



**APPENDIX J
SUMMARY OF COMMENTS**



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Agency / ADOT Section	Reviewer	#	Page/ Sec. No.	Code	Comment	Response	
ADOT Pav't Design	Jim Demaree				No comments on the Initial Feasibility Report. For the DCR use the following pavement sections: 1. Mainline I-10, General Purpose Lanes = 4" AC(Base), 14" Dowelled PCCP & 1" AR-ACFC. 2. Ramps and Cross Roads Urban = 4" AB and 12" Plain PCCP. Rural = 4" AB and 10" Plain PCCP. 3. SR 210, Mainline =4" AB, 12" Plain PCCP and 1" AR-ACFC. Ramps and Cross Roads = 4" AB and 10" Plain PCCP. 4. Frontage Roads 4" AB and 10" Plain PCCP or 4" AB and 5" AC. 5. Where feasible the existing in-place AC may be used as the AC(Base). 6. For now consider total reconstruction and during design the PCCP between I-19 and Houghton will be evaluated to remain if need be. If you have comments, need additional pavement sections or information please let us know.		The pavement sections provided by ADOT Materials Pavement Design will be utilized in the DCR.
ADOT Pav't Design	Ashek Rana				No comment.		
ADOT Safford Dist.	Bill Harmon, Dist. Engr.				I have no comments on this draft document.		
ADOT Safford District	Tom Engel				This Initial Feasibility Report does not affect any roadways in the Safford District so the District will have no comments on the IFR.		
ADOT Tucson District - EPG	William Knight	1	App G, Page 18 of Env. Overview	A	Table 1 – The column "Occupied Habitat Present?" should be marked Yes instead of No for the Pima pineapple cactus. There are pima pineapple cactus located in the right-of-way within the study limits.	Table 1 will be modified to reflect the presence of pima pineapple cactus.	
ADOT Bridge Group		1	Page. 5, Table 1.2	A	Please change structure #2197 Br. Rdwy Width to 125.8'. Structure #1226 Br. Rdwy Width to 38'. Structure #s 1044, 1045 and 1052 Spans/Str. Length to 4/96. On Structure #1052 please also change Br. Rdwy. Width to 24'. Structure #595 change Br. Rdwy. Width to 38.2'.	Structure dimensions will be revised	
		2		A	Structure #2599 is off the mainline but is considered an I-10 bridge that falls between the project mileposts. Please include in the table.	Structure # 2599 will be included in the table.	
ADOT Rdwy. Engr. Group, Des. Support	William Lyons	1	Page. 4, Sec. 1.3.1	A	Add existing roadway slope for tangent sections of roadway.	Cross-slope of I-10 mainline will be shown as it appears on as-builts.	
		2	Page. 19	A	Remove the * footnote on page 19 as it does not occur in the table on this page.	The * will be removed from notes for Table 2.3 on page 19.	
		3	Page. 21	A	Remove all footnotes under the partial table at the top of page 21. None of the footnotes apply to the partial table.	Will remove footnotes.	
		4	Page. 35	A	At the end of the sentences describing the one-lane directional ramps, add reference to the statement on page 13 of this report under <i>Future Roadway/Interchange Configuration</i> regarding compliance with the requirements of the RDG during the Design Concept phase.	Will add reference to Future Roadway/Interchange Configuration on page 13 of this report.	
		5	Page. 37	A	Under the section for I-10/Houghton Road TI, change "The major traffic movements at the interchange are:" to read "Recommended improvements at the interchange are:"	The text will be revised.	
		6	Page 39	A	Design Speed: Clarify that the design speeds provided for ramps are for service TI ramps. Add design speed at exit ramp gore (60 mph) and entrance ramp gore (55 mph).	The text will be revised in accordance with Section 503.3 of the RDG.	
		7	Page 39	A	Design Speed: Per RDG 503.3, 40 mph is the minimum design speed for a crossroad at a TI. The crossroad design speed should not be less than that of the crossroad approaches to the interchange. Clarify.	The text will be clarified to state that where the design speed of crossroads through the interchange is greater than 40 mph the higher design speed will be continued through the interchange.	

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ADOT Rdwy. Engr. Group, Des. Support (continued)	William Lyons (continued)	8	Page 39	A	Design Speed: Add design speed requirements for system TI ramps at exit gore area (65 mph), ramp body (55 mph) and entrance gore area (55 mph).	The text will be revised in accordance with Section 503.3 of the RDG.
		9	Page 39	A	Ramp Type: Add requirement that all ramps shall be parallel type. Entrance ramps (except system interchange directional ramps) dual-lane metering of traffic onto the mainline.	The text will be revised.
		10	Page 39	A	Pavement Cross Slope: If reconstructing pavement, I recommend that 2% cross slope be used for tangent sections of roadway.	Agree. This complies with the RDG
		11	Page 39	A	1-Lane Directional Ramps: Add reference to the statement on page 13 of this report under <i>Future Roadway/interchange Configuration</i> regarding compliance with the requirements of the RDG during the DCR phase.	Reference will be added.
		12	Page 39	A	Interchange Crossroads: Clarify that median curb adjacent to thru-lanes will also include a 2-foot setback from the lane edge.	Will revise text to include 2-foot setback from edge of thru-lane to median curb.
		13	Page 39	A	Interchange Crossroads: I disagree with the first paragraph of the last column on page 39. Within the ADOT right-of-way at the interchange, the raised median width will be per RDG Chapter 500.	The wording will be modified to add a statement that median width within the interchange will provide for turning movements as shown in RDG Chapter 500.
		14	Page 39	A	Slope Criteria: The traffic interchanges for the design year are either in urban or fringe-urban locations. Use ramp slopes per Figure 504.4A (not 505.4B).	Will use ramp slopes per Figure 504.4A. However, east of Houghton Rd. the character becomes less urban, with large spacing between interchanges. I-10 could be designed without curbs and slopes would be in accordance with the second paragraph of Section 504.4 of the RDG. This will be determined during the DCR phase.
		15	Page 39	A	Maximum Degree of Curve: Clarify conditions for which D_c value applies (i.e. ramp type – service ramp or system ramp; and location along ramp – gore area or body of ramp).	Text under both Design Speed and Maximum Degree of Curve will be revised to differentiate between service ramps and system ramps. Circular curves will be used for ramps. - Service ramps: Body of ramp – design speed 50 mph. Max. degree of curve - 6° 53' Parallel exit ramp – design speed 60 mph. Max. degree of curve - 4° 18' Parallel entr. ramp - design speed 55 mph. Max. degree of curve - 5° 24' - System ramps: Body of ramp including first curve at entrance – design speed 55 mph. Max. degree of curve - 5° 24' First curve @ exit – design speed 65 mph. Max. degree of curve - 3° 27'
		16	Page 39	A	Access Control: Consider clarifying intent by revising first bullet to read, <i>The limits of access control managed by ADOT</i> at interchange crossroads will be in accordance with Section 506 of the ADOT RDG.	The wording will be revised to reflect that ADOT access control will be applied to limits of roadways managed by ADOT.
		17	Pg. 40, 41 Sec. 4.2.3	C	Horizontal and Vertical Alignments: Consider revising the text of the second paragraph in this section. IFR Section 4.2.11 suggests the possibility of total pavement reconstruction. Total reconstruction of the existing roadway must meet RDG requirements. The decision of whether to retain the existing pavement and match the existing vertical profile or to construct new pavement and engineer a new control for vertical profile may best be made during the Design Phase. Factors impacting a profile grade control decision include: <ul style="list-style-type: none"> Existing pavement and subgrade condition; Whether existing profile geometry is substandard when compared with present day design criteria; Pavement overtopping concerns at cross drainage locations; Minimum clearance below subgrade for culvert extensions when widening roadway to the outside; and Vertical clearance requirements at crossroad and railroad structures. 	Comments from ADOT Pavement Design assume total pavement reconstruction with the possible exception of the existing PCCP between I-19 and Houghton. See comments by Jim Demaree.

