

Arizona Department of Transportation Final Air Quality Technical Memo: State Route 189, International Border to Grand Avenue Federal-aid No. STP-189-A(201)T ADOT Project No. 189 SC 000 H8045 01L

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Appendix A. Project of Air Quality Concern Questionnaire and Interagency Consultation

Acronyms and Abbreviations

ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
CAA	Clean Air Act
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
I-19	Interstate 19
LOS	level of service
LRTP	Long-range Transportation Plan
MPO	metropolitan planning organization
NA	nonattainment area
NAAQS	National Ambient Air Quality Standards
РМ	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 microns or less
PM _{2.5}	particulate matter with an aerodynamic diameter of 2.5 microns or less
POE	Port of Entry
SEAGO	Southeastern Arizona Governments Organization
SIP	State Implementation Plan
STIP	State Transportation Improvement Program
SR	State Route
ТІ	traffic interchange
TIP	transportation improvement program
vpd	vehicles per day

1 Introduction

This report discusses the air quality status of the State Route (SR) 189 project area with respect to criteria pollutants for which the National Ambient Air Quality Standards (NAAQS) have been established.

This report also discusses whether the proposed project would be considered a "project of air quality concern" by the U.S. Environmental Protection Agency (EPA) and therefore would require detailed, project-level air quality modeling to demonstrate transportation conformity in the Nogales particulate matter (PM_{10} and $PM_{2.5}$) nonattainment areas.

2 **Proposed Action**

The proposed action is located in the city of Nogales in Santa Cruz County, Arizona, and would extend from milepost 0.6 (just north of the Mariposa Port of Entry [POE]) on SR 189 to Interstate 19 (I-19) and on to milepost 3.75 at Grand Avenue (also known as Business I-19 or the Tucson–Nogales Highway) (Figures 1 and 2).

What are attainment, nonattainment, and maintenance areas?

An attainment area is an area that meets (or "attains") the NAAQS for a given air pollutant.

A nonattainment area is an area that does not meet the NAAQS for a given air pollutant.

A maintenance area is an area previously designated as a nonattainment area that has been redesignated to attainment status and is required to have a maintenance plan.







Figure 2. Project vicinity

The Recommended Build Alternative consists of spot intersection improvements, roadway widening, new medians, drainage improvements, additional traffic signalization, a roundabout that large freight trucks traveling to and from the Mariposa POE can maneuver at the intersection of SR 189 and Target Range Road, and other access management strategies on the SR 189 roadway corridor between the Mariposa POE and Grand Avenue. The Recommended Build Alternative also includes improvements at the Mariposa Traffic Interchange (TI) at I-19 and SR 189. The interim configuration consists of the SR 189 roadway corridor improvements noted above and an at-grade flyover ramp for the eastbound-to-northbound SR 189 to I-19 movement at the Mariposa TI. The ultimate configuration would add two grade-separated structures over Frank Reed Road to provide eastbound-to-northbound I-19 and southbound-to-westbound SR 189 Mariposa TI flyover connectivity (Figures 3, 4, and 5).

The Mariposa TI interim configuration improvements consist of a flyover ramp from eastbound SR 189 to northbound I-19. The flyover would be a one-lane ramp that merges with northbound I-19. The entrance to the flyover would be an at-grade entrance ramp just east of the SR 189/Frank Reed Road intersection. The entrance to northbound I-19 from the flyover ramp would be north of the existing northbound I-19 entrance ramps. The entrance and exit ramp merges would occur on the outside of the northbound Ianes. The TI improvements on SR 189 include widening in the eastbound direction west of the Mariposa TI to add a third through lane. Reconstruction or widening of the Mariposa Wash bridge structure would accommodate the flyover bridge structure.

The Mariposa TI ultimate configuration improvements consist of a southbound to westbound right exit flyover ramp from I-19 to SR 189 with grade separation over Frank Reed Road, if additional funds become available in the near future. The eastbound to northbound flyover ramp from SR 189 to I-19 north constructed as the interim configuration would be modified if the ultimate configuration is constructed. The modification would involve eliminating the at-grade entrance portion of the flyover ramp and making it grade separated over Frank Reed Road, touching down in the center median on SR 189 where the right exit ramp touches down for the ultimate configuration. This would provide a smoother construction phasing of the ultimate configuration and better consistency of how the exit and entrance ramps would operate in a grade-separated manner. Improvements along SR 189 include widening west of the Mariposa TI to accommodate the flyover structure. Reconstruction or widening of the Mariposa Wash bridge structure would accommodate the flyover bridge structure.



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Figure 3. Recommended Build Alternative interim configuration (southern portion of corridor)

Information presented is preliminary and subject to change throughout the study

Proposed Roadway Edge
 Proposed Median

Proposed Signalized Intersection

Existing Signalized Intersection

STP-189-A(201)T 189 SC 000 H8045 01L State Route 189, International Border to Grand Avenue Aerial Date: January 2013 Exhibit Date: October 7, 2016





Figure 4. Recommended Build Alternative interim configuration (northern portion of corridor)

Information presented is preliminary and subject to change throughout the study

State Route 189, International Border to Grand Avenue

Final Air Quality Technical Memo



- Proposed Flyover Approach/Departure
- Proposed Bridge Structure

Proposed Median



Exhibit Date: October 7, 2016

Aerial Date: January 2013

US. Department of Transportation Federal Highway Administration

State Route 189, International Border to Grand Avenue

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Information presented is preliminary and subject to change throughout the study

- Proposed Roadway Edge (Ultimate)
- Proposed Roadway Edge (Interim)
 - Proposed Flyover Approach/Departure
 - Proposed Bridge Structure

Proposed Median

Proposed Signalized Intersection

Existing Signalized Intersection



Aerial Date: January 2013 Exhibit Date: October 7, 2016

STP-189-A(201)T 189 SC 000 H8045 01L State Route 189, International Border to Grand Avenue

Land uses in the project corridor consist of produce warehousing and distribution facilities, light industrial development, and areas of undeveloped land between the area north of the Mariposa POE and I-19. Between I-19 and Grand Avenue, SR 189 passes through a commercial area that includes two large shopping centers.

3 Need for the Project

The Mariposa POE is one of the 10 busiest cargo ports along the U.S.-Mexico border and is a full-service facility responsible for providing customs inspections of commercial and privately owned vehicles. It is the main commercial processing location for Arizona and handles nearly half of all agricultural commodities entering the U.S. from Mexico. Approximately over 300,000 heavy-duty commercial trucks (82 percent of all trucks entering Arizona from Mexico) pass through the Mariposa POE annually (Pavlakovich-Kochi 2015). In addition, about 2.8 million privately owned vehicles pass through the Mariposa POE annually (General Services Administration 2015). An important need for this proposed action is to improve accessibility and travel times for large freight trucks traveling to and from the Mariposa POE.

The Mariposa POE has been expanded and modernized in 2014 to accommodate the anticipated increase in the volume of traffic that will pass through the facility. At full build-out, the Mariposa POE is anticipated to process about twice the current volume of traffic. Local development has also increased the volume of traffic in the area, and, given the development that is planned for currently undeveloped land in the area and along the SR 189 corridor, this increase in traffic is expected to continue (Arizona Department of Transportation [ADOT] 2008).

Under existing traffic conditions, several intersections on SR 189 between the POE and I-19 experience long delays during the peak midday travel periods. With the expected increase in traffic from both the expanded Mariposa POE and the increase in local traffic, ADOT expects traffic operations to deteriorate. Since SR 189 is a key link for the movement of goods and people between Mexico and the U.S., maintaining acceptable traffic operations on SR 189 is critical for keeping the produce warehousing and light industrial manufacturing operations in Nogales competitive in the global marketplace.

3.1 Level of Service

A common descriptor of traffic operational characteristics is level of service (LOS), which is expressed as letters A to F. LOS A corresponds to minimal delay at signalized intersections and free-flow conditions on highways, while LOS F means long delays at signalized intersections and congested stop-and-go conditions on highways.

Table 1 shows the LOS at select intersections on SR 189 in 2011 and in 2040 with and without the proposed project. Under 2011 conditions, intersections in the SR 189 corridor are operating at LOS A to LOS C and will degrade to LOS D, LOS E or LOS F at several intersections in the future. ADOT forecasts that expanding the Mariposa POE will add about 14,700 vehicles per day (vpd) in 2040, including about 3,000 additional heavy trucks. Without improvements to SR 189, a number of intersections will operate at an unacceptable LOS F beginning as early as 2020.

	Level of service (AM/MID/PM)		Interim	Ultimate
SR 189 intersection	2014 2040 (no build)		2040 (build)	2040 (Build)
Loma Mariposa Drive	A/A/A	NA/F/E ^a	NA/C/C	NA/C/C
Frank Reed Road	B/B/B	NA/F/F	NA/D/D	NA/D/D
Interstate 19 southbound ramps	C/C/C	NA/D/C	NA/B/B	NA/B/B
Interstate 19 northbound ramps	B/C/C	NA/D/C	NA/B/B	NA/B/B
Congress Drive	B/B/B	NA/C/C	NA/B/B	NA/B/B

Table 1. Levels of service at intersections on SR 189, 2011 and 2040

Sources: Wilson & Company (2016)

Notes: AM = morning peak, MID = midday peak, PM = afternoon peak, SR = State Route

^a NA = not available; AM level of service not reported for 2040 scenarios

3.2 Traffic Volume Estimates for 2011 and 2040

Table 2 shows the existing and projected traffic volumes (including the percentage of heavy trucks) on segments of SR 189 between the POE and I-19, which would the same for the Recommended Build and No-Build Alternatives in 2040. Trucks registered in Mexico are not allowed to operate more than 25 miles from the international border, so their loads must be transferred to U.S.-based carriers at truck terminals (this explains the relatively large proportion of trucks near the POE and the decreasing proportions between the POE and I-19).

As shown in Table 2, daily traffic volumes on SR 189 in 2011 ranged from about 9,600 vpd to about 20,000 vpd, with heavy trucks accounting for 8 to 21 percent of the total volume. In 2040, traffic volumes are projected to range from about 28,000 vpd to about 38,000 vpd, with heavy trucks accounting for 10 to 21 percent of the total volume.

