

Interstate 10 Ina Road Traffic Interchange (TI) to Ruthrauff Road TI Final Environmental Assessment

Pima County, Arizona
Federal Aid No. 010-D(211)N
ADOT Project No. 010 PM 247 H7583 01L



November 2012
Version 4.0



FEDERAL HIGHWAY ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT

FOR

Interstate 10
Ina Road Traffic Interchange (TI) to Ruthrauff Road TI

010-D(211)N

010 PM 247 H7583 01L

The Federal Highway Administration has determined that this project will not have any significant impact on the human or natural environment. This finding of no significant impact is based upon the attached environmental assessment, which has been independently evaluated by the Federal Highway Administration and determined to adequately discuss the environmental issues and impacts of the proposed project. The environmental assessment provides sufficient evidence and analysis for the Federal Highway Administration to determine that an environmental impact statement is not required. The Federal Highway Administration takes full responsibility for the accuracy, scope, and content of the attached environmental assessment.

Edward S. Stilling

11-15-12

FOR Karla S. Petty
Division Administrator

Date

Final Environmental Assessment

for

**Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI
Pima County, Arizona**

Federal Aid No. 010-D(211)N
ADOT Project No. 010 PM 247 H7583 01L

November 2012

Approved by: Paul O'Brien Date: 11/14/12

Paul O'Brien, Manager
Environmental Planning Group
Arizona Department of Transportation

Approved by: Edward S. Stillings Date: 11-15-12

FOR Karla S. Petty, Division Administrator
Federal Highway Administration
U.S. Department of Transportation

This environmental assessment has been prepared in accordance with provisions and requirements of Title 23 Code of Federal Regulations Parts 771 and 774, relating to the implementation of the National Environmental Policy Act of 1969 (42 U. S. Code 4332(2)(c)).

Contents

Abbreviations and Acronyms.....	iv
I. Introduction	1
Project Description.....	1
Summary of the Environmental Assessment Process.....	1
Overview of the Final Environmental Assessment	2
II. Mitigation Measures	4
Arizona Department of Transportation Design Responsibilities.....	4
Arizona Department of Transportation District Responsibilities.....	6
Arizona Department of Transportation Roadside Development Section Responsibilities.....	6
Contractor Responsibilities	6
Standard Specifications Included as Mitigation Measures	11
III. Changes to the Draft Environmental Assessment	13
Part III. Alternatives.....	13
Part IV. Affected Environment, Environmental Consequences, and Mitigation Measures.....	15
Part VI. Conclusion	23

Appendixes

Appendix A.....	Public and Agency Comments on Draft Environmental Assessment and ADOT’s Responses
Appendix B.....	Notice of Hearing and Availability of Draft Environmental Assessment
Appendix C.....	Public Hearing Report including Transcript
Appendix D.....	Cultural Resources Consultation

Abbreviations and Acronyms

ADOT	Arizona Department of Transportation
APE	Area of Potential Effect
ASLD	Arizona State Land Department
ASM	Arizona State Museum
CMMP	Contaminated Media Management Plan
CPC	California Portland Cement
dBA	A-weighted decibel
EA	environmental assessment
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
I-10	Interstate 10
MP	milepost
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NRHP	National Register of Historic Places
PM _{2.5}	fine particulate matter (less than or equal to 2.5 microns)
PM ₁₀	particulate matter (less than or equal to 10 microns)
RTP	<i>Regional Transportation Plan</i>
ROW	right-of-way
SHPO	State Historic Preservation Office
TI	traffic interchange
TIP	Transportation Improvement Program
Uniform Act	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

I. Introduction

Project Description

The Arizona Department of Transportation (ADOT), in conjunction with the Federal Highway Administration (FHWA), has identified the need to improve Interstate 10 (I-10) from Ina Road to Ruthrauff Road. The I-10 Ina Road Traffic Interchange (TI) to Ruthrauff Road TI improvement project limits extend from milepost (MP) 247.5 to MP 253.43 on I-10, including the I-10 frontage roads and the TIs at Ina, Orange Grove, Sunset, and Ruthrauff Roads. The project area is located in the Tucson metropolitan area of Pima County, Arizona, and is within the jurisdictions of the Town of Marana, City of Tucson, and Pima County.

The Selected Alternative will implement components of state and local transportation plans, increase roadway capacity, and improve operational efficiency of this portion of I-10 by providing five travel lanes in each direction, with auxiliary lanes between on-ramps and off-ramps, and by reconstructing existing TIs. TIs will be improved by constructing crossroads over I-10 and the railroad at Ina, Sunset, and Ruthrauff Roads, thereby eliminating potential motor vehicle conflicts with the railroad. The I-10 main line profile will be raised at Cañada del Oro Wash and Rillito Creek to provide sufficient floodway clearance. The Selected Alternative will be achieved through a phased design and construction program (series of smaller projects), depending on funding availability and prioritization of projects.

Summary of the Environmental Assessment Process

This environmental assessment (EA) has been prepared in accordance with provisions of the National Environmental Policy Act of 1969 (NEPA), FHWA regulations implementing NEPA (Title 23 Code of Federal Regulations Part 771), provisions of Section 4(f) of the Department of Transportation Act of 1966 (Title 23 Code of Federal Regulations Part 774), and environmental requirements of ADOT. The NEPA process provides steps and procedures to evaluate the potential social, economic, and environmental impacts of proposed improvements on I-10 and provides an opportunity for the public and local, state, and federal agencies and tribes to provide input and/or comments through the scoping and public involvement process. FHWA is the lead federal agency regarding approval of this document.

The Draft EA was completed and approved by FHWA on May 23, 2012. A public hearing was held at the Ellie Towne Community Center in Tucson on June 21, 2012. Notice of the hearing and availability of the Draft EA for public review was published in the *Arizona Daily Star* on June 4, 2012, and in the *Explorer* on June 6, 2012. A postcard notification was mailed to public, agency, and stakeholder contacts on the project mailing distribution list on June 1, 2012.

The general public, government agencies, and other interested parties had an opportunity to provide comments between June 6 and July 6, 2012. Comments could be submitted in writing by mail or e-mail, or at the public hearing where oral comments were recorded by a court reporter and written comments were collected on comment sheets. These comments were collected and assembled into a report by ADOT Communication Division.

On July 17, 2012, a letter was sent to affected businesses and property owners informing them of changes to the Sunset Road interim condition that occurred after the Draft EA was published; see Appendix A for a copy of the letter. These changes were made to allow ADOT flexibility in reconstructing I-10 in this vicinity, but would necessitate closure of the Sunset Road TI and crossroad until Pima County constructs its proposed Sunset Road improvements (also see Section III and Figure 9 herein). The letter described changes and

indicated that team members would be available to meet with them if requested; comments were requested by August 17, 2012. No meeting was held; however, 4 comments were received and addressed in Appendix A (see Table *Public and Agency Comments on the Draft Environmental Assessment and ADOT's Responses*, comment nos. 27, 28, 29, and 32; comment forms are in Appendix C, Part 4).

This Final EA responds to comments received during the comment period and provides additions or corrections to the Draft EA where necessary. This Final EA, which should be used in conjunction with the Draft EA, includes:

- the final list of mitigation measures to be included in the final design specifications and the *Plans, Specifications, and Estimate Package* for the I-10 construction work (Part II)
- additions and corrections to the Draft EA (Part III)
- public and agency comments received during the comment period and ADOT's response to those comments (Appendix A)
- notice of public hearing and availability of the Draft EA (Appendix B)
- the public hearing report (Appendix C), which includes the following items:
 - the meeting summary
 - meeting notification (Part 1)
 - hearing materials and presentation (Part 2)
 - the hearing transcript (Part 3)
 - public hearing question cards, comment forms, letters and faxes (Part 4)
- correspondence on cultural resources consultation (Appendix D)

With completion of this Final EA and with issuance of the *Finding of No Significant Impact* by FHWA, NEPA requirements for this project have been met.

