



Arizona Department of Transportation

Environmental Planning

**Project-Level Particulate Matter (PM10)
And Carbon Monoxide (CO)
Consultation Document**

Warner Rd: Recker Rd to Power Rd

**GIL-0(219)T
0000 MA GIL T0335 01C**

February 20, 2024

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by ADOT pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 16, 2019, and executed by FHWA and ADOT.

All information contained in this document is the property of ADOT. ADOT approval is required prior to reproduction or distribution.

Project-Level PM10 and CO Interagency Consultation

Project Setting and Description

The Arizona Department of Transportation (ADOT), in coordination with the Town of Gilbert has initiated a project to expand Warner Road between Recker Road and Power Road from two lanes to six lanes. The proposed project would expand Recker Road to three eastbound through lanes and Power Road would be expanded to three eastbound and westbound travel lanes, respectively to improve traffic operations and improve turning movements.

The proposed project is in Maricopa County currently designated as nonattainment or maintenance for the National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO), eight-hour ozone, and particulate matter less than or equal to ten microns in diameter (PM-10).

The CO Maintenance Plan currently in effect is the “MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County Area” (MAG, March 2013). As discussed in that plan, there have been no violations of the 1-hour National Ambient Air Quality Standard (NAAQS) for CO (35 parts per million [ppm] since 1984 and no violations of the 8-hour NAAQS (9 ppm) since 1996. There has also been a continuous downward trend in monitored CO concentrations over time and the maintenance demonstration summary described in the 2013 Maintenance Plan details continuing compliance with the CO standard through 2025.

The PM-10 Nonattainment Plan currently in effect is the “The MAG 2012 Five Percent Plan for PM-10 for the Maricopa County Nonattainment Area”, the effective date of this plan as approved by Environmental Protection Agency (EPA) is July 10, 2014. The MAG 2020 Eight-Hour Ozone Plan – Submittal of Marginal Area Requirements for the Maricopa Nonattainment Area was submitted to EPA on June 29, 2020.

This project is a minor arterial included in the in the Maricopa Association of Governments Regional Transportation Plan: Momentum 2050 (MAG, 2021), as described in the Arterial Lifecycle Program [[ACI-WRN-20-03](#)] and the Fiscal Year 2022-2025 Transportation Improvement Program [TIP [GLB24-129](#)] (GIL-0(219)T - Warner Road: Recker Road to Power Road, Construct Roadway Widening).

The current conformity determination of the TIP and MOMENTUM 2050 MAG Regional Transportation Plan for the Maricopa nonattainment and maintenance areas and the Pinal County nonattainment areas was made by the Federal Highway Administration and Federal Transit Administration on September 25, 2023.

The project location is shown in **Figure 1** and the project study area is shown in **Figure 2**.