The percentages of daily truck traffic would remain basically the same in 2040 as compared with the 2011 percentages. This is attributable to a fixed growth rate projected for local traffic and because the Mariposa POE acts as a "meter" or "gate." Only a specific number of vehicles can be processed through the border each hour. Therefore, international freight traffic is a function of the Mariposa POE processing capacity, and improvements on SR 189 cannot generate an increase in this traffic beyond the capacity of the POE. Since the traffic analysis assumes that the POE is operating at full capacity, there would be no net change in the number of trucks, including diesel trucks, on the SR 189 corridor between the Recommended Build and No-Build Alternatives.

	2011		2040	
Segment	Daily traffic ^a	% trucks (number of trucks)	Daily traffic ^a	% trucks (number of trucks)
Mariposa POE to Target Range Road	9,600	21 (2,016)	28,670	20 (5,734)
Target Range Road to Industrial Park Drive (south)	11,100	18 (1,998)	28,070	20 (5,614)
Industrial Park Drive (south) to Frank Reed Road	11,100	18 (1,998)	27,570	21 (5,790)
Frank Reed Road to Interstate 19	18,420	13 (2,395)	38,090	17 (6,475)
East of Interstate 19 ramps	19,940	8 (1,595)	37,500	10 (3,750)
West of Grand Avenue	18,270	8 (1,462)	30,020	11 (3,302)

Source: Adapted from HDR (2011), Tables 5 and 15

Notes: POE = Port of Entry, SR = State Route

^a includes both POE traffic and local traffic

4 Air Quality Status of Nogales, Arizona

The Nogales PM₁₀ NA is 66 miles south of Tucson and covers about 76 square miles along the international border with Mexico in Santa Cruz County. The city of Nogales and portions of Rio Rico, an unincorporated community, occupy most of the NA (Figure 6).

The same area was also designated a $PM_{2.5}$ NA in 2009. On January 7, 2013, EPA determined that the area was in attainment of the 2006 24-hour $PM_{2.5}$ standard. Based on that determination, the requirements to submit a State Implementation Plan with an attainment demonstration were suspended for as long as the area continued to meet the 24-hour $PM_{2.5}$ standard (78 *Federal Register* 887). However, this determination did not change the area's designation as a $PM_{2.5}$ NA. Thus transportation conformity requirements for both PM_{10} and $PM_{2.5}$ apply.



Figure 6. Nogales PM₁₀ and PM_{2.5} Nonattainment Areas

Source: Arizona Department of Environmental Quality eMaps (https://gisweb.azdeq.gov/arcgis/emaps/?topic=nonattain)

4.1 PM_{2.5} Emissions Inventory in the Nogales PM_{2.5} Nonattainment Area

The *Final 2012 State Implementation Plan – Nogales PM*₁₀ *Nonattainment Area* was approved by EPA on September 25, 2012 (77 *Federal Register* 58962). The State Implementation Plan (SIP) demonstrates that "but for" PM₁₀ emissions originating in Mexico, the area would be in attainment for the PM₁₀ NAAQS.

For international border areas (such as Nogales, Arizona), Section 179 of the Clean Air Act (CAA) states (emphasis added):

(d) ATTAINMENT OF PM10 LEVELS – Notwithstanding any other provision of law, any State that establishes to the satisfaction of the Administrator that, with respect to PM_{10} nonattainment area in such State, such State would have attained the national ambient air quality standard for PM_{10} by the applicable attainment date, but for emissions emanating from outside the United States, shall not be subject to the provisions of section 188(b)(2).

4.1.1 Emissions Inventory for the Nogales PM₁₀ Nonattainment Area

The emissions inventory required by the CAA for the SIP for the Nogales PM_{10} NA was initiated with the 2008 National Emissions Inventory for Santa Cruz County, Arizona, and was apportioned to the NA based on population and land use ratios or the actual locations of stationary sources. The 2008 emissions were then projected to 2011 based on expected growth rates for population, industry, and motor vehicle activity for the NA.

Table 3 shows the annual PM_{10} emissions in 2008 and 2011 in the NA and the proportion attributable to each source category. As shown in Table 3, a variety of dust-generating sources accounted for more than 93 percent of the annual emissions in 2011. On-road mobile sources (including both gasoline and diesel vehicles, as well as resuspended dust from paved roads) accounted for less than 10 percent of the annual 2011 emissions in the PM_{10} NA.

	2008		20	011
Source category	Tons per year	% of 2008 total	Tons per year	% of 2011 total
Dust – unpaved roads	864.9	56.5	864.9	56.6
Dust – road construction	267.0	17.4	267.0	17.5
Dust - commercial/industrial/institutional construction	142.6	9.3	142.6	9.3
Dust – paved road dust	121.4	7.9	121.4	7.9
Fuel combustion (residential) - wood	24.0	1.6	25.7	1.7
Waste disposal - residential garbage burning	23.0	1.5	24.7	1.6
Dust – residential construction	23.9	1.6	23.9	1.6
Mobile - on-road diesel (includes brake, tire, and exhaust)	19.4	1.3	13.2	0.9
Mobile – nonroad equipment (diesel)	8.5	0.6	8.5	0.6
Mobile - on-road gasoline (includes brake, tire, and exhaust)	8.4	0.5	7.9	0.5
Commercial cooking – charbroiling	6.3	0.4	6.7	0.4
Fires – prescribed fires	3.4	0.2	3.4	0.2
Agriculture – crops and livestock dust	4.3	0.3	4.3	0.3

Table 3. PM_{10} emissions in the Nogales PM_{10} NA, 2008 and 2011

Table 3. PM_{10} emissions in the Nogales PM_{10} NA, 2008 and 2011

	2008		2011	
Source category	Tons per year	% of 2008 total	Tons per year	% of 2011 total
Mobile – nonroad equipment (gasoline)	3.1	0.2	3.1	0.2
Mobile – aircraft	2.3	0.2	2.3	0.2
Other sources	8.2	0.5	8.5	0.6
Total	1,530.7	100	1,528.1	100

Source: Adapted from Arizona Department of Environmental Quality (2012)

Notes: NA = nonattainment area, PM₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less

4.1.2 PM₁₀ Contribution from Nogales, Mexico

Chapter 4 and Appendices C and D of the SIP for the Nogales PM_{10} NA (Arizona Department of Environmental Quality [ADEQ] 2012) include a detailed evaluation of emissions originating from the Nogales Municipality area in Mexico to demonstrate that, but for those emissions, the Nogales PM_{10} NA would meet the PM_{10} standard. The Nogales Municipality has similar PM_{10} emission sources as does the Nogales PM_{10} NA; primarily fugitive dust from unpaved and paved roads, as well as combustion sources and construction dust.

The evaluation (conducted by EPA on behalf of ADEQ) concluded that there was a clear pattern of low wind speeds from the south (that is, coming from the Mexico side of the border) on days during which a PM_{10} exceedance was recorded at the Nogales air quality monitor on the Arizona side of the border. The evaluation further concluded that 27 of 29 exceedances at the Nogales air quality monitor (and possibly all 29 exceedances) were attributable to PM_{10} sources from across the international border.

An NA meets the NAAQS for PM_{10} when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms per cubic meter are less than or equal to 1. Based on the evaluation conducted by EPA, the agency concluded that at least 27 of 29 exceedance days were attributable to transport of PM_{10} emissions from sources on the Mexico side of the international border.

When considering the two remaining exceedances, EPA's annual exceedance rate for 2007 to 2009 was 0.7 exceedance per year. Since the annual expected exceedance rate was less than 1, the State demonstrated that the Nogales PM_{10} NA would attain the PM_{10} NAAQS "but for" PM_{10} emissions originating in Mexico.

4.2 PM_{2.5} Emissions Inventory in the PM_{2.5} State Implementation Plan

On September 6, 2013, ADEQ adopted and submitted to EPA the *Arizona State Implementation Plan Revision for the Nogales PM*_{2.5} *Nonattainment Area.* The revision was in response to EPA's determination (78 *Federal Register* 887) that the Nogales NA was meeting the 24-hour PM_{2.5} standard in accordance with the agency's Clean Data Policy. This action suspended requirements for ADEQ to submit specific SIP elements related to attainment of the PM_{2.5} NAAQS, including reasonable further progress milestones, attainment demonstrations, control measures, and contingency measures. However, EPA still required ADEQ develop a SIP for the Nogales PM_{2.5} NA that addressed the remaining applicable CAA requirements including the submission of an emissions inventory.

4.3 Emissions Inventory for the Nogales PM_{2.5} Nonattainment Area

The emissions inventory required by the CAA for the SIP for the Nogales $PM_{2.5}$ NA was initiated with the 2008 National Emissions Inventory for Santa Cruz County, Arizona, and was apportioned to the NA based on population and land use ratios or the actual locations of stationary sources. The 2008 emissions were then projected to 2010 based on expected growth rates for population, industry, and motor vehicle activity for the NA.

Table 4 shows the annual primary $PM_{2.5}$ emissions in 2008 and 2010 in the NA and the proportion attributable to each source category. As with PM_{10} emissions, a variety of dust-generating sources accounted for a majority (approximately 70 percent) of the annual $PM_{2.5}$ emissions in 2010. On-road mobile sources (including gasoline vehicles, diesel, and paved road dust) accounted for approximately 16 percent of the annual 2010 emissions in the $PM_{2.5}$ NA.