Overview of the Final Environmental Assessment

This Final EA is presented in an addendum format and should be considered in conjunction with the Draft EA. The following global changes apply to all text found in the Draft EA:

- All references to the “Build Alternative” or “Preferred Alternative” are changed to “Selected Alternative.”
- Use of the word “proposed” with regard to the project/action is eliminated.
- All uses of “would” with respect to the overall project or the Selected Alternative are changed to “will,” including uses pertaining to ADOT Design, District, and Roadside Development responsibilities; descriptions of alternatives and associated design features; and descriptions of the affected environment and environmental consequences.
- All uses of “would” in connection with the contractor's responsibilities are changed to “shall.”
- All mitigation measures in the Draft EA are replaced by those provided in this Final EA (Part II).

These changes made throughout the Draft EA text are not reproduced in this Final EA, with the exception of those contained within the mitigation measures or those that fall within a paragraph that has undergone additional changes.

Part III includes additions or alterations to clarify, further discuss, or correct the Draft EA. Prior to each text change, the original Draft EA chapter titles are provided to help orient the reader, as well as the page number, paragraph number, and/or other location identifier. Revisions to the Draft EA text are shown in this document with strikethrough text (~~strikethrough~~) for text that has been removed or with blue italicized text (*italics*)¹ for text that has been added. Document names are also italicized in the Draft EA and can be distinguished by shading.

¹ This text appears gray in black-and-white prints or copies.

II. Mitigation Measures

Page references shown in this section refer to pages in the Draft EA.

Arizona Department of Transportation Design Responsibilities

1. Acquisition will be conducted through an assistance program in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 Code of Federal Regulations § 24), which identifies the process, procedures, and time frame for right-of-way acquisition and relocation of affected residents or businesses (see pages 33 and 41).
2. To ensure sufficient access to properties during construction, key local access improvements at Ina Road and Ruthrauff Road will be completed prior to reconstruction of the respective traffic interchanges (see page 41).
3. Landscape plans will include areas of available right-of-way along North Camino de la Cruz and Maryvale Avenue to provide a buffer between residential and commercial land uses (see page 42).
4. A transportation management plan will be prepared consistent with the Federal Highway Administration's *Manual on Uniform Traffic Control Devices for Streets and Highways*, dated 2010. In addition, the transportation management plan will have the following requirements (see page 42):
 - During development of the final design, the Arizona Department of Transportation will coordinate with emergency response and transit providers (Arizona Department of Public Safety, City of Tucson Police Department, Town of Marana Police Department, Pima County Sheriff's Department, Northwest Fire District, Rural/Metro Fire Department, Northwest Medical Center, SunTran, and the Amphitheater, Marana Unified, Flowing Wells, and Tucson Unified school districts) to accommodate emergency and transit needs in the transportation management plan.
 - The plan will account for peak traffic associated with seasonal events (golf tournaments, gem and mineral show, cycling events, etc.).
 - The plan will ensure access to all properties will be provided and maintained during construction.
 - Signs will indicate business access to commercial properties within the construction zone.
5. During final design, testing and data recovery plans will be developed and implemented by the Arizona Department of Transportation Environmental Planning Group Historic Preservation Team, in consultation with the State Historic Preservation Office and other consulting parties. The testing and data recovery plan will be developed in accordance with the existing Programmatic Agreement executed for the project. Construction activities will not occur in areas requiring testing and data recovery until the terms and conditions of the Programmatic Agreement have been fulfilled (see page 52).
6. During final design, the Arizona Department of Transportation will coordinate with Pima County to replace lost parking on-site at Mike Jacobs Sports Park, reconstruct the driveway entrance to the parking lot, and replace the affected landscaping (see page 57).
7. During final design, the Arizona Department of Transportation project manager will arrange for qualified personnel to review and update the noise analysis (see page 67).

8. During final design, the Arizona Department of Transportation will coordinate relocation of utilities with the affected utility companies. If service disruption will be needed for relocation, the Arizona Department of Transportation will coordinate with the utility companies to ensure customers are notified prior to service disruption (see page 69).
9. The Arizona Department of Transportation will provide Union Pacific Railroad with an opportunity to review and comment on the design plans (see page 69).
10. The Arizona Department of Transportation will incorporate architectural and landscape treatments into the final design of structures, including retaining walls. Treatment designs will be evaluated and developed with consideration of community input (see page 72).
11. The Arizona Department of Transportation will prepare and submit an application to the U.S. Army Corps of Engineers for a Clean Water Act Section 404 permit for the project. No work will occur within waters of the United States until the appropriate Clean Water Act Section 401 certification and Section 404 permit are obtained (see page 78).
12. The Arizona Department of Transportation will design drainage so that all runoff from the completed bridges will be captured and routed to a catch basin for settling prior to discharge, consistent with the Arizona Department of Transportation's *Erosion and Pollution Control Manual for Highway Design and Construction*, dated 2005, and *Post-Construction Best Management Practices Manual for Highway Design and Construction*, dated 2009 (see page 78).
13. The Arizona Department of Transportation will provide the Pima County (520-243-1800), Town of Marana (520-382-2600), and City of Tucson (520-837-6692) Floodplain Managers with an opportunity to review and comment on the design plans (see page 83).
14. All disturbed soils that will not be landscaped or otherwise permanently stabilized by construction will be seeded using species native to the project vicinity (see page 85).
15. Site-specific environmental site assessments will be conducted prior to property acquisition for the properties as recommended in the 2009 Phase I Initial Site Assessment (see page 91).
16. Preliminary site investigations will be conducted for locations where construction activities will occur within 100 feet of relevant facilities and where such activities will involve ground disturbance at depths of 18 inches or greater. The preliminary site investigation will include a drilling and sampling program to verify or refute the existence of actionable concentrations of released hazardous materials. The analytical program will be targeted to determine the concentration of residual impacts for facilities recommended in the 2011 Phase I Initial Site Assessment (see page 91).
17. During final design, the Arizona Department of Transportation Project Manager will coordinate with the Arizona Department of Transportation Environmental Planning Group Hazardous Materials Coordinator (602-712-7767 or 602-920-3382) to complete testing for asbestos and lead-based paint within the project limits and, if necessary, recommend remediation measures (see page 91).
18. The Arizona Department of Transportation Project Manager will contact the Arizona Department of Transportation Hazardous Materials Coordinator (602-712-7767 or 602-920-3382) 30 days prior to bid advertisement to determine the need for additional site assessment (see page 91).

Arizona Department of Transportation District Responsibilities

1. To ensure sufficient access to properties during construction, key local access improvements at Ina Road and Ruthrauff Road will be completed prior to reconstruction of the respective traffic interchanges (see page 42).
2. The Engineer will contact the Arizona Department of Transportation Environmental Planning Group Historic Preservation Team (602-712-7767 or 602-712-8636) to schedule the preconstruction or partnering meeting on a mutually agreeable date to ensure a qualified Team representative will be available to attend the meeting (see page 53).
3. Prior to construction, the Engineer will have the contractor review the “Environmental Protection on Arizona Department of Transportation Projects Instructions to Contractors” and review and sign the “Checklist for Environmental Compliance.” The Engineer will also sign the checklist and return it to the U.S. Army Corps of Engineers 7 calendar days prior to construction (see page 78).
4. No work will occur within waters of the United States until the appropriate Clean Water Act Section 401 certification and Section 404 permit are obtained (see page 78).
5. The Arizona Department of Transportation will ensure that a Stormwater Pollution Prevention Plan meeting the requirements of the current Arizona Pollutant Discharge Elimination System General Permit for Discharge from Construction Activities to Waters of the United States issued by the Arizona Department of Environmental Quality is prepared and approved for the project (see page 78).
6. The Engineer will submit the contractors’ Arizona Pollutant Discharge Elimination System Notice of Intent and Notice of Termination to the Environmental Coordinator (see page 78).
7. The District will review and approve the Section 404 permit and Section 401 certification applications prior to submittal (see page 78).
8. The Arizona Department of Transportation will inform contractors of the potential contamination associated with hazardous materials sites (see page 91).
9. The Engineer will review the National Emissions Standards for Hazardous Air Pollutants notification received from the contractor. The contractor shall not start work associated with any structures until 10 working days have passed since submittal of the notification to regulatory agencies (see page 91).