Agency / ADOT Section	Reviewer	#	Page/ Sec. No.	Code	Comment	Response
ADOT Rdwy. Engr. Group, Des. Support (continued)	William Lyons (continued)	18	Page 41 Sec. 4.2.14	A	4.2.14 Design Exceptions: If the existing horizontal and vertical alignment of I-10 eastbound and westbound mainlines will be retained (as stated in section 4.2.3), include the analysis report for the controlling design criteria.	Section 4.2.3 will be modified to indicate that the Analysis Report will include retained portions of both the vertical and horizontal alignments. Section 4.2.14 will be modified to state the Analysis Report will be included in the AASHTO Controlling Design Criteria Report.
		19	81 thru 95 121 thru 138	A	Add pavement cross slope.	Pavement cross slope will be added to the typical sections during the Design Concept Phase of the project.
		20	84 & 124	D	On the left side of the typical section, the width of the 12-ft. ramp shown adjacent to the gore should be 14 ft. for an exit ramp and will actually vary for an entrance ramp per RDG Figures 504.8A and 504.8B.	Within the limits of the gore, which is where this typical section is shown, the lane is 12-ft. and the additional 2-ft. is within the width of the gore.
		21	90 & 130	A	On the left side of the typical section, the 2-ft. offset from the frontage road lane to the face-of-barrier is correct if the barrier is following the curb line of the frontage road curb. For a ramp, the 2-ft. offset from the 12 ft. lane is incorrect. The offset should include the 2-ft. shy distance per Design Memo dated 8/18/05.	The typical section for frontage roads or ramps with barriers will be modified during the Design Concept Phase of the project.
Pima County Dept. of Transportation & Pima County Dept. of Administration.	Priscilla S. Cornelio, Dept. of Transportation & C. H. Huckelberry, Dept. of Administration	1		C	<p><i>Following are excerpts from a letter from Pima County to ADOT (Billah Khan) dated Dec. 6, 2011. The entire letter along with the following letters are attached to this summary of comments:</i></p> <p><i>A letter from C. H. Huckelberry, Pima County Administrator to John Halikowski, ADOT Director dated Nov. 2, 2011.</i></p> <p><i>A letter from John Halikowski, ADOT, to C. H. Huckelberry, Pima County, dated Nov. 16, 2011.</i></p> <p>-----</p> <p>Pima County Department of Transportation is concerned with the decision to eliminate from consideration any further study of a SR 210 connection at Wilmot Road – System Alternative III (including IIIa and IIIb). The department believes that this decision is premature.</p> <p>A SR 210 connection to I-10 at Wilmot Road would provide significant relief to I-10 and would seem to function at least as well as the proposed connection at Valencia Road. The report notes some geometrical challenges for the Wilmot alignment but the analysis was cursory at best and it would seem that these issues can be analyzed in more detail. It would also be helpful to have a detailed cost estimate prepared so that the Wilmot alignment can be fully compared with the System I and System II alternatives on an impartial basis.</p> <p>In the Feasibility Report, much was made of the possible problems with the Wilmot alignment due to conflicts with DMAFB and the high level of scrutiny and approval that would be required. However, there is no evidence that DMAFB officials were contacted to ascertain whether severe constraints do in fact exist, and if they do, whether they can be mitigated. Please be aware that Pima County stands ready to meet with you and DMAFB representatives to resolve and design issues that may arise.</p> <p>Pima County has recently embarked on a regional planning effort related to economic development and the transportation infrastructure necessary to support that development in the southeast area of the Tucson region. These studies envision Wilmot Road south of I-10 and extending north of I-10 along the southern boundary of DMAFB as becoming a major transportation corridor in the region to enhance economic opportunities and viability for the area.</p> <p>For these reasons, we believe that the decision to eliminate the Wilmot alternative from further consideration was premature and not in the best interest of the Tucson region. We are requesting your reconsideration and inclusion of the SR 210 Wilmot connection to I-10 as an alternative in the upcoming DCR study and report, and environmental assessment as a fully considered alternative along with System Alternative I and System Alternative II.</p>	<p>The Final Feasibility Report will document the elimination of System Alternatives III, IIIa and IIIb as stated in the response to comments from the DMAFB on page 10 of this Summary of Comments.</p> <p>The County was asked to identify other alternatives for the connection of the extension of SR 210 to Wilmot Road. If such alternatives are identified, they will be evaluated in detail along with System Alternatives I and II in the Design Concept phase of the project.</p> <p>The environmental impacts of the alternatives will be addressed in detail during the Design Concept phase and will be part of the decision making process for selection of the alternative to be carried forward.</p> <p>A copy of a submittal of System Alternative IIIc, to Robert Young, Pima County DOT, on April 5, 2012, was also submitted to Priscilla Cornelio. See comments from Robert Young and response to his comments on Pages 8 and 9 of this Summary of Comments.</p>
Pima County DOT	Damon Ballesteros				No response	
Pima County DOT	Ben Goff				No response	