	2008		20)10
Source category	Tons per year	% of 2008 total	Tons per year	% of 2010 total
Dust – unpaved roads	154.9	35.6	156.6	36.1
Dust – road construction	64.0	14.7	64.0	14.8
Dust – paved road dust	49.6	11.4	50.1	11.5
Dust - commercial/industrial/institutional construction	34.2	7.9	34.2	7.9
Fuel combustion (residential) – wood	28.7	6.6	29.1	6.7
Waste disposal – residential garbage burning	25.3	5.8	25.6	5.9
Other sources	23.5	5.4	23.7	5.5
Mobile - on-road diesel (includes brake, tire, and exhaust)	20.5	4.7	16.0	3.7
Mobile – nonroad equipment (diesel)	10.2	2.3	10.2	2.3
Commercial cooking – charbroiling	7.3	1.7	7.3	1.7
Dust – residential construction	5.7	1.3	5.8	1.3
Mobile - on-road gasoline (includes brake, tire, and exhaust)	4.6	1.1	4.2	1.0
Fires – prescribed fires	3.0	0.7	3.0	0.7
Mobile – nonroad equipment (gasoline)	3.0	0.7	3.0	0.7
Agriculture – crops and livestock dust	0.9	0.2	0.9	0.2
Mobile – aircraft	0.3	0.1	0.3	0.1
Total	435.6	100	433.9	100

Table 4. Primary PM2.5 emissions in the Nogales PM2.5 NA, 2008 and 2010

Source: Adapted from Arizona Department of Environmental Quality (2013)

Notes: NA = nonattainment area, PM_{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less

4.3.1 PM_{2.5} Precursor Pollutants and Contribution from Nogales, Mexico

The EPA Clean Data finding for the Nogales $PM_{2.5}$ NA suspended several SIP requirements, specifically the requirement for an attainment demonstration. As a result, the SIP did not fully investigate the ambient $PM_{2.5}$ concentration impacts associated with precursor pollutants (nitrogen oxides, ammonia, sulfur dioxide, and volatile organic compounds) or pollutant contributions from Nogales, Mexico.

Given the finding from the PM_{10} attainment demonstration described in Section 4.1.2 above, it is highly likely ambient $PM_{2.5}$ concentrations in the Nogales NA are influenced by the same patterns of low wind speeds from the south that result in PM_{10} exceedances. Both the PM_{10} and $PM_{2.5}$ air quality monitors are in the same place, making it likely that days with high ambient PM_{10} concentrations are also recording high concentrations of ambient $PM_{2.5}$.

Likewise, the influence of precursor pollutants on secondary $PM_{2.5}$ formation and subsequently on ambient air quality cannot be determined without conducting a full attainment demonstration. Given that approximately 70 percent of the primary $PM_{2.5}$ emissions in the area come from dust-related sources and the area has low relative humidity, it is likely precursor pollutants do not significantly influence ambient $PM_{2.5}$ concentrations in the NA.

5 Transportation Conformity Requirements in Nonattainment Areas

All state governments are required to develop a SIP, which explains how the State will comply with requirements of the federal CAA. The CAA requires that transportation plans, programs, and projects that are developed, funded, or approved by the Federal Highway Administration (FHWA) must demonstrate that such activities "conform" to the SIP.

Transportation conformity requirements apply to any transportation-related criteria pollutants for which the project area has been designated a nonattainment or maintenance area. For the proposed project, these criteria pollutants are PM_{10} and $PM_{2.5}$.

A transportation project is said to "conform" to the provisions and purposes of the SIP if the project, both alone and in combination with other planned projects, does not:

- Cause or contribute to new air quality violations of the NAAQS,
- Worsen existing violations of the NAAQS, or
- Delay timely attainment of the NAAQS or required interim milestones.

5.1 Transportation Conformity Requirements in Rural Areas

The proposed project is in a PM₁₀ and PM_{2.5} NA. However, this area is not served by an established metropolitan planning organization (MPO) and is considered an isolated rural area for the purpose of transportation conformity. Isolated rural areas do not have federally required metropolitan transportation plans or transportation improvement programs (TIPs) and do not have projects that are part of a regional emissions analysis of any MPO's metropolitan transportation plan or TIP.

In rural areas, a project must be found by FHWA to be consistent with the statewide long-range transportation plan. FHWA's planning regulations allow statewide transportation plans to be policy plans and not project-specific. In such cases, the project does not have to be specifically listed in the plan but should be consistent with the overall goals and objectives of the statewide plan.

The Arizona Long-Range Transportation Plan (LRTP) identifies a number of goals and performance measures to improve the state's transportation system over the next 25 years (ADOT 2011). Table 5 outlines the LRTP goals and relevant performance measures and how the proposed project is consistent with those goals.

Table 5.	Long-Range	Transportation	Plan goals and	performance measures

Plan goal	Performance measures	Project consistency
Improve Mobility and Accessibility	Congestion, speed, and travel delay	 Maintain or improve level of service at key intersections Reduce average delay time Improve average speed Reduce average number of stops
Preserve and Maintain State Transportation System	Pavement and bridge deficiencies; maintenance spending	Structural improvements to accommodate flyover ramps at Interstate 19
Support Economic Growth	Congestion, speed, travel delay, and resources available for economic initiatives Job growth/job retention	Improvements needed to accommodate anticipated traffic volumes in 2040; see mobility and accessibility improvements above
Link Transportation and Land Use	Congestion, speed, travel delay, and improved access management	See mobility and accessibility improvements above
Consider Natural, Cultural, and Environmental Resources	Change in vehicle-related emissions, level of environmental certification	Improved mobility and improved level of service would reduce vehicle emissions
Enhance Safety and Security	Fatalities and serious injuries	Potential for reducing vehicle conflicts by implementing access controls, intersection improvements, and new signalization

In addition to being consistent with LRTP goals as described above, projects in rural nonattainment or maintenance areas must conform to certain criteria. Table 6 outlines the transportation conformity criteria for projects in isolated rural nonattainment and maintenance areas and their applicability to the proposed project.

Table 6. Transportation conformity requirements in rural nonattainment and maintenance areas

Regulation	Description
Section 93.110 – Latest Planning Assumptions	Both the PM_{10} and $PM_{2.5}$ SIPs for the Nogales NA were based on the latest population, employment, air quality, and travel demand information available at the time.
Section 93.111 – Latest Emissions Model	The EPA MOVES emissions model was used to estimate tailpipe emissions from cars, trucks, motorcycles, and buses, as well as brake and tire wear.
Section 93.112 – Consultation	The PM ₁₀ emission budgets for the Nogales NA and other modeling parameters were developed in consultation with ADEQ, EPA, and ADOT. Likewise, the <i>Project Level PM Quantitative Hot-Spot Analysis - Project of Air Quality Concern Questionnaire</i> was developed in consultation with all applicable agencies.
Section 93.113(d) – Transportation Control Measures	The PM_{10} SIP (Table 5-1) incorporates a number of approved control measures such as fugitive dust controls, materials handling, and other control measures. The $PM_{2.5}$ SIP did not include control measures as a result of EPA's Clean Data finding.
Section 93.114 – Criteria & Procedures: Currently Conforming Transportation Plan and TIP	The proposed project is consistent with the goals and objectives of the Statewide LRTP and is included in the current and 2018-2022 STIP. Both the LRTP and STIP have been shown to conform to both the PM_{10} and $PM_{2.5}$ SIPs through the most recent Regional Conformity Analysis (2017).

Description
The proposed project is consistent with the goals and objectives of the Statewide LRTP and is included in the current and 2018–2022 STIP.
No formal hot spots were established for the Nogales NA by the PM_{10} SIP. Similarly, no hot spots were identified in the $PM_{2.5}$ SIP.
The proposed project will comply with control measures contained in the PM_{10} SIP. No control measures are included in the $PM_{2.5}$ SIP.
Emissions budgets were established in the PM_{10} SIP for paved road dust, unpaved road dust, on-road mobile sources, and road construction dust. The $PM_{2.5}$ SIP did not establish emissions budgets. The most recent Regional Conformity Analysis demonstrates conformance of the LRTP and STIP to the PM_{10} emissions budgets established in the Nogales PM_{10} NA SIP.
The Nogales PM _{2.5} NA does not include emissions budgets. However, regional conformity still applies. Therefore, an interim test must be conducted demonstrating the roadway network established by the LRTP and STIP (or "build" scenario) will not exceed the emissions generated by either the no build (or baseline) scenario or established, pollutant-specific "baseline" year. The most recent Regional Conformity Analysis provides the results of the interim emissions tests for the LRTP and STIP.
Projects in nonattainment and maintenance areas are required to demonstrate that they will not cause or contribute to a localized exceedance of the NAAQS for which the area was designated (that is, will not create a hot spot). ADOT, in conjunction with ADEQ, developed a <i>Project Level PM Quantitative Hot-Spot Analysis - Project of Air Quality Concern Questionnaire</i> to identify those projects requiring hot-spot analysis. A questionnaire specific to the project is provided in Appendix A. In consultation with ADOT, ADEQ, and FHWA, it was determined the State Route 189 project is not a project of air quality concern.

Table 6. Transportation conformity requirements in rural nonattainment and maintenance areas

Notes: ADOT = Arizona Department of Transportation, ADEQ = Arizona Department of Environmental Quality, CO = carbon monoxide, EPA = U.S. Environmental Protection Agency, FHWA = Federal Highway Administration, LRTP = long-range transportation plan, NA = nonattainment area, NAAQS = National Ambient Air Quality Standards, PM_{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less, PM₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less, SIP = State Implementation Plan, STIP = State Transportation Improvement Program

The proposed project meets all transportation conformity requirements, complies with the implementation of the control measures included in the PM_{10} SIP, and does not interfere with their implementation. The $PM_{2.5}$ SIP does not include any control measures due to the EPA's Clean Data finding on January 7, 2013 (see 78 *Federal Register* 887).

6 Conclusions

The proposed action is located in Nogales, Arizona, in Santa Cruz County. The portion of the county where the proposed project is located has been designated by EPA as being in nonattainment for the $PM_{2.5}$ and PM_{10} NAAQS. As a result, the project must conform to the area's two air quality plans (SIPs).

On March 10, 2006, EPA published a final rule establishing transportation conformity requirements for analyzing the local particulate matter (PM) air quality impacts of transportation projects (71 *Federal Register* 12468). An interagency consultation process plays an important role in identifying whether a project requires an analysis, referred to as a PM "hot-spot" analysis. A hot-spot analysis assesses the air quality impacts at a local level and estimates of the likelihood of future pollutant concentrations exceeding

the relevant NAAQS near the project. An interagency consultation process involving FHWA, EPA, ADEQ, and the Southeastern Arizona Governments Organization (SEAGO) determined that this project is not of "air quality concern" according to 40 Code of Federal Regulations 93.123(b)(1) and EPA's *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM*_{2.5} and PM₁₀ Nonattainment and Maintenance Areas (EPA-420-B-13-056). It, therefore, does not require a hot-spot analysis. This decision was based on the traffic volume of 38,000 vpd and because the project would not significantly increase diesel truck traffic or affect any congested intersection with a significant number of diesel vehicles. On December 29, 2016 ADOT concluded interagency consultation by notifying interested parties that this project will proceed as a project that does not require a quantitative PM10 hot-spot analysis under 40CFR 93.123(b). The decision and interagency consultation is documented in the Project Level PM Quantitative Hot-Spot Analysis Project of Air Quality Concern Questionnaire found in Appendix A. As a result, the requirements of the CAA and 40 Code of Federal Regulations 93.116 are met for the project.