Arizona Department of Transportation Roadside Development Section Responsibilities

1. Protected native plants within the project limits will be affected by this project; therefore, the Arizona Department of Transportation Roadside Development Section will determine if Arizona Department of Agriculture notification is needed. If notification is needed, the Arizona Department of Transportation Roadside Development Section will notify the Arizona Department of Agriculture by a “Notice of Intent to Clear Land” at least 60 days prior to the start of construction (see page 85).

Contractor Responsibilities

1. To ensure sufficient access to properties during construction, key local access improvements at Ina Road and Ruthrauff Road shall be completed prior to reconstruction of the respective traffic interchanges (see page 42).

2. The contractor, after coordination with the Engineer, shall communicate traffic control measures with the public, local officials, and the media prior to and during construction activities. Communication may include, but is not limited to, media alerts, direct mailings to area businesses and property owners, information on freeway variable message signs, and paid newspaper notices (see page 42).
3. The contractor, after coordination with the Engineer, shall provide a construction notice to residents and businesses in the general project area at least 2 weeks prior to construction (see page 42).
4. The contractor, after coordination with the Engineer, shall notify the public and business owners of temporary access changes during construction at least 7 calendar days in advance of the change (see page 42).
5. The contractor shall contact local emergency services (hospital, fire, and police, including Arizona Department of Public Safety, City of Tucson Police Department, Town of Marana Police Department, Pima County Sheriff's Department, Northwest Fire/Rescue District, Rural/Metro Fire Department, and Northwest Medical Center) at least 14 calendar days in advance of crossroad, traffic interchange, or frontage road closures so that they may arrange for alternate travel routes (see page 42).
6. The contractor shall contact municipal transit providers (public transit and school districts, including SunTran and Amphitheater, Marana Unified, Flowing Wells, and Tucson Unified school districts) at least 14 calendar days in advance of crossroad, traffic interchange, or frontage road closures so that they may notify their riders and arrange for alternate travel routes (see page 42).
7. At least 14 calendar days prior to construction, the contractor shall place advance-warning signs at locations designated by the Engineer to notify motorists, pedestrians, and bicyclists of construction-related delays (see page 43).
8. With the exception of temporary, short-term closures of less than 3 hours of driveways, the contractor shall maintain driveway access to all businesses and residences throughout construction. If a given property has multiple driveways, at least one shall remain open at all times (see page 43).
9. Access to adjacent businesses and residences shall be maintained throughout construction (see page 43).
10. The contractor, after coordination with the Engineer, shall notify the public a minimum of 48 hours in advance of any road closures (see page 43).
11. If previously unidentified cultural resources are encountered during the undertaking, the contractor shall stop work immediately at that location and shall take all reasonable steps to secure the preservation of those resources. The contractor shall call the Arizona Department of Transportation Environmental Planning Group Historic Preservation Team at (602-712-7767 or 602-712-8636) immediately to make arrangements for the proper treatment of those resources (see page 53).
12. The contractor shall not work in any area with previously identified historic properties (archaeological sites, old State Route 84, the railroad) or in any non-site-specific areas where archaeological testing is required until authorized by the Arizona Department of Transportation Environmental Planning Group Historic Preservation Team (see page 53).
13. The contractor shall maintain access to Mike Jacob Sports Park during construction (see page 57).
14. The contractor shall maintain trail access during construction. Advance notice shall be posted for trail users if any temporary trail closures are required (see page 57).

15. Any trail features negatively affected during construction shall be returned to preconstruction conditions (see page 57).
16. The contractor shall control, reduce, remove, or prevent air pollution in all its forms, including air contaminants, in the performance of the contractor's work (see page 62).
17. The contractor shall comply with the applicable requirements of Arizona Revised Statutes Section 49-401 et seq. (Air Quality) and with the Arizona Administrative Code, Title 18, Chapter 2 (Air Pollution Control) (see page 62).
18. In conjunction with the utility provider, the contractor shall notify members of the public and business owners of temporary utility service interruptions during construction at least 7 calendar days in advance of the interruption of service (see page 69).
19. The contractor shall establish emergency response procedures in the case of accidental utility disruptions (see page 69).
20. Prior to construction, the contractor shall review the "Environmental Protection on Arizona Department of Transportation Projects Instructions to Contractors" and review and sign the "Checklist for Environmental Compliance." The Engineer will also sign the checklist and return it to the U.S. Army Corps of Engineers 7 calendar days prior to construction (see page 78).
21. No work shall occur within waters of the United States until the appropriate Clean Water Act Section 404 permit and Section 401 certification are obtained (see page 79).
22. The contractor shall comply with all terms and conditions of the Clean Water Act Section 401(a) Water Quality Certification certified by the Arizona Department of Environmental Quality (see page 79).
23. The contractor shall comply with all terms, general conditions, and special conditions of the Clean Water Act Section 404 permit as established by the U.S. Army Corps of Engineers (see page 79).
24. The contractor shall develop a containment plan for debris and construction materials to avoid contamination of the Cañada del Oro Wash and Rillito Creek. The containment plan shall be approved by the Arizona Department of Transportation Engineer prior to construction (see page 79).
25. The contractor shall use the Arizona Department of Transportation's project erosion and sediment control plans, details, and specifications as a guide in developing a project Stormwater Pollution Prevention Plan. Best management practices set forth in the project erosion and sediment control plans, details, and specifications shall be included in the contractor's Stormwater Pollution Prevention Plan (see page 79).
26. The contractor, in association with the District, shall submit the Arizona Pollutant Discharge Elimination System Notice of Intent and the Notice of Termination to the Arizona Department of Environmental Quality only after the District has reviewed and approved the Stormwater Pollution Prevention Plan (see page 79).
27. The project is located within a designated municipal separate storm sewer system. Therefore, the contractor, in association with the District, shall send a copy of the certificate authorizing permit coverage and a copy of the Notice of Termination acknowledgement letter to the Arizona Department of Transportation Office of Environmental Services Water Quality Group, Pima County, City of Tucson, and Town of Marana as appropriate based on the location of project activities (see page 79).

28. Best management practices shall be used during construction to protect water resources. These include (see page 79):
- Lubricants, fuels, and oils shall be stored and dispensed away from the washes.
 - Any disturbance to the washes shall be minimized and, once the piers are in place, the remainder of the work shall occur outside the washes.
 - Gravel and riprap shall be obtained from approved sources.
 - Catchment silt fencing, fiber rolls, or concrete barriers shall be used to prevent debris, waste, and toxic compounds from entering the washes.
 - Construction equipment shall be inspected daily for leaks or fluid discharges.
 - All maintenance yards shall be located outside the washes.
 - All construction equipment maintenance and storage shall occur outside of the washes.
 - No concrete dumping or equipment cleaning shall occur in or near the washes.
 - Soils that are removed from the earthen bottom portions of washes shall be labeled and stockpiled outside the channel until construction activities are completed. Then the soils removed from the wash shall be placed back into the areas from where they were removed.
 - Any upland soils that are removed shall be moved farther upland to prevent erosion into the washes.
 - Any discharges shall be handled in accordance with state and federal regulations.
29. To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be washed at the contractor's storage facility prior to entering the construction site (see page 85).
30. To prevent invasive species seeds from leaving the site, the contractor shall inspect all construction equipment and remove all attached plant/vegetation and soil/mud debris prior to leaving the construction site (see page 85).
31. All disturbed soils that will not be landscaped or otherwise permanently stabilized by construction shall be seeded using species native to the project vicinity (see page 85).
32. The contractor shall employ a qualified biologist to complete a preconstruction survey for burrowing owls 96 hours prior to construction in all suitable habitat that will be disturbed. The biologist shall possess a burrowing owl survey protocol training certificate issued by the Arizona Game and Fish Department. Upon completion of the surveys, the contractor shall contact the Arizona Department of Transportation Environmental Planning Group (602-712-7767 or 602-712-7649) to provide the survey results (see page 87).
33. If any burrowing owls are located during preconstruction surveys or construction, the contractor shall employ a qualified biologist holding a permit from the U.S. Fish and Wildlife Service to relocate burrowing owls from the project area, as appropriate (see page 87).
34. If burrowing owls or active burrows are identified during the preconstruction surveys or during construction, no construction activities shall take place within 100 feet of any active burrow until the owls are relocated (see page 87).