Summary of Comments
Initial Feasibility Report
Project No.: 010 PM 260 H7825 01L
Federal No.: 010-E(210)A
Interstate 10: Jct. Interstate 19 to State Route 83
Tucson – Benson Highway
State Route 210: Golf Links Road to I-10
Barraza – Aviation Parkway

CODE
A Will Comply
B Consultant/Designer to Evaluate
C ADOT Team to Evaluate
D Study Team Recommends No Further Action

July 2012

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Pima County DOT	Robert Young	1		C	On April 10, 2012 Robert Young responded to Brad Olbert's submittal of April 5, 2012, relative the System Alternative IIIc. Mr. Young's response stated that he forwarded the alternative to County management and they are pleased that we have an alignment that connects to Wilmot that is apparently feasible with no major flaws. Mr. Young requested that the System Alternative IIIc alignment be forwarded to Davis-Monthan officials for the review, and if they concur, that this alternative be advanced into the next phase of the study to be considered along with alternatives I and II.	On April 5, 2012 Brad Olbert submitted System Alternative IIIc to Pima County for review and comment. (See attached Exhibit of System Alternative IIIc) On April 11, 2012 Brad Olbert submitted System Alternative IIIc to James Barker, DMAFB, for comment and response. See comments from DMAFB and responses to their comments on pages 10, 11 and 12 of this Summary of Comments.
Pima County DOA	John Bernal				No response	
Pima County Regional Flood Control	Bill Zimmerman				No response	
Pima County Regional Flood Control	Leo Smith				No response	
Pima Association of Governments Pima Association of Governments	Gary G. Hayes, Executive Director Gary G. Hayes, Executive Director	1		C	<i>Following are excerpts from a letter from Gary G. Hayes, PAG to Eileen Collieran, ADOT Government Relations and Policy Development, dated Dec. 8, 2011. The entire letter is attached to this Summary of Comments.</i> ----- Your letter suggested that Pima County work with PAG to ensure support of the County's request to retain Wilmot Road as a feasible alternative in the ADOT Study. The County's request is consistent with the findings of PAG's adopted southeast Area Arterial Study which identified the Wilmot Road corridor south of Interstate 10 as a critical need for north-south traffic movement in the area as well as the likely location of a limited access parkway facility that links to Interstate 19. The study indicated that further study was needed to determine an ultimate corridor alignment. PAG agrees that not including Wilmot in the current ADOT study as a feasible alternative could prejudice future study and implementation of this critical corridor. We join in the County's request that the Wilmot alternative be maintained and explored in greater detail at this time rather than in a future Design Concept Report.	See response to DMAFB on page 10 of this Summary of Comments and to Pima County Dept. of Transportation on page 7 of this Summary of Comments.
Pima Assoc. of Gov.	Cherie Campbell				No response	
Pima Assoc. of Gov.	Jim DeGrood				No response	
Pima Assoc. of Gov.	Don Freeman				No response	
Pima Assoc. of Gov.	John Liosatos				No response	
Pima Assoc. of Gov.	Aichong Sun				No response	
Pima Assoc. of Gov.	Richard Nassi				No response	
Davis-Monthan AFB	James B. Barker, P.E., Deputy Base Civil Engr., (Kenneth Born, Darren Horstmeier)	1		C	<i>Following is a brief summary of comments from Davis Monthan AFB to ADOT (Billah Khan) relative to the proposed improvement of I-10 and the extension of SR 210 as presented in the Initial Feasibility Report. Due to the sensitive nature of certain comments provided by Davis-Monthan, their staff requested some statements be removed from this Summary of Comments.</i> ----- Davis Monthan AFB has constraints relative to clearances which must be maintained to maintain the viability of the AFB for future operations. The AFB is willing to work with ADOT and with Pima County DOT to reach acceptable alternatives for the highway improvements. The constraints can be discussed and analyzed by the various stakeholders to develop acceptable alternatives.	The concerns of Davis Monthan AFB were discussed in detail in a meeting held at the ADOT Tucson District Office, March 14, 2012. Attendees included representatives from Pima County DOT, City of Tucson and PAG in addition to ADOT and Davis Monthan AFB It was determined that System Alternatives IIIa and IIIb are not feasible because of constraints imposed by DMAFB and limitations for location of these alternatives outside the limits of the DMAFB constraints. The Final Feasibility Report

