius on the property for large trucks, as well as a separate, gated entrance with secured access.
8. Approximately eighteen trees in a water catch basin on the north side of the parking area would be removed under the Preferred Alternative. These trees provide screening for the

substation and were a requirement of the Pima County landscape requirements when the substation was built. Now mature, they contribute to the scenic value of the property. TEP is concerned that, if altered, the property would not be in compliance with current Marana landscaping requirements (05.11.03H8 and 05.12.03H10) which require that 10 percent of the area not occupied by buildings or structures to be landscaped.

9. Construction of the TI and collector roads will provide for greater visibility of and access to the substation facilities within the TEP property. TEP would need to be compensated or provided additional screening measures such as a wall and landscaping to be in compliance with current standards.
10. TEP's mission has always been to provide safe and reliable service to our customers. This requires the company to ensure the security of our facilities. With the construction of the collector road on the Camino de La Cruz alignment, TEP would lose a current security gate being used to access the substation site. Due to the design of the collector roads, TEP anticipates needing three new driveways off of the collector road that will need the same type of secure access.
11. With the proposed design of the collector roads, the office building and storage yard facility would not be in compliance with Town of Marana Development Standards in either the VC or HI zones, specifically, standards 05.12.03G2, 05.12.03H3a, 05.12.03H5, 05.12.03.H6, 05.12.03H9, 05.012.03H10, 05.11.03I5a-c, 05.11.03I6, and 05.11.03I8.

TEP reserves the right to provide further comment at any time for this and any additional alternatives presented. Thank you again for providing the opportunity to comment on this project. Please do not hesitate to contact me with any questions or concerns. I can be reached via email at chall@tep.com or by telephone at (520) 918-8314.

Respectfully,



Cheryl Hall, Sr. Environmental and Land Use Planner
Tucson Electric Power Company
A Unisource Energy Corporation

Cc: Shannon Breslin, TEP
Cory Pintor, TEP