35. The contractor shall not cause injury or death to swallows (including eggs and nestlings) and shall avoid work within 200 feet of nesting swallows from February 1 to August 30 of any calendar year. If work will occur within 200 feet of nesting cliff swallows between February 1 and August 30, the contractor shall adhere to the following (see page 87):
- The contractor shall completely remove all existing swallow nests within 200 feet of work areas after August 30 but prior to February 1 to prevent cliff swallows from reusing those nests.
 - The contractor shall implement exclusionary measures to prevent swallows from building new nests within 200 feet of work areas. Exclusionary measures shall be implemented in all areas where swallows are likely to nest, and may include: (a) continually removing nesting materials during early nest construction when eggs or nestlings are not present, (b) installing exclusionary netting (wire or plastic mesh 0.75 inch or less in diameter), (c) installing deterrent spike strips, and/or (d) applying an appropriate bird exclusion liquid or gel.
 - The contractor shall not disturb any active swallow nests (completed or partially completed nests that contain eggs or nestlings). If any active nest is discovered within 200 feet of construction activities, work shall stop and the Arizona Department of Transportation Biologist shall be contacted (602-712-7767) to evaluate the potential for disturbance of nests.
 - The contractor shall monitor and maintain the effectiveness of exclusionary measures used. Netting shall be maintained such that it remains in place without any loose areas or openings that could trap and/or entangle birds. Spike strips shall be maintained such that they remain in place. Exclusion liquid or gel shall be reapplied as often as necessary to remain effective.
 - The contractor shall remove all exclusionary measures after project completion to the satisfaction of the Engineer.
36. The contractor shall immediately stop all subsurface activities and contact the Engineer in the event that potentially hazardous materials or hydrocarbons are encountered, an odor is identified, or significantly stained soil is visible during construction. The contractor shall follow all applicable regulations regarding discovery and response for hazardous materials encountered during the construction process (see page 91).
37. The contractor shall prepare a Contaminated Media Management Plan for work conducted within 200 feet of the current El Camino del Cerro groundwater plume (based on the latest available Arizona Department of Environmental Quality maps). The plan shall address requirements for worker and environmental exposure, monitoring, sampling, storage, and disposal, as applicable. The plan shall be submitted to the Arizona Department of Transportation Environmental Planning Group Hazardous Materials Coordinator (602-712-7767 or 602-920-3882) for approval (see page 91).
38. Environmental construction monitoring for geotechnical boring within 200 feet of the current El Camino del Cerro groundwater plume (based on the latest available Arizona Department of Environmental Quality maps at time of work) shall be conducted consistent with the approved Contaminated Media Management Plan prepared for project construction (see page 91).

39. The contractor shall complete a National Emissions Standards for Hazardous Air Pollutants notification for work associated with any structures and submit it to the Engineer for review. After Engineer approval, the notification shall be submitted to the Arizona Department of Transportation Hazardous Materials Coordinator (602-712-7767 or 602-920-3882) for a 5 working day review and approval. Upon approval by the Hazardous Materials Coordinator, the contractor shall file the notification with the Arizona Department of Environmental Quality and the Pima County Department of Environmental Quality at least 10 working days prior to demolition/renovation associated with any structures (see page 92).
40. The contractor shall not start work associated with the demolition/renovation of structures until 10 working days have passed since the submittal of the National Emissions Standards for Hazardous Air Pollutants notification to the regulatory agencies (see page 92).

Standard Specifications Included as Mitigation Measures

1. The contractor shall provide for the adequate protection of all vehicular and pedestrian traffic and workers through any portion of the work where construction operations interfere with, obstruct, or create a hazard to the movement of traffic consistent with the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction*, Section 701, Maintenance and Protection of Traffic, dated 2008 (see page 43).
2. Consistent with the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction*, Section 104.08 (2008), the following standard specifications shall apply (see page 67):
 - The contractor shall comply with all local sound control and noise level rules, regulations, and ordinances that apply to any work performed pursuant to the contract.
 - Each internal combustion engine used for any purpose on the work or related to the work shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the work without its muffler being in good working condition.
3. During construction operations, should material be encountered that the contractor believes to be hazardous or contaminated, the contractor shall immediately stop work and remove workers within the contaminated areas, barricade the area, provide traffic controls, and notify the Arizona Department of Transportation Engineer in accordance with the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction*, Section 107.07, Sanitary Health, and Safety Provisions, dated 2008 (see page 93).
4. Materials required for this project from sources outside of the project area shall be examined for environmental effects by the contractor prior to use through a separate environmental analysis in accordance with the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction*, Section 1001, Material Sources, dated 2008. Additionally, excess waste material and construction debris shall be disposed of at sites supplied by the contractor in accordance with those standard specifications (see page 93).

5. Materials shall be disposed of consistent with the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction*, Section 107, Legal Relations and Responsibility to Public, dated 2008. Materials removed during construction operations such as trees, stumps, building materials, irrigation and drainage structures, broken concrete, and other similar materials shall not be dumped on either private or public property unless the contractor has obtained written permission from the owner or public agency with jurisdiction over the land. Written permission shall not be required, however, when materials are disposed of at an operating public dumping ground (see page 93).

III. Changes to the Draft Environmental Assessment

In addition to global document changes described in Part I, this part of the Final EA includes additions or alterations to the Draft EA to clarify, discuss further, or make text corrections. These changes result from public and agency comments or changes to the project, and are provided with reference to their corresponding pages in the Draft EA.

No changes to Parts I, II, V, and VII of the Draft EA have been identified.

Part III. Alternatives

Page 22, Access along Sunset Road, paragraph 3

~~Because the reconstructed frontage roads at Sunset Road would be elevated, a temporary, one-lane, at-grade roadway would be provided between the beginning and ending of the elevated segment of the eastbound frontage road to provide access to the existing Sunset Road. This interim connection would remain in place until the Pima County project is completed (see Figure 9). Should ADOT advance reconstruction of I-10 ahead of Pima County's construction along Sunset Road in the vicinity of the Sunset Road TI, an interim improvement will be implemented and will include (see Figure 9):~~