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Davis-Monthan AFB (continued)	James B. Barker, P.E., Deputy Base Civil Engr.; (Kenneth Born, Darren Horstmeier) (continued)	1 cont				<p>will document the elimination of System Alternatives IIIa and IIIb from consideration and they will not be carried forward into the Design Concept phase of the project.</p> <p>Discussions of the viability of System Alternative III centered on the alignment of the roadway passing through the Thomas Jay Regional Park. The alignment being considered would eliminate a portion of the park located between the UPRR and the Julian Wash. If Federal funding is used it would be necessary to obtain approval of a Section 4f environmental impact to the park. Since other alternatives to the extension of SR 210 have been identified that would not impact the park or other 4f properties, it would not be possible to obtain approval of using the park property. In addition, it is unlikely the County would agree to use of the park property for highway right-of-way. Therefore, it was agreed that the Final Feasibility Report will document the elimination of System Alternative III from consideration and it will not be carried forward into the Design Concept phase of the project. The Pima County DOT was asked to identify additional alternatives that would connect the SR 210 extension to Wilmot Road. System Alternative IIIc was identified and will be evaluated in detail along with System Alternatives I and II in the Design Concept phase of the project.</p> <p>DMAFB expressed concern with roadway alternatives along the south side of the base. Discussion with the DMAFB representatives at the meeting indicated that this concern could be mitigated by such features as sound walls that are high enough to provide protection. Only System Alternatives II and IIIc are affected by this concern. This will be studied during the Design Concept phase.</p> <p>On April 11, 2012 Brad Olbert, Jacobs, submitted System Alternative IIIc to DMAFB for their review. (See attached Exhibit of System Alternative IIIc)</p>
		2		C	<p>James B. Barker sent a letter dated May 23, 2012, to Billah Khan, ADOT Project Manager, responding to the submittal of System Alternative IIIc sent to him April 11, 2012. The text of the letter and the accompanying comments follow. Due to the sensitive nature of certain comments provided by Davis-Monthan, their staff requested some statements be removed from this Summary of Comments.</p> <p>Thank you for the opportunity to provide some additional comments on the I-10, Jct. I-19 to SR 83 Initial Feasibility Report. These comments are specific to the proposed System Alternative IIIc for the Barraza-Aviation Parkway/SR 210 extension plan, provided to us via e-mail on 11 April 2012 by Brad Olbert with Jacobs Engineering and are in addition to our previous comments.</p> <p>Davis-Monthan AFB staff would like to continue to express our support and preference for Alternative I as the process moves forward. This alignment would have the least amount of direct impacts to the installation/mission when compared to other alternatives proposed as part of the Feasibility Report. However, we understand there is a desire to have an alternative that provides a connection to the Wilmot I-10 interchange. Our review of Alternative IIIc is attached and there are some concerns that would have to be overcome. If this alternative is selected for further consideration, we would be willing to talk about potential in kind considerations for the loss of use of the land. At that point we would also have to work closely with you to ensure any elevation and final location of the roadway did not violate our airfield criteria.</p> <p>If you have any questions, please contact my POC, Mr. Ken Born. He can be reached at 520-228-6098 or Kenneth.born@dm.af.mil</p> <p>Review comments for I-10, Jct I-19 to SR 83 – Initial Feasibility Report Alternative IIIc</p>	<p>The comments relative to the feasibility of System Alternative IIIc for further study are noted. Since the comments from Davis-Monthan AFB do not indicate that this alternative violates constraints identified by the representatives of Davis-Monthan, that would make the alternative unacceptable, System Alternative IIIc will be included in the Final Feasibility Study as an alternative to be carried forward into the Phase II Design Concept Study, along with System Alternative I and System Alternative II. Concerns noted in the comments will be studied in the Design Concept phase. There will be opportunities for all participants in the study process to express concerns and recommendations.</p>

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Davis-Monthan AFB (continued)	James B. Barker, P.E., Deputy Base Civil Engr.; (Kenneth Born, Darren Horstmeier) (continued)	3		C	<p>1. Alternative IIC would cut through a decommissioned military training area located south of the Davis-Monthan AFB runway, which is land subject to the Department of Defense's (DoD's) Military Munitions Response Program (MMRP). These sites were illustrated on the constraints map provided to the project team during our 14 Mar 12 meeting, and are better defined in the map attached alongside these comments.</p> <p>In addition to unexploded ordnance, munitions constituents associated with these MMRP sites include metals (antimony, arsenic, barium, iron, copper, lead, zinc, aluminum, magnesium, nickel, potassium, and titanium), and semivolatile organic compounds (SVOCs) (including hexachloroethane).</p> <p>D-M's environmental Restoration Manager has indicated that Draft Record of Decisions (RODs) are being developed by the U.S. Army Corps of Engineers to determine and document these sites as closed (i.e. Training Area 2, TM552; Wilmot Target Range, TM553). The RODs are expected to be completed no later than 31 Oct. 12. The risk associated with leaving the contamination in place is low; however, if construction activities were to occur in these areas, crews should be briefed on emergency procedures in the unlikely event that they run across any unexploded munitions.</p>	
		4		C	<p>2. The land south of the DMAFB runway described above is also owned by the Bureau of Land Management (BLM), and leased in support of the Air Force mission. Therefore, use of this land in association with the SR 210 extension will first require authorization from the BLM and Department of Interior. The land area owned by the BLM is illustrated on the map attached herein.</p>	
		5		C	<p>Alternatives II, III, and IIIA_C</p> <p>3. Alternatives II, III, and IIIA-C would potentially cut through a site subject to the DoD's Installation Restoration Program (IRP) along the westerly boundary of DMAFB. This site was illustrated on the constraints map provided to the project team during our 14 Mar 12 meeting, and is better defined in the map attached along with these comments.</p> <p>The IRP site is an area where debris such as drums, auto parts, and metal waste are present from unauthorized dumping (i.e. Drums Piles, OT-39). Drums were removed from the site in 1987, and remediation of the site was completed by excavation and solidification. Contaminants of concern consisted of metals in soils. D-M's Environmental Restoration Manager has indicated that a Draft ROD is being developed to determine and document this site as a no further action site closure, expected to be completed no later than 30 Sep 12. The risk associated with leaving remaining contaminants in place is very low, as levels of metals in soils are at background levels and less than soil remediation levels.</p>	
		6		C	<p>4. The Feasibility Study does not provide an estimate on how tall an overpass at Valencia Road, required in support of Alternatives II, III, and IIIA-C, would be above ground level. This is problematic in that we are unable to assess consistency with airfield criteria per our regulatory guidance documents.</p>	
		7		C	<p>5. For Alternatives II, III, and IIIA-C, from a security perspective, there is concern that a high volume of traffic in close proximity to the base boundary could provide greater opportunities for terrorist surveillance and targeting. Therefore, a roadbed depressed below-grade, or incorporating physical barriers such as sound walls or artificial berms into the roadway design would be required. Any walls would have an impact on the surfaces referred to in the next comment.</p>	
		8		C	<p>6. Alternatives II, III, and IIIA_C would traverse through the runway Approach-Departure Clearance Surface (50:1) and a Transitional Surface (7:1). These surfaces restrict the height that any object can be relative to the nearest runway elevation point. However, even if the vertical profile allowing crossover at Valencia Road was under the vertical</p>	