7 References

- Arizona Department of Environmental Quality (ADEQ). 2012. *Final 2012 State Implementation Plan Nogales PM*₁₀ Nonattainment Area. August 24. <u>www.azdeq.gov/environ/air/plan/download/Nogales%20PM10SIP%20Final.pdf</u>
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- Wilson & Company. 2016. Year 2040 Traffic Operations Analysis Report. SR-189: International Border to Grand Avenue Design Concept Report and Environmental Studies.
- U.S. Environmental Protection Agency (EPA). 2013. *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM*_{2.5} and *PM*₁₀ Nonattainment and Maintenance Areas. November.

Appendix A. Project of Air Quality Concern Questionnaire and Interagency Consultation



Project Level PM Quantitative Hot-Spot Analysis -Project of Air Quality Concern Questionnaire

Project Setting and Description

The Arizona Department of Transportation (ADOT), in association with the Federal Highway Administration (FHWA), proposes to improve State Route (SR) 189 from the Mariposa Port of Entry (POE) at the U.S.-Mexico border to Interstate 19 (I-19) at the existing Mariposa Traffic Interchange (TI) and east to Grand Avenue (milepost 0.6 to milepost 3.75) in the city of Nogales, Santa Cruz County, Arizona (Figures 1 and 2).





Figure 1. Project location







Figure 2. Project vicinity



The Recommended Build Alternative is a corridor management approach approximately 3.7 miles in length that would improve traffic flow on existing SR 189 through intersection improvements and elimination or consolidation of existing driveways. Commercial and passenger vehicle traffic would continue to use the existing corridor for access to both I-19 and the industrial, commercial, and other activity centers in the corridor. This alternative consists of spot intersection improvements, roadway widening, new medians, drainage improvements, additional traffic signalization, additional through lanes and right-turn bays between Loma Mariposa Road and Grand Avenue, a roundabout that large freight trucks traveling to and from the Mariposa POE can maneuver at the intersection of SR 189 and Target Range Road, and other access management strategies along the SR 189 roadway corridor. These improvements are designed to reduce congestion on SR 189 and at the Mariposa TI, especially for large freight trucks traveling to and from the Mariposa POE. This alternative also includes improvements to the Mariposa TI, which connects I-19 and SR 189.

ADOT has developed both interim and ultimate configuration solutions for the Mariposa TI improvements based on currently available funding. The interim configuration can be built with currently available ADOT funding, while the ultimate configuration would require additional funding in the reasonably foreseeable future. The Mariposa TI interim configuration improvements consist of a flyover ramp from eastbound SR 189 to northbound I-19. The flyover would be a one-lane ramp that merges with northbound I-19. The entrance to the flyover would be an at-grade entrance ramp just east of the SR 189/Frank Reed Road intersection. The entrance to northbound I-19 from the flyover ramp merges would occur on the outside of the northbound lanes. The TI improvements on SR 189 include widening in the eastbound direction west of the Mariposa TI to add a third through lane. Reconstruction or widening of the Mariposa Wash bridge structure would accommodate the flyover bridge structure (Figures 3 and 4).

The Mariposa TI ultimate configuration improvements consist of a southbound to westbound right exit flyover ramp from I-19 to SR 189 with grade separation over Frank Reed Road, if additional funds become available in the near future. The eastbound to northbound flyover ramp from SR 189 to I-19 north constructed as the interim configuration would be modified if the ultimate configuration is constructed. The modification would involve eliminating the at-grade entrance portion of the flyover ramp and making it grade separated over Frank Reed Road, touching down in the center median on SR 189 where the right exit ramp touches down for the ultimate configuration. This will provide a smoother construction phasing of the ultimate configuration and better consistency of how the exit and entrance ramps would operate in a grade-separated manner. Improvements along SR 189 include widening west of the Mariposa TI to accommodate the flyover structure. Reconstruction or widening of the Mariposa Wash bridge structure would accommodate the flyover bridge structure (Figure 5).

























Aerial Date: January 2013



This proposed action is in the Nogales nonattainment area (NA) for particulate matter (PM) for both PM_{2.5} and PM₁₀. The Nogales NA area is not served by an established metropolitan planning organization (MPO) and is considered an isolated rural area for the purpose of transportation conformity for air quality (Nogales had a 2015 population of approximately 20,250).

As shown in Table 1, the proposed action is consistent with the goals and objectives of the state long-range transportation plan. Because this project also is a regionally significant non-exempt project in an area not served by an MPO, it will require a regional conformity analysis.

Plan goal	Performance measures	Project consistency
Improve Mobility and Accessibility	Congestion, speed, and travel delay	 Project would: maintain or improve level of service at key intersections reduce average delay time improve average speed reduce average number of stops
Preserve and Maintain State Transportation System	Pavement and bridge deficiencies; maintenance spending	Structural improvements to accommodate flyover ramps at Interstate 19
Support Economic Growth	Congestion, speed, travel delay, and resources available for economic initiatives Job growth/job retention	Improvements needed to accommodate anticipated traffic volumes in 2040 (See mobility and accessibility improvements above.)
Link Transportation and Land Use	Congestion, speed, travel delay, and improved access management	(See mobility and accessibility improvements above.)
Consider Natural, Cultural, and Environmental Resources	Change in vehicle-related emissions, level of environmental certification	Improved mobility, improved level of service, reduced vehicle emissions
Enhance Safety and Security	Fatalities and serious injuries	Potential for reducing vehicle conflicts by implementing access controls, intersection improvements, and new signalization

Table 1.	Long-range	transportation	plan	goals and	performance measures
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Project Purpose and Need

The Mariposa POE is a significant traffic generator for SR 189. It is one of the busiest cargo ports along the U.S.-Mexico border. In addition to border crossing activity, significant shipping, warehousing, and commercial activity occurs along the corridor. This activity results in a significant amount of traffic, both locally and from the Mariposa POE, consisting of many vehicle types that influence SR 189's capacity and operational ability to handle and distribute traffic in an efficient and timely manner. Local growth in the area, including planned development on vacant land adjacent to



SR 189, will also contribute to potentially significant future congestion and unacceptable level of service (LOS) on SR 189. As a result, without improvements, all intersections along SR 189 are forecast to operate at an unacceptable LOS as early as 2020 and at LOS F by 2040. In conclusion, improvements along the existing SR 189 are needed to: (1) provide sufficient operational capacity on SR 189 to accommodate the Mariposa POE's recent expansion, (2) handle future projected traffic levels for the design year of 2040 at an acceptable LOS, and (3) reduce vehicle conflicts.

The purpose of the proposed action is to increase traffic-carrying capacity by improving the SR 189 roadway and intersections – especially at the Mariposa TI – and to improve the efficiency of SR 189 by enhancing access control, improving intersections, and completing selected areas of roadway widening. A detailed explanation of the purpose and need for the proposed action to improve SR 189 will be included in the Draft Environmental Assessment (EA).

A detailed evaluation of existing and forecast 2040 traffic volumes for this proposed action is documented in the *Year 2040 Traffic Operations Analysis Report* (Wilson & Company 2016). The Wilson & Company study built upon the original traffic study prepared for this proposed action, the *Draft Forecast Analysis Report* (Chowdhury and Gorton 2011).

Project Assessment

The following questionnaire is used to compare the proposed action to a list of project types in 40 Code of Federal Regulations (CFR) 93.123(b) requiring a quantitative analysis of local particulate emissions (hot spots) in nonattainment or maintenance areas, which include:

- i) New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;
- ii) Projects affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F because of an increase in traffic volumes from a significant number of diesel vehicles related to the project;
- iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM₁₀ or PM_{2.5} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

If the project matches one of the listed project types in 40 CFR 123(b)(1) above, it is considered a project of local air quality concern and the hot-spot demonstration must be based on quantitative analysis methods in accordance with 40 CFR 93.116(a) and the consultation requirements of 40 CFR 93.105(c)(1)(i). If the project does not require a PM hot-spot analysis, a qualitative assessment will be developed that demonstrates that the project will not contribute to any new localized violations, increase the frequency or severity of any existing violations, or delay the timely attainment of any



National Ambient Air Quality Standards (NAAQS) or any required emission reductions or milestones in any nonattainment or maintenance area.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published $PM_{2.5}$ and PM_{10} Hot-Spot Analyses in Project-Level Transportation Conformity Determinations for the New $PM_{2.5}$ and Existing PM_{10} National Ambient Air Quality Standards; Final Rule describing the types of projects that would be considered a project of air quality concern and that require a hot-spot analysis (71 Federal Register 12468–12511). Specifically, on page 12491, EPA provided the following clarification: "Some examples of projects of air quality concern that would be covered by § 93.123(b)(1)(i) and (ii) are: A project on a new highway or expressway that serves a significant volume of diesel truck traffic, such as facilities with greater than 125,000 annual average daily traffic (AADT) and 8% or more of such AADT is diesel truck traffic;" and "Expansion of an existing highway or other facility that affects a congested intersection (operated at Level-of-Service D, E, or F) that has a significant increase in the number of diesel trucks; …" These examples will be used as the baseline for determining whether the project is a project of air quality concern (POAQC).

New Highway Capacity

Is this a new highway project that has a significant number of diesel vehicles? Example: total traffic volumes >125,000 annual average daily traffic (AADT) and truck volumes >10,000 diesel trucks per day (8% of total traffic).

NO – This is not a new highway project that has a significant number of diesel vehicles.

Expanded Highway Capacity

Is this an expanded highway project that has a significant increase in the number of diesel vehicles?