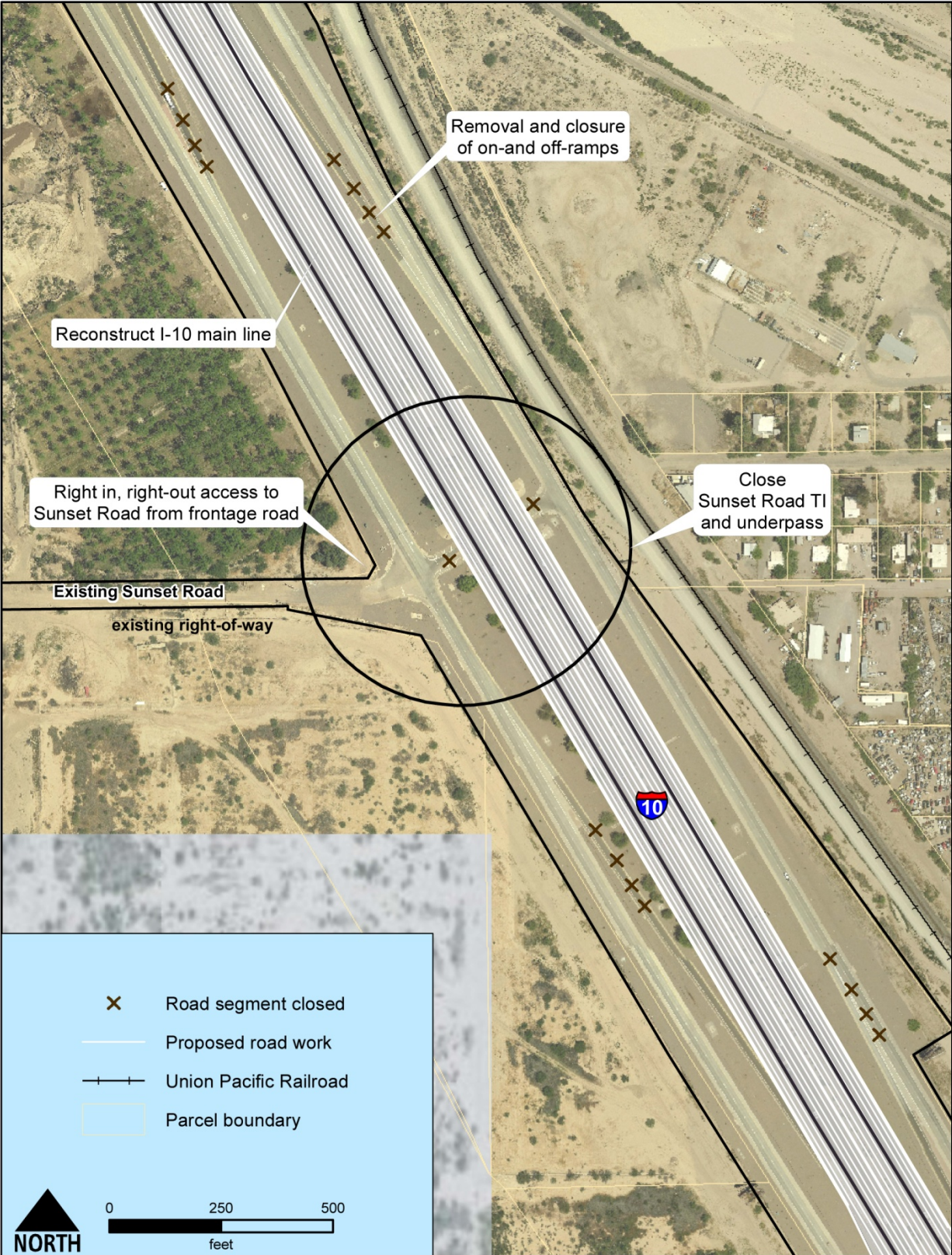
- *closure of the Sunset Road TI crossroad, ramps, and structures*
- *reconstruction of I-10 between the existing frontage roads within the project limits*
- *maintenance of right-in and right-out access to Sunset Road from the eastbound frontage road at the existing location*

Therefore, during the interim condition, there will be no access between the freeway and frontage roads at Sunset Road. ADOT will construct the ultimate improvements (new Sunset Road crossroad, ramps, and elevated frontage roads) in coordination with Pima County's future Sunset Road connection project.

Page 27, Figure 9

[Figure 9 is revised to show the updated Sunset Road interim condition (see next page).]

Figure 9. Sunset Road interim condition



Part IV. Affected Environment, Environmental Consequences, and Mitigation Measures

Page 35, second paragraph

The Build Alternative ~~would~~ *will* require ~~20.4~~ *20.5* acres of new ROW and ~~would~~ *will* permanently displace 2 residences, 13 commercial properties, and 1 City of Tucson property (and potentially displace residents/tenants); partial ROW acquisition of ~~52~~ *43* nonresidential properties ~~would~~ *will* occur (see Tables 8 and 9).

Page 35, Table 8

[Table 8 is revised to reflect updated ownership and parcel information provided by ADOT, and refinements to the extent of proposed ROW acquisition.]

Table 8. Commercial and municipal displacements (full acquisition)

Business name and ownership	Address	Parcel No. ^a	Acreage
<i>Ina Road vicinity</i>			
Starbucks; Tucson Sunrise Properties LLC	4905 W. Ina Road	214-01-007M	1.30 <i>0.82</i>
<i>Valencia Decaf LLC 25%, County Realty LLC 25% (vacant)</i>	<i>4907 W. Ina Road</i>	<i>214-01-007N</i>	<i>0.48</i>
Car Quest Auto Parts, Donut Wheel, Auto Repair Shop; MCC Property Holdings LLC	4522, 4524, 4528 W. Ina Road	225-36-014D	0.50
Vacant building (former Circle K); RI CSI LLC	4500 W. Ina Road	225-36-014C	0.44
Casas Bonitas Development, Good Realty Group, Inc.; Rossco LLC	4460 W. Ina Road	225-37-0250	0.21
Cheryl K. Copperstone, Attorney; Jahanbakhsh and Patricia Khamsehzhadeh	7211 N. Camino de la Cruz	225-37-0260	0.19
Enterprise Rental Car; Robins Inc. Plaza, LLC	4545 W. Ina Road	101-05-010C	0.89
<i>Ruthrauff Road vicinity</i>			
ARCO/AM-PM Market; Khurana Management INC	2790 W. Ruthrauff Road	101-15-041P	1.14
Cruise America; Miller, Walter and Jennifer	2750 W. Ruthrauff Road	101-15-041Q	1.09
Penske Truck Rental; James Harold Matthews	2730 W. Ruthrauff Road	101-15-041M <i>101-15-041J</i>	0.85
Super H Market; Byubios Holdings LLC	2710 W. Ruthrauff Road	101-15-041D	0.34
Vromans Auto Body-Refinishing; Jeffrey W. Vroman	2729 W. Ruthrauff Road	103-07-0120	0.58
Cool Car Wash of Arizona LLC; Guwnig Investment Group LP	2705 W. Ruthrauff Road	103-07-011A	0.58
Vacant; Tucson Water Department	4767 N. Parkway Drive	103-07-018B	0.36
Firebird Fuel; Phoenix Fuel Company INC	4703 N. Parkway Drive	103-07-018A	0.36

^a Pima County Assessor's parcel number from Pima County Map Guide

Page 36, paragraph 3 and bullet list

Table 9 summarizes the impacts that ~~would~~ *will* result from partial property acquisition. Most property impacts ~~would~~ *will* involve the loss of frontage amenities such as fencing, landscaping, or signs. *Fencing is typically removed (e.g., chain link) and replaced at the new ROW line.* ~~Twelve~~ *Fourteen* properties ~~would~~ *will* have direct access to an adjacent roadway eliminated, with insufficient access resulting, and alternative access ~~would~~ *will* be provided. Property owners ~~would~~ *will* be compensated for loss of land and affected amenities consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The use of most of the affected properties could continue in a similar function. However, ~~four~~ *seven* properties ~~would~~ *will* experience greater impacts that may hinder their continued function (shaded properties in Table 9):

- *Enterprise Rental Car – Partial acquisition will involve the removal of all business facilities including the only building, parking, and signs; the remnant parcel will be vacant and access will be from a new connector road.*
- *Phil’s Sheds – Partial acquisition will involve 0.16 acre of the 1.99-acre business (8 percent), including the demolition or relocation of four or more small buildings/structures. The new connector road will divide the property. The largest building on-site will be avoided, and access to remnant property will be from the new connector road.*
- Pima County well site – The new connector road construction may affect active or planned facilities.
- *Dow Chemical well site – Encroachment may affect active or planned facilities.*
- Gilbert Pump – Partial acquisition ~~would~~ *will* involve 0.57 acre of the 2.02-acre property (28 percent), including the demolition of a 4,800-square-foot building, relocation of an office trailer, and potential impacts on a second building on-site.
- Insearch Investments LLC – Partial acquisition ~~would~~ *will* involve demolition of the only building on this commercial site.
- Neff Rental – Partial acquisition ~~would~~ *will* require the demolition of the smaller of two buildings associated with this business.