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Davis-Monthan AFB (continued)	James B. Barker, P.E., Deputy Base Civil Engr.; (Kenneth Born, Darren Horstmeier) (continued)	8 con't.			height restrictions, its elevation relative to the runway and other sensitive assets at DMAFB presents the same security concerns noted above.	
ADOT Env. Planning	Thor Anderson				No response	
ADOT Env. Planning	Fred Garcia				No response	
ADOT Roadside Dev.	LeRoy Brady				No response	
ADOT Pav't. Design	Paul Burch				No response	
ADOT Traffic Design	Dana Chamberlin				No response	
ADOT RAW Admin.	John Eckhardt III				No response	
ADOT Deputy State Engineer	Dallas Hammit				No response	
ADOT Drainage Sec.	Shajed Haque				No response	
ADOT Contr. & Specs.	Steve Hull				No response	
ADOT Plan. and Prog.	Michael Kies				No response	
ADOT	M Kinter				No response	
ADOT Prog. & Proj. Mgmt	Hari Khanna				No response	
ADOT Statewide Proj. Mgmt.	Vincent Li				No response	
ADOT Prior. Prog. Sec.	Debbie Mayfield				No response	
ADOT RAW Proj. Mgmt.	Pete Mayne				No response	
ADOT	Mark Poppe				No response	
ADOT Traffic Design	Karim Rashid				No response	
ADOT Public Involvement	Gricel Sato				No response	
ADOT Util. & RR Engr.	Robert Travis				No response	
ADOT CCP	Teresa Welborn				No response	
ADOT CCP	Paki Rico				No response	
ADOT	Karen Williams				No response	
ADOT Mat. – Geotech Des.	James Wilson				No comments.	
ADOT Bridge Design	Pe-Shen Yang				No response	
ADOT Bridge Design	William Downes	1	Pg.5, table 1.2	A	Please change structure # 2197 Br. Rdwy Width to 123.8'. Structure # 1226 Br. Rdwy Width to 38'. Structure #s 1044, 1045 and 1052 Spans/Str. Length to 4/96. On Structure # 1052 please also change Br. Rdwy Width to 24'. Structure 595 change Br. Rdwy Width to 38.2'.	The changes to structure #s 2197, 1226, 1044, 1045 and 1052 in Table 1.2 have been made.
		2	Pg.5, table 1.2	A	Structure 2599 is off the mainline but is considered an I-10 bridge that falls between the project mileposts. Please include in the table.	Structure # 2599 is included in Table 1.2.
ADOT MPD Systems Plan.	James Zumpf				No response	
ADOT Design Support	Lev Derzhavets				No response	
ADOT Statewide Proj Mgmt.	Robin Raine	1	Exec. Sum. pg. ii & pg. 31 of report	A	Please name the park, elementary school, and middle school affected by System Alternative III.	Names will be added.
ADOT Aeronautics	Michael Klein				No response	
ADOT Aeronautics	Kenneth Potts				No response	
ADOT MPD Programming	Ungyo Sugiyama				No response	
ADOT Tucson Dist.	Todd Emery, Dist. Engr.				No response	

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Tucson – Benson Highway
State Route 210: Golf Links Road to I-10
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ADOT Tucson Dist.	Jerry James, Asst. Dist. Engr.				No response	
ADOT Tucson Dist.	Mick Hont, Asst. Dist. Engr. Ops.				No response	
ADOT Tucson Dist.	Ayman Ghadban, Util. Coord.				No response	
ADOT Tucson District	William Denton, Reg. Tr. Engr.				No response	
ADOT Tucson Dist.	Delores Crumbacher				No response	
ADOT Tucson Dist.	Shafiqul Islam				No response	
ADOT Tucson Dist.	Daniel Granillo				No response	
ADOT Tucson Dist.	Tom Martinez				No response	
ADOT Tucson Dist.	Linda Ritter, CCP				No comment.	
ADOT Tucson Dist.	Angela Roach	1		A	<p>There's a large archaeological site called the "Julian Wash Site" located in/near the I-10/I-19 interchange. I am under the impression that ADOT has some agreement with SHPO (and/or the tribes) as to how we are to protect this site. Could we confirm with environmental staff at Jacobs/EcoPlan that the plans for this TI are not in conflict with this site and the agreement?</p> <p>I have no other comments or concerns.</p>	A determination of conflict/no conflict will be made and documented in the Environmental Assessment and the DCR.
ADOT Safford Dist.	C. T. Revere, Pub. Info.				No response	
ADOT Safford Dist.	Joe Schwer				No response	
AZ Game & Fish Dept.	Ray Schweinsburg				No response	
AZ Game & Fish Dept.	Scott Spragne				No response	
AZ Game & Fish Dept.	John Windes				No response	
AZ State Land Dept.	Ruben Ojeda				No response	
US Customs & Border Protection	Elizabeth Briones				No response	
US CBP	Jeff Tanner				No response	
City of Benson	Brad Hamilton				No response	
City of South Tucson	Richard Salaz				No response	
City of South Tucson	Joel Gastelum				No response	
City of South Tucson	Mick Jensen				No response	
City of Tucson	Jim Glock				No response	
City of Tucson	Mary Collins				No response	
City of Tucson	Andy McGovern				No response	
City of Tucson	Jose Ortiz				No response	
Cochise County	Karen Lambertson				No response	
FHWA	Ken Davis				No response	
FHWA	Aryan Lirange				No response	
FHWA	Meesa Otani				No response	
SEAGO	Randy Heiss				No response	
Sun Tran	Robert McGee				No response	
Sun Tran	Mary McLain				No response	
Tucson Airport Authority	Jordan Field				No response	
UPRR	Alex Popovic				No response	



PIMA COUNTY
DEPARTMENT OF TRANSPORTATION
201 NORTH STONE AVENUE, FOURTH FLOOR
TUCSON, ARIZONA 85701-1207



PRISCILLA S. CORNELIO, P. E.
DIRECTOR

(520) 740-6410
FAX (520) 740-6439

December 6, 2011

Billah Khan
Project Manager
Arizona Department of Transportation
205 South 17th Avenue, MD 050P
Phoenix, Arizona 85007

**Subject: Interstate 10/Junction Interstate 19 to State Route 83 and State Route 210,
Golf Links Road to Interstate 10**

Dear Mr. Khan:

Pima County Department of Transportation has reviewed the Initial Feasibility Report and Environmental Overview for the referenced project and especially the State Route (SR) 210 portion of the project. Overall, the report is very thorough and complete; however, we are concerned with the decision to eliminate from consideration any further study of a SR 210 connection at Wilmot Road - System Alternative III (including IIIa and IIIb). The department believes that this decision is premature.