NO – This is not an expanded highway project that would have a significant increase in the number of diesel vehicles. Table 2 provides average daily traffic from both the Mariposa POE and local traffic and the number and percentage of trucks, which is the same for the Recommended Build and No-Build Alternatives in 2040. The percentages of daily truck traffic will remain basically the same in 2040 as compared to the 2011 percentages. This is due to a fixed growth rate projected for local traffic and because the Mariposa POE acts as a "meter" or "gate." Only a specific number of vehicles can be processed through the POE each hour. Therefore, international freight traffic is a function of the Mariposa POE processing capacity, and improvements on SR 189 cannot generate an increase in this traffic beyond the capacity of the POE. Since the traffic analysis assumes that the POE is operating at full capacity, there would be no net change in the number of trucks, including diesel trucks, on the SR 189 corridor between the Recommended Build and No-Build Alternatives. The Recommended Build Alternative would not be increasing roadway capacity, except in the immediate vicinity of the Mariposa TI, where SR 189 would be widened for approximately ³/₄ mile on either side of the interchange (between Loma Mariposa Road and Grand Avenue) to help move traffic more efficiently through the existing intersections and



turn lanes at a higher LOS. Rather, the proposed action would improve traffic operations, intersection LOS, and accessibility.

Traffic volume forecasts for both the Recommended Build and No Build Alternatives account for the total anticipated demand for the corridor, which consists of both Mariposa POE activity and local activity. Forecasts of the Mariposa POE assume the port is operating at 100 percent of its processing capacity (approximately 5,700 trucks per day — bidirectional). Forecasts of the local traffic volume assume build-out of remaining light industrial land uses adjacent to the corridor over the next 24 years. Given the lack of competing travel corridors in the project area, there is, in essence, no latent (or induced) demand resulting from the Build Alternative.

Past, current, and future development trends along the SR 189 corridor between the Mariposa POE and Frank Reed Road show that non-transportation development would occur regardless of the SR 189 improvements. The potential contribution of the proposed action to cumulative growth effects associated with planned and unplanned increases in light industrial, manufacturing, residential, and commercial development in combination with the local and regional highway system would be the result of planning decisions made primarily by local developers in coordination with City and County agencies. The cumulative intensification of planned or unplanned growth is expected to be the result of local and regional planning decisions not dependent on the SR 189 improvements. A detailed evaluation of the cumulative impacts regarding the potential future development will be addressed in the Draft EA.



	2011		2040 (Build and No-Build Alternatives)	
Segment	Daily traffic (% trucks)	Number of trucks	Daily traffic (% trucks)	Number of trucks
Mariposa POE to Target Range Road	9,600 (21)	2,016	28,670 (20)	5,700
Target Range Road to Industrial Park Drive (south)	11,100 (18)	1,998	28,070 (16)	4,490
Industrial Park Drive (south) to Frank Reed Road	11,100 (18)	1,998	27,570 (17)	4,690
Frank Reed Road to Interstate 19	18,420 (13)	2,395	38,090 (16)	5,940
East of Interstate 19 ramps	19,940 (8)	1,595	37,500 (9)	3,350
West of Grand Avenue	18,270 (8)	1,462	30,020 (11)	3,260

Table 2.	Daily	traffic	volumes	on	segments	of SR	189
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Source: Adapted from Wilson & Company (2016)

Note: The increase in the number of trucks from Frank Reed Road to I-19 is from trucks entering SR 189 via the intersection of Industrial Park Drive from the Nogales Industrial Park and Frank Reed Road, where a number of produce and other warehouse and distribution centers are located along Grand Avenue that use Frank Reed Road to gain access to SR 189 to reach I-19.

Projects with Congested Intersections

Is this a project that affects a congested intersection (LOS D or greater) that has a significant number of diesel trucks, OR will change LOS to D or greater because of increased traffic volumes for significant numbers of diesel trucks related to the project?

NO – This project will not affect a congested intersection (LOS D or greater) because none of the intersections would have a significant number of diesel trucks as shown in Table 2 above, or will change LOS to D or greater because of increased traffic volumes of significant numbers of diesel trucks related to the project. As shown in Table 3 for the 2040 Recommended Build Alternative, the LOS would improve at each of the intersections along SR 189 and the Mariposa TI during both the midday and PM peak hour, when the highest traffic volumes occur.

Currently, traffic to and from the Mariposa TI must use a traditional diamond-style interchange requiring traffic to stop and idle during several traffic signal cycles before entering the Interstate. The proposed action would result in improved travel times at the Mariposa TI southbound ramp of 19 seconds (LOS B) and 18 seconds (LOS B) for the interim and ultimate configurations, respectively, and by 13 seconds (LOS B) for both the interim and ultimate configurations at the Mariposa TI northbound ramp. Under the No-Build Alternative, the travel times would be 56 seconds (LOS F) at the Mariposa TI southbound



ramp and 51 seconds (LOS E) at the Mariposa TI northbound ramp. This will result in a reduction of air emissions under the Recommended Build Alternative for both the interim and ultimate configurations as opposed to the No-Build Alternative.

As noted above, there is no expected increase in truck traffic between the Recommended Build and No-Build Alternatives, because truck traffic is limited by the capacity of the POE.

SR 189 intersection	2040 No-Build Alternative Midday & PM peak hour	2040 Build Alternative (Interim & Ultimate) Midday & PM peak hour
Loma Mariposa Drive	Е	С
Frank Reed Road	Е	D
Interstate 19 southbound ramps	F	В
Interstate 19 northbound ramps	Е	В
Congress Drive	Е	В

Table 3. Levels of service at intersections on SR 189, 2040

Source: Adapted from Wilson & Company (2016)

New Bus and Rail Terminals

Does the project involve construction of a new bus or intermodal terminal that accommodates a significant number of diesel vehicles?

NO – This project does NOT involve construction of a new bus or intermodal terminal that accommodates a significant number of diesel vehicles.

Expanded Bus and Rail Terminals

Does the project involve an existing bus or intermodal terminal that has a large vehicle fleet where the number of diesel buses (or trains) increases by 50 percent or more, as measured by arrivals?

NO – This project does NOT involve an existing bus or intermodal terminal that has a large vehicle fleet where the number of diesel buses (or trains) increases by 50 percent or more.

Projects Affecting PM Sites of Violation or Possible Violation

Does the project affect locations, areas, or categories of sites that are identified in the PM_{10} or $PM_{2.5}$ applicable plan or implementation plan submissions, as appropriate, as sites of violation or potential violation?



NO – The PM₁₀ and PM_{2.5} State Implementation Plans (SIPs) for the Nogales NA did not identify any specific sites or potential sites of violation. The attainment demonstration for PM₁₀ concluded that "but for" emissions originating in Mexico, the Nogales PM₁₀ NA would be in attainment of the standard. Therefore no specific sites or potential sites of violation were identified. An attainment demonstration was not conducted for PM2.5 as it was not required due to a "clean data" finding. Thus no specific sites or potential sites of violation were identified.

The emissions inventory prepared for the Final PM_{10} SIP determined that on-road mobile source emissions, including paved road dust, account for less than 10 percent of the annual emissions in the Nogales PM_{10} NA. Finally, as noted above in Table 3, the project would not exacerbate poor LOS conditions but rather improve LOS along the SR 189 corridor and Mariposa TI.

POAQC Determination

The project is not anticipated to affect LOS D conditions or worsen such conditions at intersections with a significant number of diesel vehicles, and the project would not significantly increase the number of diesel vehicles in 2040. In addition, but for cross border emissions originating from Mexico, the region would be in attainment for PM_{10}

Therefore, ADOT is presenting this project for interagency consultation in accordance with 40 CFR 93.105 as a Project that is NOT of Air Quality Concern and thereby will not require a PM_{10} hot-spot analysis. While this project does not require a hot-spot analysis, other conformity provisions apply and are addressed in the Air Quality Technical Memo and the Draft EA.

Interagency Consultation Results

On December 8, 2016 ADOT provided a copy of this questionnaire to the following consultation parties, the Environmental Protection Agency (EPA), FHWA, Southeastern Arizona Government Organization (SEAGO), and the Arizona Department of Environmental Quality (ADEQ). There were no objections to the project determination and on December 29, 2016 ADOT concluded interagency consultation by notifying interested parties that this project will proceed as a project that does not require a quantitative PM10 hot-spot analysis under 40CFR 93.123(b). On January 31, 2017 ADOT held a public hearing on the Draft Environmental Assessment and the Draft Project Level Air Quality Conformity Analysis Memo with a public comment period through February 14, 2017, no air quality comments were received on these documents.

References

HDR. 2011. State Route 189, International Border to Grand Avenue Draft Traffic Forecast Report.

Wilson & Company. 2016. Year 2040 Traffic Operations Analysis Report. SR-189: International Border to Grand Avenue Design Concept Report and Environmental Studies. February 2016.

Wednesday, May 25, 2016

Conference Call: 866-583-7984/Call-in Code: 1968494#

MEETING PURPOSE:

 To consult on project level air quality concern determination for the SR 189 improvements and other topics of concern for the project in Nogales PM10/PM2.5 nonattainment area. All materials are posted at ADOT's Sharefile site: <u>https://adot.sharefile.com/app/#home/shared/fo42875f-462b-43e2-b59d-278629b5c71d</u>

ITEM 1: Overview of SR189 project design, project area, schedule and description. Refer to document "H8045 SR 189 Study Update_May 2016.pptx"

ITEM 2: Discussion on updating the Project of Air Quality Concern Questionnaire, review of response to comments from EPA.

Refer to document "EPA Comments_PM Questionaairre_5-13-16.docx" Refer to document "DFT 2040 Traffic Rpt-Version 1_021016.pdf"

ITEM 3: Discussion of requirements for isolated rural nonattainment area methodology. 93.105(c)1(vi) Choosing conformity tests and methodologies for isolated rural nonattainment and maintenance areas, as required by §93.109(g)(2)(iii).

Refer to word document posted "ADOT Template RCA_clean.docx"

(g) Isolated rural nonattainment and maintenance areas requirements

§93.110	Latest planning assumptions
§93.111	Latest emissions model
§93.112	Consultation
§93.113(d)	TCMs
§93.116	CO, PM10, and PM2.5 hot-spots.
§93.117	PM10 and PM2.5 control measures
§93.118 and/or §93.119	Emissions budget and/or Interim emissions

Similar discussions occurred with ADEQ on Feb. 22, 2016

ITEM 4: Discussion of next steps and further action for project.