Pages 36 through 39, Table 9

[Table 9 is revised to reflect updated ownership and parcel information provided by ADOT, and refinements to the extent of proposed ROW acquisition.]

Table 9. Commercial and municipal properties (partial acquisition)

Business and ownership	Address	Parcel No.^a	Impacts
<i>Ina Road vicinity</i>			
Pima County Regional Wastewater Reclamation Department	5025 W. Ina Road	214-01-0100 214-01-007K	Frontage amenities (signs, fencing, and minor landscaping)
Valencia Decaf LLC, County Realty LLC	4907 W. Ina Road	214-01-007	Vacant
Union Pacific Railroad	Ina Road at railroad crossing	214-01-005B 221-38-002B	Full width ROW ^b north and south of Ina Road to accommodate new structures across railroad
Ina Freedom Self Storage, LLC	4676 W. Ina Road	221-38-001G	Eliminate direct access to Ina Road; rear <i>north</i> access would <i>will</i> be improved; <i>south access provided from North Camino de Oeste</i>
Long John Silvers <i>Chicken Nuevo</i> ; G&L Properties LLC	4640 W. Ina Road	221-38-0460	Frontage landscaping, eliminate direct access to Ina Road
Jack in the Box; Edwin F. & Diane D. Thorp Trust	4600 W. Ina Road	221-38-0450	Frontage landscaping, eliminate direct access to Ina Road
Waffle House Inc.	4601 W. Ina Road	214-01-004A	Eliminate direct access to Ina Road; new access provided on Camino de Oeste
<i>Enterprise Rental Car; Robins Ina Plaza, LLC</i>	<i>4545 W. Ina Road</i>	<i>101-05-010C</i>	<i>Frontage landscaping, signs, building, and parking; eliminate direct access to Ina Road; provide access to remnant property from new loop road</i>
<i>Phil's Sheds, West Ina LLC</i>	<i>4435 W. Ina Road</i>	<i>101-05-009D</i>	<i>Eliminate direct access to Ina Road, loss of small buildings, division of property</i>
Tucson Electric Power; Unisource Energy Corporation	4445 W. Ina Road	214-01-005A 101-05-008F	Landscaping, fencing
Chuy's Baja Broiler; Marlee Saguaro LLC; Edwards Ina Lee Mar Inc.	4505 W. Ina Road, 4499 W. Ina Road	<i>101-05-1180</i> 101-05-1190	Frontage and rear landscaping, parking reduction, eliminate direct access to Ina Road.
Former service station (unoccupied); Danny K. & Jhonette Dobbs Revok Tr 70% & Genevieve Dobbs 30% <i>DMCAY Property LLC</i>	4479 W. Ina Road	101-05-008D	Eliminate west driveway to Ina Road
Marana (public ROW – alley)	North of Ina Road between Camino de la Cruz and Camino de Oeste	—	Convert public alley to road ROW
Circle K Stores Inc.	4540 W. Ina Road	225-36-014F	Frontage landscaping, relocate driveway to Ina Road farther east <i>eliminate direct access to Ina Road, access provided from North Camino de Oeste</i>
Motel 6; Wade William Tr.	4630 W. Ina Road	221-38-0420	Frontage landscaping <i>Landscaping</i>

(continued on next page)

Table 9. Commercial and municipal properties (partial acquisition) (continued)

Business and ownership	Address	Parcel No. ^a	Impacts
Ruthrauff Road vicinity			
Jack in the Box, Chevron; Grant Road Industries <i>Industrial</i> , LLC	3030 W. El Camino del Cerro	101-20-040D	Eliminate access to El Camino del Cerro from property driveway
State of Arizona	West of I-10 ^c , south of El Camino del Cerro, adjacent to eastbound frontage road	103-66-0970	None identified
Unoccupied; Parsons Properties LLC	3060 W. El Camino del Cerro	102-20-040C	Loss of small metal building, fencing
Vacant; Ronal <i>Ronald</i> L. & Diane Gamble ET UX	3210 W. El Camino del Cerro	101-20-036K	None identified
<i>Dow Chemical Financial Corp. well site</i>	<i>North of El Camino del Cerro adjacent to southern side of the ServiGas property</i>	<i>101-20-0430</i>	<i>Potential impact on well site</i>
Pima County well site	North of El Camino del Cerro adjacent to northern side of the ServiGas property	101-20-036C	Potential impact on well site
Comeau Properties LLC (commercial, light industrial)	3180 W. El Camino del Cerro	101-20-036N	Fencing, vegetation in existing wash
ServiGas; Heritage Operating LP	3170 W. El Camino del Cerro	101-20-036M	Fencing, storage area, vegetation in existing wash
State of Arizona drainage way	North of El Camino del Cerro adjacent to Stewart Title property	101-20-039A	Eliminate floodway <i>drainage ditch</i> ; water would <i>will</i> be piped to Ruthrauff Road storm drain
Vacant; City of Tucson	3145 W. El Camino del Cerro	103-04-001M	Potential impact to flood-control berm
Union Pacific Railroad ROW	East of I-10 at Ruthrauff Road	103-06-091B 101-15-036B	Full width ROW impacts north and south of Ruthrauff Road to accommodate new structures across railroad
Gilbert Pump; Gilbert Properties	2840 W. Ruthrauff Road	101-15-039A	Loss of largest building and office trailer, parking, fencing, signs; eliminate direct access to Ruthrauff Road
Weber Group, LLC; Insearch Investments LLC	2838 W. Ruthrauff Road, 4849 N. Davis Ave	101-15-040A	Loss of only building, storage, fencing; eliminate direct access to Ruthrauff Road
Unknown name; Ross Intertraders LLC	4844 N. Davis Ave	101-15-030A	Fencing, vegetation
Neff Rental; Atlas Holdings Three LLC	2819 W. Ruthrauff Road	101-07-066A	Loss of office building, parking, fencing; eliminate direct access to Ruthrauff Road
Associated with Penske Truck Rental; James Harold Matthews	4845 N. Maryvale Ave.	101-15-041J	Fencing

(continued on next page)

Table 9. Commercial and municipal properties (partial acquisition) (continued)