As your Traffic Study indicates, a SR 210 connection to Interstate 10 (I-10) at Wilmot Road would provide significant relief to I-10 and would seem to function as least as well as the proposed connection at Valencia Road. The report notes some geometrical challenges for the Wilmot alignment but the analysis was cursory at best and it would seem that these issues would be better addressed in the Design Concept Report (DCR) where the specific design issues can be analyzed in more detail. It would also be helpful to have a detailed cost estimate prepared so that the Wilmot alignment can be fully compared with the System I and System II alternatives on an impartial basis.

Also in the Feasibility Report, much was made of the possible problems with the Wilmot alignment due to conflicts with Davis-Monthan Air Force Base (DMAFB) and the high level of scrutiny and approval that would be required. However, there is no evidence that DMAFB officials were ever contacted to ascertain whether severe constraints do in fact exist, and if they do, whether they can be mitigated. We know from our own past experience in working with the DMAFB on the construction of Kolb Road through the air base and Golf Links Road across the northern edge of the base the types of security and design issues that can arise but we are also aware that many of these seemingly intractable issues can be resolved by open discussion with DMAFB officials. Please be aware that Pima County stands ready to meet with you and DMAFB representatives to resolve any design issues that may arise.

**Billah Khan, Project Manager, Arizona Department of Transportation
Interstate 10/Junction Interstate 19 to State Route 83 and State Route 210, Golf Links Road to
Interstate 10
December 6, 2011
Page 2**

In addition, Pima County has recently embarked on a regional planning effort related to economic development and the transportation infrastructure necessary to support that development in the southeast area of the Tucson region. These studies envision Wilmot Road south of I-10 and extending north of I-10 along the southern boundary of DMAFB as becoming a major transportation corridor in the region to enhance economic opportunities and viability for the area. It should be noted that other portions of the I-10 study support this planning concept by proposing to close the Palo Verde interchange and construct a new interchange at Country Club Road to provide enhanced access to the airport.

For these reasons, we believe that the decision to eliminate the Wilmot alternative from further consideration was premature and not in the best interest of the Tucson region. We are requesting your reconsideration and inclusion of the SR 210 Wilmot connection to I-10 as an alternative in the upcoming DCR study and report, and environmental assessment as a fully considered alternative along with System Alternative I and System Alternative II.

Please contact me if you have any questions.

Sincerely,

Priscilla S. Cornelio, P.E.
Director

PSC:sap

c: C.H. Huckelberry, County Administrator
John M. Bernal, Deputy County Administrator, Public Works



COUNTY ADMINISTRATOR'S OFFICE

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

C.H. HUCKELBERRY
County Administrator

November 2, 2011

John Halikowski, Director
Arizona Department of Transportation
206 South 17th Avenue
Phoenix, Arizona 85007-3213

Re: Interstate 10/Barraza-Aviation Parkway (State Route 210) Corridor Studies

Dear Mr. Halikowski:

Pima County is aware of ongoing evaluations for determining the long-range improvements to be programmed for the Interstate 10 (I-10) corridor from Interstate 19 east and the State Route (SR) 210 extension from Alvernon Way to I-10. These are major transportation routes in the Pima County region and are vitally important to our long-term economic wellbeing.

Pima County, along with the other regional entities, is engaged in a major planning effort to enhance our opportunities for retaining existing employers and attracting new employers in the southern part of our region. Therefore, these ongoing corridor studies and determinations of future improvements for the I-10 corridor and SR 210 are of vital interest to us.

To assure our respective planning efforts are fully compatible, I suggest we provide you with information regarding our ongoing efforts. Ideally, we would prefer to meet with you and your staff to comprehensively present the process underway and to advise you of our perspective relative to the State Highway planning process currently underway.

We will contact your office regarding your availability in the near future to conduct these discussions. If you have any immediate questions, please contact me or Deputy County Administrator John Bernal at 520.740.8425.

Sincerely,

C.H. Huckelberry
County Administrator

CHH/mjk

c: Gary Hayes, Executive Director, Pima Association of Governments
John Bernal, Deputy County Administrator for Public Works
Priscilla Cornelio, Director, Department of Transportation



Janice K. Brewer
Governor

John S. Halikowski
Director

Arizona Department of Transportation

Office of the Director

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

November 16, 2011

John A. Bogert
Deputy Director
for Operations

Floyd Roehrich, Jr.
Deputy Director
for Policy

C.H. Huckelberry, County Administrator
Pima County
County Administrator's Office
Pima County Governmental Center
130 W. Congress, Tucson, Az. 85701-1317

Re: Interstate 10/Barraza-Aviation Parkway (State Route 210) Corridor Studies

Dear Mr. Huckelberry:

Thank you for your letter dated November 2, 2011 concerning Pima County's major planning effort to enhance existing and future employment opportunities and the link to transportation corridor planning by the Arizona Department of Transportation (ADOT). The Department appreciates the information you have provided related to these corridors, which appear to be within portions of Interstate 10 and State Route 210 currently under evaluation through our I-10 and SR 210 Feasibility Study (Project No. 010 PM 260 H782501L).

ADOT has actively engaged regional and local governmental agencies, including Pima County, while developing the Feasibility Study. A public information meeting was recently held for the project on October 6, 2011 at the Tucson North Airport Holiday Inn Hotel.