Wednesday, May 25, 2016 11:00 - 12:15

Teleconference

Participants: Michael Barton (HDR), Laura Berry (EPA), Beverly Chenausky (ADOT), Alan Hansen (FHWA), Mark Hoffman (ADOT), Jeff Houk (FHWA), Joonwon Joo (ADOT), Marinela Konomi (ADOT), Carlos Lopez (ADOT), Catherine Luke-McDowell (ADEQ), Louis Maslyk (HDR), Clifton Meek (EPA), Amy Moran (Wilson & Co.), Karina O'Connor (EPA), Meg Patulski (EPA), Ed Stillings (FHWA), Ryan Templeton (ADEQ), Jerry Walmsley (EPA), Tremaine Wilson (FHWA).

ITEM 1: Carlos Lopez provided an overview of SR 189. This study is conducting an environmental study and a Design Concept Report (DCR) that will include up to a 30% design, the main environmental document is an Environmental Assessment (EA) in partnership with the FHWA. The current funding includes \$2M for the environmental study and 30% level of design FY2016, for FY2018 programmed \$4M for final design of this project and FY2021 we anticipate \$24M for construction. That covers the fiscal constraints and the main deliverables for the project which would be the EA and DCR. Question: Can you address the expansion of the Mariposa Port of Entry, it sounds like that has already been completed, and how that expansion has impacted traffic between 2014 when that was completed and now? How does the 2011 traffic data compare with post-construction traffic data? Answer: We initiated a study in 2011 and that is when developed the tool that we used for the analysis. It is important that we keep the 2011 as our baseline as the tool for model was calibrated under those conditions. In early 2015 we (Wilson) collected traffic samples related to traffic volumes to aide in forecast for 2014. Found that the forecast was consistent with what was found in the field and felt that the methodology that was used to forecast future traffic was doing a good job, therefore we continued to use the methodology looking out to 2040. The interim study on 2014 report provided a snapshot of the interchange performance found that it was not performing as good as 2011. Generally speaking the traffic data in the 2014 traffic report should be consistent with how things are operating now.

Continuing on slide number 5, summary table of existing and future forecasts, the segments began at POE moving closer to I-19 interchange. There's a high school and commercial area near interchange traffic begins to increase. These estimates take into account the expansion and assume that the POE operates at full capacity.

Q: Assuming the difference in increase traffic is due to increase in local traffic and not international traffic, is that correct?

A: Yes, that's correct.

The next slide, our study process followed two stage approach stage one was to identify a corridor to link traffic and in prior studies we identified three corridor alternatives that are noted on slide 6. The first alternative was a corridor management corridor with access management and improvement at interchange. The second is an expressway alternative one for local traffic and adjacent a frontage road to serve as expressway to the I-19. The third alternative is called a connector route, will create a new connection at the POE and include improvements at existing interchange.

The next slide shows the six criteria to evaluate alternatives and through further discussions and public input the corridor management was moved as preferred alternative, the other two were eliminated. Then the next goal was to identify types of improvements with the recommended route.

Q: Can you elaborate on the local preference on the corridor management alternative? Why wouldn't the other two alternatives accommodate that? How is economic development incorporated? What was the time horizon for the land use development in the area?

A: Recognizing that SR189 is a trade corridor and economic corridor there was a strong support in keeping similar configuration and access as much as possible to enable economic development. The other alternatives would by-pass the current access and activities to their properties. We also received a resolution from City of Nogales and Santa Cruz County Supporting alternative one. Also concern about bypassing access to existing areas, losing drive by businesses, there are plans to develop commercial and industrial uses along the route. We assumed the development included in traffic model build out, one was expansion of the port and the other for local development was originally done with a growth rate but then refined by looking at land use and zoning for undeveloped parcels and ran a trip generation based on a fully developed land use opportunities for the parcels in the project area. The draft EA includes the review of all plans that were reviewed to capture all the planned development. The planning horizon listed in EA lists the horizon of 2035.

Slide number eight and nine shows the next goal to identify best interchange concept originally identified six type including a flyover connection, a diamond interchange. Slide number ten shows the evaluation of the preferred improvements and the flyover configuration on slide eight shows preferred configuration. We refined the concepts to develop a build alternative to be used in the DCR and EA as shown on slide 11 and 12 consistent with the information we received. The connection to the high school would include a grade separation at the intersection, the blue lines are bridge structure and that bridge will go over that interchange, the red are retaining walls. This design meets traffic operation at acceptable level and allows for better access to the freeway interchange.

Q: Are you going to be adding any general purpose lanes?

A: We are adding general purpose lane east of I-19 to Grande Avenue to help move traffic through the intersection and turn lanes, generally from Grande to about Lomas Mariposa, about a mile and a half.

Slide thirteen shows the design concept consistent with \$64M construction with the two flyover ramps. The southbound exit will be improved to at right and left turn lanes, and a new flyover on the northbound, this is the ultimate build out unfunded. The funding on next slide shows a shortfall of \$40-\$80, a TIGER grant application was submitted for \$64M and there has been an appropriation for this project, there is activity to find funding for the shortfall.

Q: As a clarification, when I look at the traffic report for the DCR anything that is labeled interim would be portions that are funded and those labeled ultimate would be unfunded, is that correct?A: Yes.

Lastly our next steps, we submitted the EA to FHWA we plan on releasing in July with public hearing in early August. The DCR out to 30% design should be completed this summer with the final DCR and final EA completed in calendar year 2016.

Q: Can you make sure EPA receives a copy of EA.

A: Tremaine Wilson wanted to review EA first and would follow up with EPA to ensure they receive information.

ITEM 2: Beverly Chenausky started the discussions on additional clarifications requested by EPA for the Project of Air Quality Concern Questionnaire and review of the written responses to EPA comments. Originally we wanted to provide an updated version of the questionnaire but we thought it would be helpful if we discussed some of the questions and concerns before modifying the questionnaire. The first response regarding the CANAMEX corridor ADOT provided a response related to the designation of I-11 as a replacement of what was formally known as the CANAMEX corridor and provided an announcement of the NOI for the I-11 Tier I EIS that is under development. We are assuming most of the freight improvements will be managed through those projects as we do not have information on the improvements on the I-11.

Q: There seems to be a disconnect between the DeConcini and Mariposa port connections, wouldn't the commercial trucks be using the Mariposa and not the I-19? Will the CANAMEX corridor be over the I-19 or a new facility?

A: The 2040 build scenario includes the build out of the port, but we would not know the improvements on the I-19 until the Tier I study recommends improvements. The I-11 as identified in the FAST Act includes the I-19 from Nogales to Tucson, I-10 from Tucson to Phoenix, and US 93 from Phoenix to Nevada border. The CANAMEX terminology is no longer being used as the I-11 has been officially designated and we are in the early phases of identifying environmental impacts, the air quality impact will be addressed as part of the Tier II environmental analysis.

Amy Moran discussed most of the questions on the traffic questions. In terms to the question related to why there were no net changes in trucks between the build and the no-build alternatives, the forecast includes the maximum number of vehicles at POE and maximum build out of local traffic, the no build already incorporated worst case regardless of whether the movement actually allowable in the corridor, this maximum demand is necessary to show the benefits from the different alternatives. As clarification, there is no model available so a manual forecast on local truck and land port of entry was performed. Q: I understand max capacity POE at least 30% increase from local it is not clear why local traffic would not increase?

A: Trips are driven by origin and designation and our assumptions is corridor will generate certain number of trips regardless if they could actually occur and regardless of how long it takes. The traffic is all available traffic for both no-build and builds to evaluate complete demand in the corridor and required improvements.

Q: How is the DeConcini factored in, the buses and local traffic should be impacted?

A: There are additional local traffic documented in the 2040 report and Grande Avenue already captures this traffic.

Q: Is there is no travel demand model for this area?

A: There was no model available at the time we were developing forecast that captured the full travel demand. ADOT does have a statewide model, what was available at the time was a 2035 forecast, the statewide model is more macro and not focused to specific corridors, the STDM uses external zones that loads traffic with the DeConcini and Mariposa combined as a result the statewide model was under estimating traffic at that time of this analysis. As a result of this and other studies we did not think it was representative of the local conditions. We can provide travel demand documentation of the statewide travel demand model, for clarification.

Q: I don't understand the assumption that everything is the same regardless of what occurs in the corridor, and then you would never have an increase in travel with project? Additionally the traffic study information is presenting different results that what is in the questionnaire.

A: In this example the general purpose lane is acting as congestion relief and not an additional travel, because we are not changing accesses points or generating additional trips or travel. In the questionnaire we have a table that includes a no-build without the project that shows improvement of the LOS just not showing increase in traffic. The revised questionnaire will include more information on the traffic assumptions and results to clarify the differences between the build and no-build scenarios. We will be matching the tables between the traffic studies, the questionnaire and EA to ensure information is consistent.

In the interest of time it was discussed that the questionnaire would be revised and traffic assumptions will be summarized and distributed to the group along with a suggestion of a follow up meeting coming in the next couple of weeks. Other discussion occurred related to noting that this project will be minimally increasing the trucks over many years of the project and it is somewhat of a minor project in regards to increasing truck traffic. There were some discussion that when you read the purpose and need of the project it is describe as a major freight corridor, as such it is hard to understand how a freight improvement project would not increase traffic in the future, and that there is inconsistency between the importance of the project and the what the number show.

Item 3: Will be discussed at a later meeting, brief mention that a consultation document will be circulated describing planning assumptions for a regional analysis.

NEXT STEPS: ADOT project team will modify and change the Project of Air Quality Concern Questionnaire to clarify some of the concerns and circulate for review along with suggested range for next meeting. White paper to explain traffic data will be attached to questionnaire.



Monday, February 22, 2016

1110 W. Washington St, ADEQ

MEETING PURPOSE:

• To consult on an ADOT regionally significant project that requires a regional emissions analysis for Nogales PM10/PM2.5 nonattainment area

ITEM 1: Overview of SR189 project design, project area, schedule and description.