Business and ownership	Address	Parcel No.	Impacts
Ruthrauff Road vicinity (continued)			
Whitney Burns Shutters, Inc.; RJ&K Investments Ltd. and O’Hair Partners LLC	2755 W. Ruthrauff Road <i>2745 W. Ruthrauff Road</i> <i>2739 W. Ruthrauff Road</i>	103-07-015B 103-07-014B <i>103-07-13B</i>	Frontage, parking, landscaping; eliminate property access to Ruthrauff Road; new access would <i>will</i> be provided from the east side of the property
Commercial (unknown name); Hoke, Frank	2722 W. Violet Ave.	103-07-0170	Frontage landscaping
Pacific Pride Service station; LBI Investments Enterprises Limited	4700 N. Highway Drive	103-07-016A	Frontage landscaping
Casas Adobes Elks Lodge No. 2663	4684 N. Highway Drive	103-07-026C	Fencing, landscaping, storage, patio
Laborers Union, Hurst, Don and Brenda <i>SPG Ventures LLC</i>	2713 W. Violet Ave.	103-07-026A	Fence, and possibly shade canopy
Frontage roads			
Marana drainage way	Adjacent to eastbound frontage road north of Starcommerce Way	226-35-005C	Drainage channel
Clayton Homes; Ina Road Group LLC	7400 N. Starcommerce Way	226-35-0210 226-35-02A <i>226-35-020A</i>	Vegetation, parking, signage, fencing; may affect some modular homes
Marana public ROW (Starcommerce Road)	Adjacent to eastbound frontage road	—	Existing ROW; use as road would <i>will</i> continue
Harley Davidson of Tucson, Chilton Properties LLC	7355 N. I-10 Eastbound Frontage Road	226-35-019A	None identified <i>Driveway from eastbound frontage road reconstructed; possible loss of motorcycle display space (concrete slab)</i>
Red Roof Inn; R-Roof I LLC	4940 W. Ina Road	226-35-013G	Eliminate direct access to frontage road
Mike Jacobs Sports Park; Pima County	7051 N. Casa Grande Highway,	214-02-028A 214-01-0060 214-01-0030 <i>214-02-028A</i> 214-02-028B 101-05-0200	Fencing, landscaping, parking, loss of some storage and shade structures
Pima County ROW (Walker Road)	Adjacent to eastbound frontage road	101-05-019A 101-05-0220	Existing ROW; use as road would <i>will</i> continue
California Portland Cement (sand and gravel extraction); CPC Arizona Holdings Inc.	Adjacent to eastbound frontage road near Sunset Road	101-07-106P 101-18-004C	Fencing and vegetation along frontage; also see discussion in text on following page
Lance’s RV Center; NSS RV Central OG Ltd. Partnership	6260 N. Travel Center Dr.	101-06-0740	Landscaping, drainage

Note: Blue shading indicates specific property is discussed in the text preceding the table.

^a Pima County Assessor’s parcel number from Pima County Map Guide; dash indicates no parcel number was available.

^b right-of-way ^c Interstate 10

Page 39, to be included after paragraph 3

If Pima County's Sunset Road connection project is delayed, ADOT will proceed with reconstruction of I-10 and close the Sunset Road TI; for additional discussion, see the Access along Sunset Road section in Part III. The TI will be closed until it is reconstructed in conjunction with Pima County's improvements. During the closure, drivers will use Orange Grove Road or Ruthrauff Road to access properties along the frontage roads.

Page 40, paragraph 4

I-10 and Orange Grove Road ~~would~~ *will* remain open during project construction; however, TI closures ~~would~~ *will* be required for approximately 15 to 18 months during reconstruction of the Ina, Sunset, and Ruthrauff Road TIs.² Only one TI ~~would~~ *will* be closed at a time. Therefore, access to adjacent TIs ~~would~~ *will* be maintained during construction. Access to all properties ~~would~~ *will* be maintained during construction; however, construction activities and traffic control ~~would~~ *will* contribute to traffic congestion, resulting in more travel time to access properties. The congestion and access conditions may deter some customers during project construction on a temporary basis. Small businesses affected by reconstruction of the Ina Road or Ruthrauff Road TIs ~~would~~ *will* be eligible for assistance from the RTA's Main Street business assistance program.³

Page 53, last paragraph

FHWA determined that because the Build Alternative would likely affect archaeological sites and one historic linear site determined eligible for NRHP listing under Criterion D, a finding of "adverse effect" is appropriate for the proposed project. SHPO concurred with FHWA's determination of project effect in a letter sent to FHWA dated September 28, 2011. In addition, concurring letters were received from ASM, Pima County, Town of Marana, Hopi Tribe, Tohono O'odham Nation, Tonto Apache Tribe, and Yavapai-Prescott Indian Tribe. Furthermore, SHPO concurred with FHWA's determination that one historic linear site would not be adversely affect by the project in a letter sent to FHWA dated March 2, 2012. In addition, concurring letters were received from ASLD, ASM, Pima County, Town of Marana, Hopi Tribe, Tohono O'odham Nation, and Yavapai-Prescott Indian Tribe. SHPO also concurred with FHWA's recommendation that none of the properties within the APE evaluated in the architectural inventory qualify for inclusion in the NRHP in a letter sent to FHWA dated April 30, 2012. *The Advisory Council on Historic Preservation was consulted with in a letter dated April 23, 2012, and concurred with the findings of the architectural evaluation and the overall project finding of adverse affect.* In addition, concurring letters were received from the ASLD, *ASM*, Town of Marana, the Hopi Tribe and Yavapai-Prescott Indian Tribe. Pima County did not concur, commenting that the historic context used to evaluate the mixed use, commercial, and industrial properties was not adequate. ~~The consultation period for the architectural inventory is still open and consulted parties may still comment. Consultation with Pima County regarding its comment is ongoing.~~ *In a response dated July 3, 2012, FHWA agreed that "...incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries...of platted residential subdivision" does not adequately convey the integral and essential nature of mixed-use land use development in the project vicinity, detracts from other portions of the report that acknowledge the integral history of mixed land use in the area. FHWA further states that "...a close reading of the document gives*

² *The Sunset Road TI may be closed for a longer period of time if Pima County's project is delayed—see the Access along Sunset Road section in Part III.*

³ See program website for additional information: <www.rtamobility.com/MainStreet.aspx>.

adequate context within which to evaluate the architectural resources in the project area.” On the basis of these findings, and the concurrences of other consulting parties, FHWA does not intend to further consult on the eligibility determinations. Copies of the letters are in Appendix C.

[Recent letters are in Appendix D.]

Page 59, 1. Existing Conditions, paragraph 2

~~The Rillito PM₁₀ nonattainment area was designated because in the past the area did not meet federal health based standards for PM₁₀.~~ *ADEQ has submitted the Rillito Limited Maintenance Plan to EPA and has requested that the area be re-designated. The Rillito area has only exceeded the PM₁₀ standards in recent years on days that ADEQ has determined were exceptional events, and those exceedance days should not count against the area for consideration of the re-designation request.* Nonattainment status was attributed to nearby agricultural areas, emissions from Arizona Portland Cement, and fugitive dust emissions from vehicular traffic. Since designation, the region has experienced significant growth, yet managed to attain the PM₁₀ NAAQS.

Page 60, paragraph 2

An evaluation of MSATs is required for all projects. Based on the projected future traffic volumes for the project, a Level 3 MSAT evaluation was conducted. The project area was ~~modeled~~ *analyzed* for MSAT concentrations to compare the air quality effects of the No Action Alternative and Build Alternative conditions for the design year (2040) and interim year (2015) with existing conditions (ADOT 2011a).

Page 60, to be added after paragraph 4

Transportation projects that are within nonattainment or maintenance areas and are not exempt require an analysis that “. . . must document that no new local PM₁₀ violations will be created and the severity or number of existing violations will not be increased as a result of the project.” In March 2006, EPA and FHWA issued a joint guidance document on performing hot-spot analyses in PM_{2.5} and PM₁₀ nonattainment and maintenance areas. The methodology may involve the comparison of the project to an area with similar characteristics, review of findings from air quality studies that may have been performed, or other qualitative approaches. Those projects that are exempt from the analysis include various mass transit, safety, and transportation support activities. On December 20, 2010, EPA released transportation conformity guidance for performing quantitative PM_{2.5}/ PM₁₀ hot-spot analyses for project-level transportation projects. Qualitative analyses are permitted during a 2-year grace period. Any analysis begun during the grace period can be completed after the end of the grace period.