The Feasibility Study will be distributed for review within the next two weeks. I would suggest that after you and your staff has had an opportunity to review and comment on the report, that a meeting be scheduled with the project team to address your comments, concerns and discuss future planning actions.

We look forward to continuing to work with Pima County in planning economic and transportation needs important to the region.

Sincerely,

John S. Halikowski

cc: Jennifer Toth, State Engineer, ADOT
Scott Omer, Director of Multimodal Planning, ADOT
Dallas Hammit, Deputy State Engineer – Operations, ADOT
Gary Hayes, Executive Director, PAG
John Bernal, Deputy County Administrator for Public Works, Pima County
Priscilla Cornelio, Director of Transportation, Pima County



December 8, 2011

Ms. Eileen Colleran
Government Relations and Policy Development
Arizona Department of Transportation
206 South 17th Avenue
Phoenix, AZ 85007-3212

Re: ADOT Feasibility Study Associated with the Extension of State Route 210

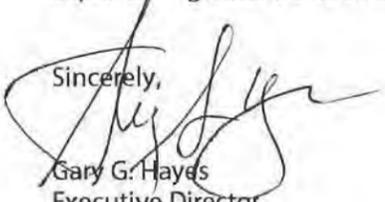
Dear Ms. Colleran:

PAG was copied on correspondence between you and Pima County Administrator C.H. Huckelberry regarding a current ADOT feasibility study associated with Interstate 10 and the extension of State Route 210. Your letter suggested that Pima County work with Pima Association of Governments (PAG) as the regional planning entity to ensure support of the County's request to retain Wilmot Road as a feasible alternative in the ADOT study.

The County's request is consistent with the findings of PAG's adopted Southeast Area Arterial Study which identified the Wilmot Road corridor south of Interstate 10 as a critical need for north-south traffic movement in the area as well as the likely location of a limited access parkway facility that links to Interstate 19. The study indicated that further study was needed to determine an ultimate corridor alignment.

PAG agrees with Mr. Huckelberry's concern that not including Wilmot in the current ADOT study as a feasible alternative could prejudice future study and implementation of this critical corridor. We join in the County's request that the Wilmot alternative be maintained and explored in greater detail at this time rather than in a future Design Concept Report (DCR).

Sincerely,


Gary G. Hayes
Executive Director

Cc: John S. Halikowski, ADOT Director
Jennifer Toth, ADOT State Engineer
C.H. Huckelberry, Pima County Administrator
John Bernal, Deputy Pima County Administrator for Public Works
Priscilla Cornellio, Director, Pima County Transportation
James DeGrood, Regional Transportation Authority

The following responses were received as a result of review of the Initial Feasibility Report Update dated December 2014. All recipients of the original Initial Feasibility Report dated October 2012 were provided the opportunity to review and comment on this Initial Feasibility Report Update.

Agency / ADOT Section	Reviewer	#	Page/ Sec. No.	Code	Comment	Response
ADOT Bridge Group	William F. Downes	1		B	Bridge Group has bridge rehabilitation projects scheduled for: the I-10/Kino Parkway TI, the I-10/Craycroft Road TI, and the I-10/Wilmot Road TI. Should upcoming projects be mentioned in the report?	The focus of this Feasibility Report was to get the traffic analyzed and identify alternatives to move forward with into the Design Concept Report (DCR) phase. Feasibility Reports typically are not as comprehensive as DCRs. In the DCR phase we will analyze the alternatives, get public and agency input, recommend the preferred alternative, and develop an implementation plan. The implementation plan is where the upcoming projects are important, to determine how all of the corridor projects fit together within the implementation plan.
ADOT Design Support Section	William Lyons				I have no comment to offer.	
ADOT Safford District	Bill Harmon, District Engineer				I have no comments.	
Pima County DOT Traffic Engineering Division	Seth Chalmers, Bill Strickler, Rob Lane	1	General	B	This project appears to be a capacity improvement project. What is the purpose of the crash analysis? If crashes are to be considered, recommend the alternatives be compared using the HSM SPF's for the increased traffic and lane configurations, then mitigate to below the state average. See if that additional cost impacts the alternative.	As is stated in Section 2.4 of the Feasibility Update, crash data is analyzed to identify operational issues and high crash areas along the existing roadways. The causes and severity of vehicular crashes will be addressed in determining appropriate design of roadway features during the Design Concept Study.
		2	Pg. 46	B	Design criteria – cross slope. The cross-slope is listed as 2% for 3 or more lanes. Where will the cross-slope be applied in the case of the 4-lane segments? Will the cross-slope be applied to reduce the depth of water on the roadway surface during a design flood event?	The ADOT Roadway Design Guidelines (RDG) will be followed for cross-slope criteria. Currently 2% is used for multiple lanes. The current RDG is silent on increasing cross-slopes for more than 4-lanes. ADOT Roadway Drainage will need to concur with using cross-slopes greater than 2% on tangent grades.
		3	Sec. 4.2.2	B	Recommend consideration of more undercrossings placed at approximate ½ mile spacing – between TI's to act as reliever roads for the arterials feeding into the freeway. Analyze the benefit of the reduction of traffic at the TI's.	If local agencies develop and adopt measures to implement crossing structures for ½ mile spaced roadways, the DCR will include references to the additional roadway crossings. The responsibility for implementing the additional roadway crossings and the cost to achieve them will have to be negotiated between ADOT and the responsible local agencies.
		4	Cost Est. General	B	Did not see a cost for the coordination of utilities work or reimbursement of eligible utility relocations. The relocation of utilities could impact project development timing, length of construction, right of way, as well as cost.	The cost of utility relocations is not included in the Feasibility Report Update, as stated on page 51 of the report. The DCR will address estimated utility costs.
		5	Cost Est. General	B	What does Indirect Cost Allocation (10.39%) cover? Could this item be reduced by having a local agency assume management of the project? The savings of up to \$50M for some alternatives would be significant.	The Indirect Cost Allocation (ICA) line item is ADOT's overhead. FHWA reimburses ADOT for ICA.
		6	Append. F	B	Craycroft: A signal has been proposed at Travel Plaza Way (formerly Elvira/Rex). Development has occurred in this area which impacts the access control strategy at this location.	The access control strategy at local road intersections that are impacted by the improvement of I-10 will be revisited and addressed in the DCR.
City of Tucson	Robin Raine	1	Sec. 2	B	If Alt. IV went to Houghton instead of Kolb, would that get rid of all LOS D areas on I-10 along the corridor?	The Design Year 2040 Level of Service (LOS) Summary for the Alt. IV mainline on page 22 of the report shows all of the mainline roadways have LOS C or better. On page 24 of the report the 2040 PM Peak Hour LOS for the EB Off-Ramp at Houghton Rd. shows LOS D. Since that is a ramp capacity issue it is doubtful that extending the Collector/Distributor concept to Houghton Rd. would improve that issue. LOS D indicates that the ramp will be operating at capacity which is acceptable. An additional lane may be needed on the ramp to improve the LOS in the future.
Pima County	Robert Young				As all three alternatives under consideration are being carried forward to Phase II, Design Concept Report and EA, Pima County has no comments on the updated feasibility report.	
Arizona Game and Fish Dept.	Kristin Terpening	1	General	C	Mike (Dawson, Ecoplan), to follow up on our phone conversation earlier this morning, Shawn and I have prepared text to draw attention to the critical need for wildlife linkage studies along I-10 for the current	The significance of wildlife linkage along public roadways is recognized. ADOT and Jacobs will coordinate with the Arizona Game and Fish Dept. during development of the DCR and