ITEM 2: Discussion on the use of the Nogales template use for regional analysis and data that is available from the prior emissions inventory and control measures in PM10 Plan. 40 CFR 93.105(c)1 (i) Evaluating and choosing a model (or models) and associated methods and assumptions to be used in hot-spot analyses and regional emissions analyses;

ITEM 3: Discussion of requirements for isolated rural nonattainment area methodology. 93.105(c)1(vi) Choosing conformity tests and methodologies for isolated rural nonattainment and maintenance areas, as required by §93.109(g)(2)(iii).

(g) Isolated rural nonattainment	and maintenance areas requirements
§93.110	Latest planning assumptions
§93.111	Latest emissions model
§93.112	Consultation
§93.113(d)	TCMs
§93.116	CO, PM10, and PM2.5 hot-spots.
§93.117	PM10 and PM2.5 control measures
§93.118 and/or §93.119	Emissions budget and/or Interim emissions

NEXT STEPS



Monday, February 22, 2016 11:00 – 12:00 1110 W. Washington St, ADEQ

ITEM 1: The meeting began with introductions and sign in sheet. Marinela Konomi of ADOT Environmental Planning provided an overview and presentation for the SR 189 project. Discussions occurred on the project widening road to add an additional travel lane and that this project is a project of regional significance that requires a regional conformity analysis.

ITEM 2/3: Beverly Chenausky of ADOT Environmental Planning provided a copy of template that can be used for consultant that covers all the requirements necessary for a regional conformity determination. ADEQ staff agreed that the document covered the requirements for conformity. Beverly inquired about the data and assumptions needed for the PM2.5 nonattainment area and how the PM10 construction emissions were calculated for the Motor Vehicle Emissions Budget. Ryan Templeton will be reviewing the document provided by ADOT to verify consistency with the State Implementation Plan and will be coordinating data collection with Joonwon Joo of ADOT Environmental Planning.

NEXT STEPS: ADOT air quality staff will review ADEQ's comments and information related to conformity test and methodologies for isolated rural nonattainment areas, including the models and methods used for the regional analysis then provide ADOT Project Manager an updated template as a guide for the consultant hired to conduct the regional conformity analysis.

Attachments: meeting agenda, sign in sheet, project study update presentation, Nogales PM2.5/PM10 Nonattainment Areas Case Study (template).



Beverly Chenausky

From:	Wamsley, Jerry <wamsley.jerry@epa.gov></wamsley.jerry@epa.gov>
Sent:	Tuesday, December 20, 2016 2:57 PM
То:	Beverly Chenausky; Ed Stillings; 'Christopher Vertrees'; 'tremaine.wilson@dot.gov';
	Carlos Lopez; Catherine Lucke-McDowell
Cc:	Berry, Laura; OConnor, Karina; McKaughan, Colleen; meek, clifton; Lo, Doris
Subject:	RE: Interagency Consultation: Determining Project of Air Quality Concern in SEAGO
	Region STP-189-A(201)T / 189 SC 000 H8045 01L

Hello Beverly,

Thank you for the opportunity to the review the Arizona Department of Transportation's (ADOT) Project of Air Quality Concern (POAQC) Questionnaire for SR-189, dated December 2016 regarding highway modifications and construction from the international border to Grand Avenue in Nogales, Arizona. We appreciate your efforts in addressing our questions and your revisions to this POAQC for SR-189.

We concur that this project is not a project of air quality concern and does not require a hot-spot analysis. We have no further comments.

Jerry Wamsley

From: Beverly Chenausky [mailto:BChenausky@azdot.gov]

Sent: Thursday, December 8, 2016 8:02 AM

To: Maslyk, Louis <Louis.Maslyk@hdrinc.com>; Joonwon Joo <JJoo@azdot.gov>; Wamsley, Jerry <Wamsley.Jerry@epa.gov>; OConnor, Karina <OConnor.Karina@epa.gov>; Berry, Laura <berry.laura@epa.gov>; meek, clifton <meek.clifton@epa.gov>; Ed Stillings <ed.stillings@dot.gov>; 'Templeton.Ryan@azdeq.gov' <Templeton.Ryan@azdeq.gov>; 'Christopher Vertrees' <cdvertrees@seago.org>; Patulski, Meg <patulski.meg@epa.gov>; McKaughan, Colleen <McKaughan.Colleen@epa.gov>; 'Lucke-McDowell.Catherine@azdeq.gov' <Lucke-McDowell.Catherine@azdeq.gov>; 'tremaine.wilson@dot.gov' <tremaine.wilson@dot.gov>; 'jeff.houk@dot.gov' <jeff.houk@dot.gov>; Carlos Lopez <CLopez@azdot.gov>; Ralph Ellis <REllis@azdot.gov>; Barton, Michael J. <Michael.Barton@hdrinc.com>; Witt, Jay <Jay.Witt@hdrinc.com>; Bennett, Jill <Jill.Bennett@hdrinc.com>; Amy.Moran@wilsonco.com; Sharon Gordon <sharon.gordon@dot.gov> **Subject:** Interagency Consultation: Determining Project of Air Quality Concern in SEAGO Region STP-189-A(201)T / 189 SC 000 H8045 01L

To Interested Parties:

ADOT is presenting the following project, **SR 189, International Border to Grand Avenue,** for interagency consultation per 40 CFR 93.105 as a potential project that is not a project of Air Quality Concern and thereby will not require a PM10 hot-spot analysis. If through interagency consultation it is determined that this project will not require a hot-spot analysis, other conformity provisions apply and will be addressed in the air quality analysis that will be submitted to FHWA. ADOT is requesting responses to the attached questionnaire within **10 business days**; a non-response will be interpreted as concurrence that the project is not a project of air quality concern and does not require a hot-spot analysis. If any consulted party believes this project should be treated as a project of air quality concern that requires a Quantitative PM hot-spot analysis, please document the appropriate section under 40 CFR 93.123 (b) that applies to the project and describe why the project should be treated as a project of air quality concern.

While this project may not require a quantitative hot-spot analysis, as a regionally significant project in an isolated rural PM10 and PM2.5 nonattainment area this project needs to be included in a regional conformity analysis prior to project approval, per

40 CFR 93.121(b). As required for interagency consultation per 40 CFR 93.105 (c) (ii), attached is ADOT's planning assumptions document that will be used for developing the regional conformity analysis for the Nogales nonattainment area(s). ADOT is requesting responses to the attached regional conformity analysis methodologies within **30 business days**; a non-response will be interpreted as concurrence on the planning assumptions that will be used for the regional conformity analysis.

As with before, additional technical information has been posted and shared on ADOT's ShareFile service as available, if you have any additional questions or need additional information that has not been posted prior on the ShareFile site please let me know, thanks.

Beverly T. Chenausky Air & Noise Program Manager MD EM02, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov

From: Beverly Chenausky
Sent: Friday, September 16, 2016 1:29 PM
To: 'Maslyk, Louis'; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; 'Christopher Vertrees'; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; 'Barton, Michael J.'; 'Witt, Jay'; 'Bennett, Jill'; 'Thomas Deitering'; 'Amy.Moran@wilsonco.com'
Subject: RE: H8045 SR 189 Air Quality Discussion

To All:

You should have all received a notification from ShareFile the documents have been added to the SR189 project folder, if not a link is included in the Agenda attached directing you to the project folder. There has been discussions with stakeholders on including the option of a roundabout and other project changes, a summary of the stakeholder meeting and suggested schedule have been added to the project folder. You will be notified when the information for project and regional conformity consultation is available, just wanted to provide an update on the project and let you know that there has been a shift in schedule, thanks.

Beverly Chenausky 602.712.6269

From: Beverly Chenausky Sent: Monday, May 23, 2016 4:05 PM To: 'Maslyk, Louis'; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; Christopher Vertrees; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; Barton, Michael J.; Witt, Jay; Bennett, Jill; Thomas Deitering; 'Amy.Moran@wilsonco.com' Subject: RE: H8045 SR 189 Air Quality Discussion

Please find attached agenda with supporting materials listed on ADOT's Sharefile site you should receive information notifying you that you have access to the SR189 folder and content, let me know if you have any additional questions. << File: Nogales Agenda May 25th.pdf >>

Beverly T. Chenausky

Air & Noise Program Manager MD EM04, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov << OLE Object: Picture (Device Independent Bitmap) >> Environmental Planning

-----Original Appointment-----From: Maslyk, Louis [mailto:Louis.Maslyk@hdrinc.com] Sent: Monday, May 23, 2016 10:37 AM To: Beverly Chenausky; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; Christopher Vertrees; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; Barton, Michael J.; Witt, Jay; Bennett, Jill; Thomas Deitering Subject: H8045 SR 189 Air Quality Discussion When: Wednesday, May 25, 2016 11:00 AM-12:00 PM (UTC-07:00) Arizona. Where: Conference Call: 866-583-7984/Call-in Code: 1968494#

Hello Everyone,

We have scheduled a call to further discuss the topic of air quality for the SR 189 improvements project in Nogales, Arizona based on the interagency coordination that has recently been conducted.

Suggested agenda topics for the call include:

- 1 General overview of project
- 2 Project Level Conformity Discussions on the updated POAQC (hope to send out prior to meeting for review)
- 3 Regional Conformity Analysis approach
- 4 Discussions on further action

Prior to the meeting, informational materials will be posted on the ADOT website under Interagency Consultation Meetings for May 25, 2016 at <u>http://azdot.gov/business/environmental-planning/air-quality/transportation-conformity</u>. We will let everyone know when they are posted.

Please contact Beverly Chenausky, ADOT Air Quality Lead, at 602-712-6269 or <u>bchenausky@azdot.gov</u> or me if anyone has any questions about the upcoming meeting next Wednesday May 25th from 11 am to 12 pm at the conference call number posted above. Thanks Lou Maslyk, AICP Senior NEPA Project Manager HDR 3200 E. Camelback Road, Suite 350 Phoenix, AZ 85018 D 602.474.3913 C 480.323.0298 Iouis.maslyk@hdrinc.com hdrinc.com/follow-us

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Beverly Chenausky

From:	Wilson, Tremaine (FHWA) <tremaine.wilson@dot.gov></tremaine.wilson@dot.gov>
Sent:	Friday, December 16, 2016 1:28 PM
To:	Beverly Chenausky
Cc:	Houk, Jeff (FHWA); Ed Stillings; Alan Hansen
Subject:	RE: Interagency Consultation: Determining Project of Air Quality Concern in SEAGO Region STP-189-A(201)T / 189 SC 000 H8045 01L
Follow Up Flag:	Follow up
Flag Status:	Flagged

Beverly,

Here are FHWAs comments:

- In the regional conformity analysis memo, the analysis needs to cover the full timeframe of the long range transportation plan. Right now the memo has a horizon year of 2035, but the response to comments document indicates that a 2040 plan will be adopted in 2017. Once that happens, 2040 would be a required analysis year, so timing is a factor. Using 2035 is fine as long as ADOT can make a conformity finding on the project before the 2040 plan is adopted.
- In regards to the POAQC questionnaire and with respect to the roundabout specifically, it might also be helpful if ADOT could provide an estimate of the reduction in delay compared to a signalized intersection. That should provide a significant reduction in PM emissions and help support the project.