A qualitative analysis for PM_{2.5} is not required because of the attainment status of the project area. A very small portion of the project area near the northern terminus lies within a nonattainment area for PM₁₀. It is unlikely that the impacts from the proposed improvements within this limited area will cause or contribute to an exceedance of the PM₁₀ standard. This is based on the following factors:

- *Fugitive dust sources are a large contributor to ambient concentrations of PM₁₀.*
- *The proposed improvements will provide improved access from I-10 to the surrounding area and reduce travel time and congestion on connecting roads in the area.*
- *Diesel exhaust is not a major contributor to ambient concentrations of PM₁₀.*
- *The reduction in traffic delays will reduce truck idling time and emissions.*

- *Ambient concentrations of PM₁₀ measured in the area are well below the NAAQS.*

The net effect of the proposed improvements is expected to reduce the regional impact on air quality from those impacts that would occur if the improvements were not completed. This conformity determination meets all of the applicable Clean Air Act Section 176(c) requirements for federally funded or approved transportation projects. Specifically, the requirements for PM hot-spot analyses are codified at 40 Code of Federal Regulations §§ 93.116 and 93.123. By meeting these regulatory requirements as well as other requirements in the conformity regulations, this conformity determination demonstrates compliance with requirements of Clean Air Act Section 176(a)(1).

Page 60, last paragraph

The Clean Air Act requires that the Build Alternative conform to the adopted RTP and 5-year TIP. The Build Alternative reflects the improvements included in the current RTP (updated in 2012). In addition, the project-specific air quality analysis demonstrates the project *complies with the requirements of Clean Air Act Section 176(a)(1) and* is not likely to cause or contribute to the severity or number of violations of the NAAQS.

Page 61, paragraph 2

~~Since this project extends 1 mile into the Rillito PM₁₀ nonattainment area, a project level analysis would be performed prior to completion of final design to demonstrate conformity.~~

Page 62, first paragraph

~~**Arizona Department of Transportation Design Responsibilities**~~

- ~~• Prior to completion of final design, a project level PM₁₀ analysis would be conducted to confirm project conformity with the Rillito PM₁₀ nonattainment area.~~

Part VI. Conclusion

[Page references in Table 26 refer to pages in the Draft EA.]

Table 26. Summary of environmental assessment process

Environmental consideration	Build Alternative	No Action Alternative	Mitigation for the Build Alternative
Land ownership, jurisdiction, and land use (see page 31)	Convert approximately 23.58 20.5 acres of commercial, municipal, residential, and park uses to transportation use	No impacts	Acquisition consistent with the Uniform Act ^a
Social and economic considerations (see page 33)	Displacement of 2 residences, 13 commercial properties, and 1 municipal property Partial acquisition/encroachment for 52 43 properties Encroachment and change in access for businesses Elimination of traffic/emergency delays from railroad crossing Improved level of service, traffic operation, and emergency access Congestion and closures during construction	No acquisitions or displacements No change in access or encroachment Continuing congestion, poor level of service Continued traffic and emergency delay for at-grade railroad crossings No construction impacts	Acquisition consistent with the Uniform Act (page 26) Completion of local access improvements prior to traffic interchange closure Continued access during construction Traffic control coordinated with public safety and transportation agencies
Title VI and environmental justice (see page 43)	No disproportionate adverse impacts on study area populations anticipated Benefits and adverse impacts would will accrue proportionally to all populations	No impacts	None applicable
Cultural resources (see page 50)	Significant archaeological deposits are likely to be uncovered Historic road segment would will be replaced with modern road; historic railroad alignment would will be spanned by crossroads No NRHP ^b -eligible architectural properties, historic districts, or subdivisions would will be affected	No impacts	Archaeological testing and data recovery Cessation of work when cultural resources are encountered Compliance with Programmatic Agreement
Section 4(f) (see page 54)	<i>De minimis</i> impacts to Mike Jacob Sports Park and historic railroad alignment would will result	No impacts	Replacement of lost parking and landscaping Continued access to parks and trails during construction
Air quality (see page 57)	Short-term air quality impacts during construction Overall air quality would will be improved as a result of congestion relief	No construction impacts No air quality improvement	Contractor would will control, reduce, remove, or prevent air pollution during construction Compliance with state laws on air quality ^c

(continued on next page)

Table 26. Summary of environmental assessment process (continued)

Environmental consideration	Build Alternative	No Action Alternative	Mitigation for the Build Alternative
Noise levels (see page 62)	Temporary noise during construction A 0- to 6-dBA ^d increase in traffic noise levels by 2040; several properties would <i>will</i> experience a 1- to 5-dBA reduction in noise levels from existing levels	No construction noise impacts A 2- to 4-dBA increase in traffic noise levels by 2040	Update of noise analysis based on final design Implementation of standard specifications for noise control during construction
Utilities and railroads (see page 68)	Existing utilities would <i>will</i> need to be relocated Grade separation with railroad	No utility impacts At-grade crossing with railroad would <i>will</i> continue	Coordination with affected utilities Plan review by Union Pacific Railroad Customer notification of service interruptions
Visual resources (see page 70)	Change in freeway views Increase in traffic interchange elevation Localized view changes (realigned intersections, new connector roads, introduction of retaining walls)	No impacts	Architectural and landscape treatments
Water resources (see page 72)	Project activities during construction have the potential to affect surface and groundwater	No impacts	Compliance with Sections 404 and 401 of the Clean Water Act Use of best management practices and implementation of a Stormwater Pollution Prevention Plan to comply with the Safe Drinking Water Act, sole source aquifer requirements, and Section 402 of the Clean Water Act
Drainage and floodplains (see page 80)	Introduction of new structures into the floodplain; but would <i>will</i> not increase <i>adversely affect</i> floodplain elevation	No impacts	Floodplain managers' review of final plans
Vegetation and invasive species (see page 83)	Minor removal of native vegetation Potential to introduce invasive species through construction activities	No impacts	State notification regarding native plant removal Native seeding of disturbed soils Invasive species controls
Threatened and endangered species, designated critical habitat, and sensitive species (see page 85)	May affect native plants and potential burrowing owl habitat	No impacts	Preconstruction survey for burrowing owl; avoidance or relocation

(continued on next page)

Table 26. Summary of environmental assessment process (continued)

Environmental consideration	Build Alternative	No Action Alternative	Mitigation for the Build Alternative
Hazardous materials (see page 88)	<p>Deep borings during construction may contact groundwater contamination</p> <p>Sites within or adjacent to project limits have the potential to contain contaminants</p> <p>Construction would <i>will</i> involve demolition of structures that may contain lead or asbestos</p>	No impacts	<p>Additional assessment of properties for acquisition</p> <p>Lead and asbestos testing/abatement</p> <p>Cessation of work if suspicious materials exposed</p> <p>Implementation of a CMMP^e for work interacting with contaminated groundwater plume</p> <p>NESHAP^f notification for structure demolition</p>
Material sources and waste materials (see page 92)	Approximately 500,000 cubic yards of fill material would <i>will</i> be needed	No impacts	<p>Review and approval of materials source sites prior to use</p> <p>Controls for disposal of materials</p>
Secondary impacts (see page 93)	<p>Minor, positive impacts on air quality and railroad operation</p> <p>Moderate, positive impacts on land use and socioeconomics</p> <p>Moderate, negative impacts on noise</p>	<p>Minor, neutral impacts on land use, air quality, and railroad operation</p> <p>Moderate, negative impacts on socioeconomics and noise levels</p>	None applicable
Cumulative impacts (see page 94)	<p>Neutral impacts on land use</p> <p>Positive impacts on socioeconomics and air quality</p> <p>Minor negative impacts on cultural resources and noise</p>	<p>No impacts on cultural resources</p> <p>Neutral impacts on land use, socioeconomics, air quality, and noise</p>	None applicable

^a Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

^b National Register of Historic Places

^c Arizona Revised Statutes § 49-401 et seq. on air quality; Arizona Administrative Code, Title 18, Chapter 2 on Air Pollution Control

^d A-weighted decibel

^e Contaminated Media Management Plan

^f National Emissions Standards for Hazardous Air Pollutants