Agency / ADOT Section	Reviewer	#	Page/ Sec. No.	Code	Comment	Response
					<p>projects between I-19 and Benson. We understand ADOT and its consultants are currently requesting comments on the Initial Feasibility and Environmental Overview for I-10, Junction I-19 to SR 83 (H7825). It is our understanding that ADOT will this year be developing Design Concept Reports (DCRs) for both the I-19 to SR 83 and SR 83 to Benson segments. Therefore, we feel it is appropriate to address the need for wildlife connectivity throughout both segments, and provide the information below for incorporation into the Feasibility Report, Environmental Overview, and ensuing DCRs. We anticipate close collaboration with ADOT and its consultants throughout development of the DCRs and look forward to developing significant improvements to wildlife connectivity and permeability of I-10 in the project area. Please do not hesitate to contact either Shawn or me for any necessary clarification of the information below.</p> <p>Thank you, Kristin Terpening</p> <p>Issue statement Considerable research evidence has accumulated indicating the impact of highway rights-of-way on movement patterns of vertebrates. Roadways affect vertebrate populations through mortality (collisions with vehicles), presenting barriers to movement thereby limiting access to resources, fragmentation of habitats, and disruption of gene flow. Wildlife on roadways also poses a severe hazard to the motoring public, annually causing billions of dollars of damage, injuries and fatalities through vehicle-wildlife collisions. During recent years, conservationists and highway agencies have increasingly worked together to address problems associated with roadways and wildlife. Considerable progress has been made by including in highway construction plans wildlife movement structures that allow safe passage of wildlife across roadways. Human-related developments and roadway traffic are increasing in Arizona, coincident with construction of more paved and wider highways, impacting wildlife populations and providing challenges to biologists, engineers and planners. Appropriate culvert sizing or bridges and wildlife-proof fencing along highways are widely utilized to minimize negative effects of rights-of-way (ROW) on wildlife and to make highways safer for the public. Fencing along highways performs 2 functions that can mitigate impacts of highways on wildlife and motorists: 1) provide barriers to crossing at grade thereby decreasing collisions and increasing motorist safety and 2) funnel movements into and through passage structures including hydrology culverts and roadway bridges. Highways create almost impassible barriers for some amphibians, reptiles, and small mammals. Some may tend to avoid highways at grade, subjecting them to vehicle-related mortalities. Many wildlife species routinely avoid highway passage structures unless "forced" by mitigation fencing to use them. Therefore, fencing is a key component of reducing impacts of highways on wildlife and improving motorist safety.</p> <p>Wildlife linkages background The project area outlined along Interstate 10 has long been recognized as a critical link between the Rincon Mountains to the north, the Santa Rita and Empire Mountain ranges to the south. In addition, the roadway bisects an important north-south wildlife linkage in Pima and Cochise Counties. The specific locations where wildlife cross I-10 have not yet been identified. Therefore, critical to the maintenance of wildlife connectivity in this area is the incorporation of appropriate data driven wildlife linkage studies to identify where wildlife are crossing I-10. This wildlife linkage study, implemented by the Arizona Game and Fish Department, will provide the data to support recommendations for placement and design of crossing structures and extent of exclusion/funnel fencing.</p> <p>Ramifications of no action If funding is not approved for such a study, ADOT engineers will have no supporting information to</p>	<p>Environmental Assessment to identify and develop conceptual solutions to wildlife linkage issues.</p>

Agency / ADOT Section	Reviewer	#	Page/ Sec. No.	Code	Comment	Response
					<p>provide recommendations to the design team for the incorporation of wildlife linkage structures into the design of this roadway project. The result: increased wildlife mortality, fragmentation of wildlife connectivity and habitat, and increased hazards to the motoring public via erratic maneuvers to avoid wildlife or direct collisions with wildlife on the roadway.</p> <p>Wildlife Highway Permeability Study Objectives a. Identify the species, through direct mortality and track count surveys, of wildlife crossing the identified project area; b. Identify locations where wildlife currently cross and potential locations for stretches of exclusion/funnel fence along the project; and c. Establish wildlife linkage recommendations along the project length (such as recommendations on wildlife linkage structures, median design, and fencing); and d. Work with planners to make the project safer for wildlife and the motoring public.</p> <p>Cost projections: Arizona Game and Fish Department-designed and implemented study for wildlife permeability for each 20-mile segment of highway along the I-10 corridor. Proposed budget: \$100,000.00 for wildlife surveys / 20 miles of highway, and \$20,000 to work with engineers throughout the planning and construction phases of the project.</p>	