Thanks, Tremaine

Tremaine L. Wilson

Environmental Cooridnator Federal Highway Administration Arizona Division Office Office: 602-382-8970



From: bchenausky azdot.gov
Sent: Thursday, December 08, 2016 9:02 AM
To: Maslyk, Louis; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'meek.clifton@epa.gov'; Stillings, Ed (FHWA); 'Templeton.Ryan@azdeq.gov'; 'Christopher Vertrees'; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; Wilson, Tremaine (FHWA); Houk, Jeff (FHWA); Carlos Lopez; Ralph Ellis; michael.barton hdrinc.com; Witt, Jay; Bennett, Jill; Amy.Moran@wilsonco.com; Gordon, Sharon (FHWA)

Subject: Interagency Consultation: Determining Project of Air Quality Concern in SEAGO Region STP-189-A(201)T / 189 SC 000 H8045 01L

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Beverly T. Chenausky

Air & Noise Program Manager MD EM04, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov << OLE Object: Picture (Device Independent Bitmap) >> Environmental Planning

-----Original Appointment----- **From:** Maslyk, Louis [<u>mailto:Louis.Maslyk@hdrinc.com</u>] **Sent:** Monday, May 23, 2016 10:37 AM **To:** Beverly Chenausky; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; Christopher Vertrees; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; Barton, Michael J.; Witt, Jay; Bennett, Jill; Thomas Deitering **Subject:** H8045 SR 189 Air Quality Discussion **When:** Wednesday, May 25, 2016 11:00 AM-12:00 PM (UTC-07:00) Arizona. **Where:** Conference Call: 866-583-7984/Call-in Code: 1968494#

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Lou Maslyk, AICP Senior NEPA Project Manager HDR 3200 E. Camelback Road, Suite 350 Phoenix, AZ 85018 D 602.474.3913 C 480.323.0298 Iouis.maslyk@hdrinc.com hdrinc.com/follow-us

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	Michael J.'; 'Witt, Jay'; 'Bennett, Jill'; 'Amy.Moran@wilsonco.com'; Sharon Gordon
Subject:	Interagency Consultation: Determining Project of Air Quality Concern in SEAGO Region
	STP-189-A(201)T / 189 SC 000 H8045 01L
Attachments:	RCA_Method_Assumptions_12-7-16.pdf; H8045_SR_189_Project_Level_PM-10
	_Questionnaire_V5_2016-12-06.pdf

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Beverly T. Chenausky Air & Noise Program Manager MD EM02, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov From: Beverly Chenausky
Sent: Friday, September 16, 2016 1:29 PM
To: 'Maslyk, Louis'; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; 'Christopher Vertrees'; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; 'Barton, Michael J.'; 'Witt, Jay'; 'Bennett, Jill'; 'Thomas Deitering'; 'Amy.Moran@wilsonco.com'
Subject: RE: H8045 SR 189 Air Quality Discussion

To All:

You should have all received a notification from ShareFile the documents have been added to the SR189 project folder, if not a link is included in the Agenda attached directing you to the project folder. There has been discussions with stakeholders on including the option of a roundabout and other project changes, a summary of the stakeholder meeting and suggested schedule have been added to the project folder. You will be notified when the information for project and regional conformity consultation is available, just wanted to provide an update on the project and let you know that there has been a shift in schedule, thanks.

Beverly Chenausky 602.712.6269

From: Beverly Chenausky
Sent: Monday, May 23, 2016 4:05 PM
To: 'Maslyk, Louis'; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; Christopher Vertrees; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; Barton, Michael J.; Witt, Jay; Bennett, Jill; Thomas Deitering; 'Amy.Moran@wilsonco.com'
Subject: RE: H8045 SR 189 Air Quality Discussion

Please find attached agenda with supporting materials listed on ADOT's Sharefile site you should receive information notifying you that you have access to the SR189 folder and content, let me know if you have any additional questions. << File: Nogales Agenda May 25th.pdf >>

Beverly T. Chenausky Air & Noise Program Manager MD EM04, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov << OLE Object: Picture (Device Independent Bitmap) >> Environmental Planning

-----Original Appointment----- **From:** Maslyk, Louis [<u>mailto:Louis.Maslyk@hdrinc.com</u>] **Sent:** Monday, May 23, 2016 10:37 AM To: Beverly Chenausky; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; Christopher Vertrees; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov'; 'Lucke-McDowell.Catherine@azdeq.gov'; 'tremaine.wilson@dot.gov'; 'jeff.houk@dot.gov'; Carlos Lopez; Marinela Konomi; Barton, Michael J.; Witt, Jay; Bennett, Jill; Thomas Deitering
Subject: H8045 SR 189 Air Quality Discussion
When: Wednesday, May 25, 2016 11:00 AM-12:00 PM (UTC-07:00) Arizona.
Where: Conference Call: 866-583-7984/Call-in Code: 1968494#

Hello Everyone,

We have scheduled a call to further discuss the topic of air quality for the SR 189 improvements project in Nogales, Arizona based on the interagency coordination that has recently been conducted.

Suggested agenda topics for the call include:

- 1 General overview of project
- 2 Project Level Conformity Discussions on the updated POAQC (hope to send out prior to meeting for review)
- 3 Regional Conformity Analysis approach
- 4 Discussions on further action

Prior to the meeting, informational materials will be posted on the ADOT website under Interagency Consultation Meetings for May 25, 2016 at <u>http://azdot.gov/business/environmental-planning/air-quality/transportation-conformity</u>. We will let everyone know when they are posted.

Please contact Beverly Chenausky, ADOT Air Quality Lead, at 602-712-6269 or <u>bchenausky@azdot.gov</u> or me if anyone has any questions about the upcoming meeting next Wednesday May 25th from 11 am to 12 pm at the conference call number posted above. Thanks

Lou Maslyk, AICP Senior NEPA Project Manager HDR 3200 E. Camelback Road, Suite 350 Phoenix, AZ 85018 D 602.474.3913 C 480.323.0298 Jouis.maslyk@hdrinc.com hdrinc.com/follow-us

Beverly Chenausky

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Sent:	Friday, September 16, 2016 1:29 PM
To:	'Maslyk, Louis'; Joonwon Joo; 'Wamsley.Jerry@epa.gov'; 'OConnor.Karina@epa.gov'; 'berry.laura@epa.gov'; 'mejia.marina@azdeq.gov'; 'meek.clifton@epa.gov'; Ed Stillings; 'Templeton.Ryan@azdeq.gov'; 'Christopher Vertrees'; 'patulski.meg@epa.gov'; 'McKaughan.Colleen@epa.gov': 'Lucke-McDowell.Catherine@azdeg.gov':
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Subject:	RE: H8045 SR 189 Air Quality Discussion
Attachments:	Nogales Agenda May 25th.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

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Lou Maslyk, AICP Senior NEPA Project Manager HDR 3200 E. Camelback Road, Suite 350 Phoenix, AZ 85018 D 602.474.3913 C 480.323.0298 Jouis.maslyk@hdrinc.com hdrinc.com/follow-us

Beverly Chenausky

From:	Beverly Chenausky
Sent:	Wednesday, April 13, 2016 8:58 AM
То:	Jerry Wamsley; Marina Mejia
Cc:	Clifton Meek; Karina O'Conner; Marinela Konomi; Tremaine Wilson; Sharon Gordon;
	Carlos Lopez; Ed Stillings; Joonwon Joo; 'Ryan C. Templeton'; Chris Vertrees
Subject:	Interagency Consultation: Determining Project of Air Quality Concern in SEAGO Region
	STP-189-A(201)T / 189 SC 000 H8045 01L
Attachments:	H8045_SR_189_Project_Level_PM_Questionnaire_Consultation.pdf; SR 189
	RCA_ScopeSummary_Consulation_4-13-16.docx
Follow Up Flag:	Follow up
Flag Status:	Flagged

To Interested Parties:

ADOT is presenting the following project, **SR 189, International Border to Grand Avenue,** for interagency consultation per 40 CFR 93.105 as a potential project that is not a project of Air Quality Concern and thereby will not require a PM10 hot-spot analysis. If through interagency consultation it is determined that this project will not require a hot-spot analysis, other conformity provisions apply and will be addressed in the air quality analysis that will be submitted to FHWA. ADOT is requesting responses to the attached questionnaire within **10 business days**; a non-response will be interpreted as concurrence that the project is not a project of air quality concern and does not require a hot-spot analysis. If any consulted party believes this project should be treated as a project of air quality concern that requires a Quantitative PM hot-spot analysis, please document the appropriate section under 40 CFR 93.123 (b) that applies to the project and describe why the project should be treated as a project of air quality concern.

While this project may not require a quantitative hot-spot analysis, as a regionally significant project in an isolated rural PM10 and PM2.5 nonattainment area this project needs to be included in a regional conformity analysis prior to project approval, per

40 CFR 93.121(b). Attached a summary of expected work tasks necessary to develop the regional conformity analysis for the Nogales nonattainment area(s). This document describes a general approach to the regional conformity analysis from initial discussions with ADEQ on February 22, 2016. A separate email will be sent out for further consultation on the regional conformity models, methods and assumptions that will be used in the regional analysis as part of "Task 1: Interagency Consultation and Data Collection". Please let me know if you have any additional questions or concerns on the suggested approach for the regional conformity analysis.

Thank you,

Beverly T. Chenausky Air & Noise Programs MD EM04, Room 41 1611 W. Jackson St. Phoenix, AZ 85007 602.712.6269 azdot.gov