Figure 1. Project Location Map

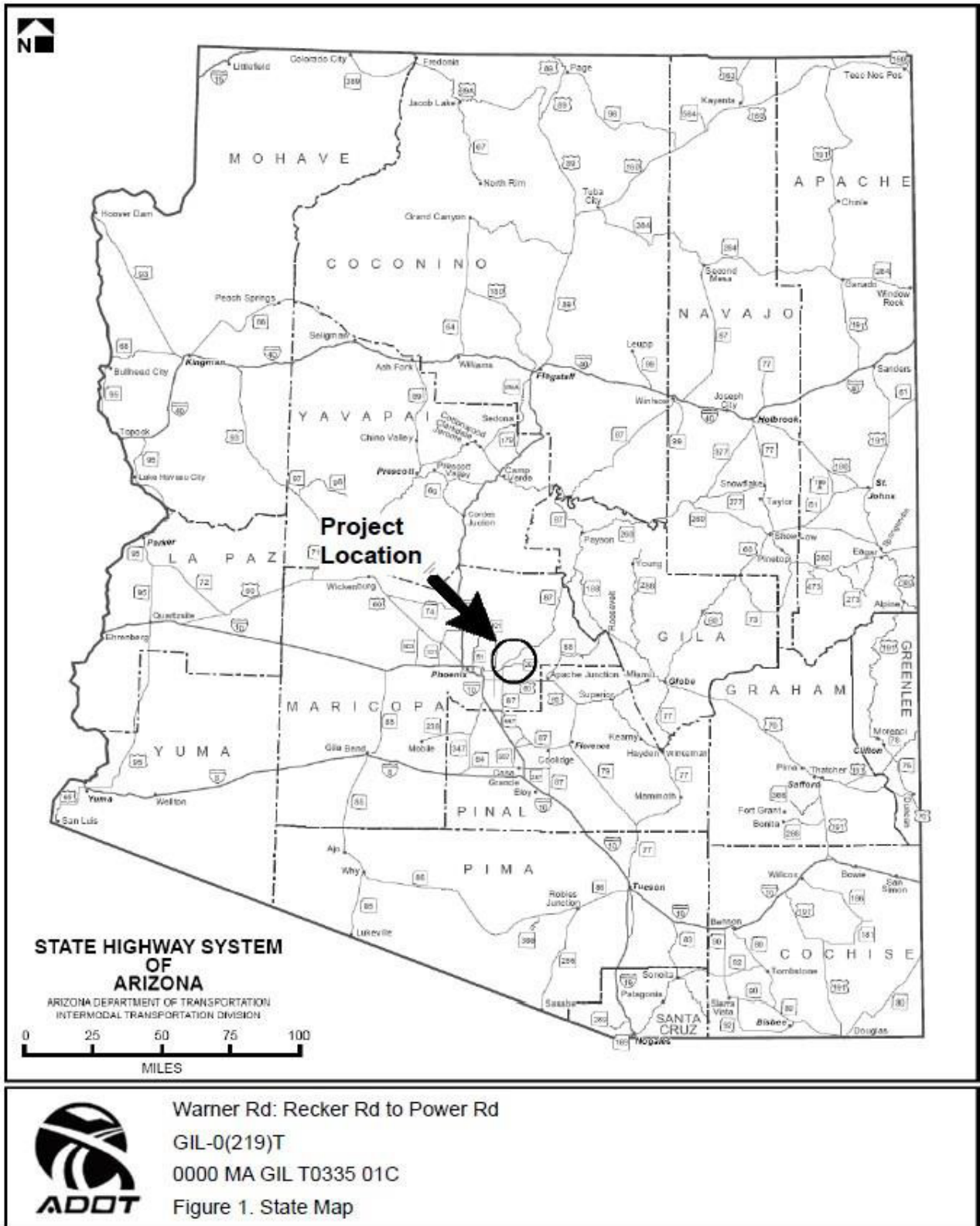
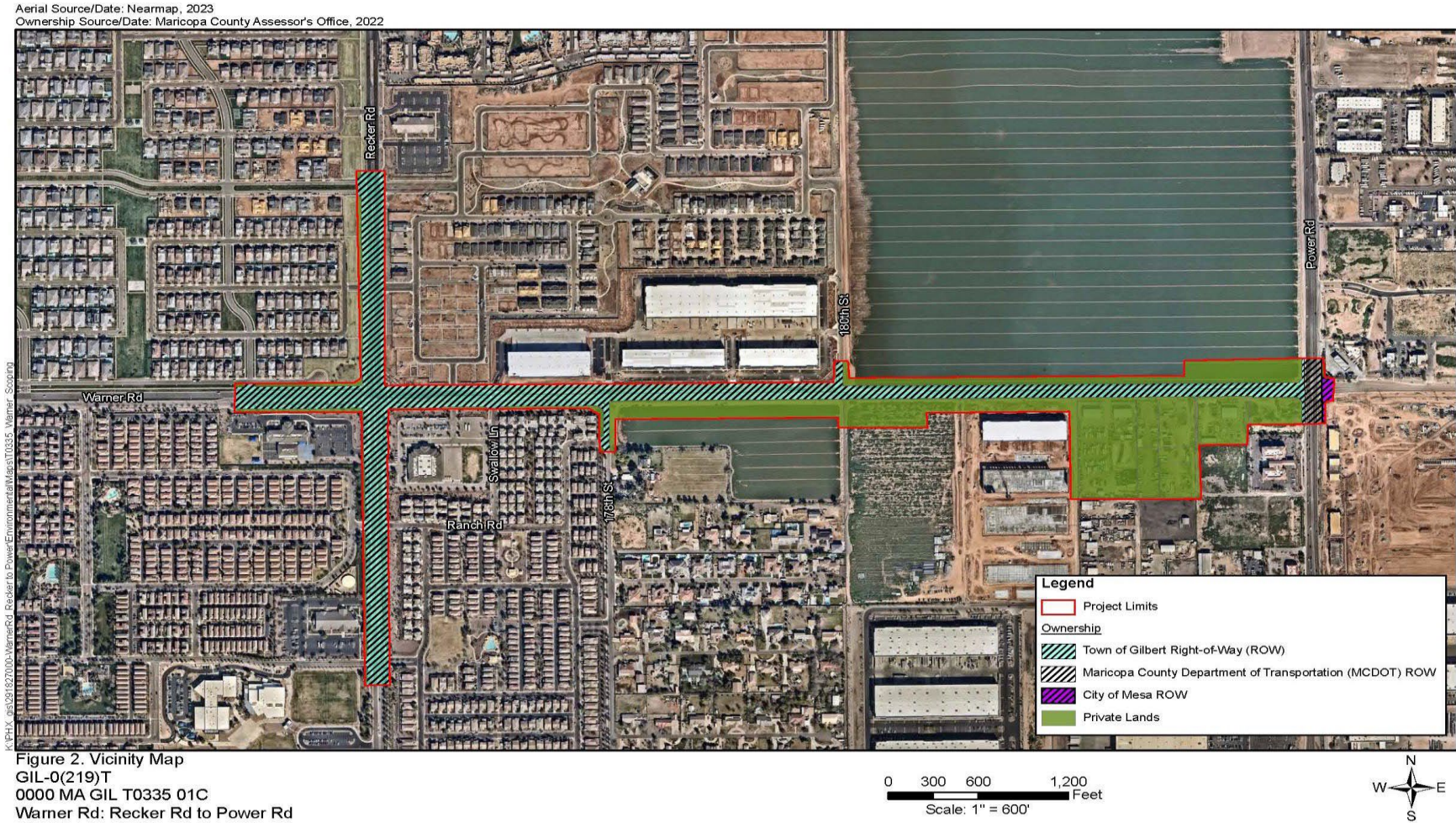


Figure 2. Project Study Area



Project Level PM10 Consultation Project of Air Quality Concern

PM10 Project Assessment

The following questionnaire is used to compare the proposed project to a list of project types in 40 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 Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service 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 NAAQS or any required emission reductions or milestones in any nonattainment or maintenance area.

On March 10, 2006, EPA published *PM_{2.5} and PM₁₀ Hot-Spot Analyses in Project-Level Transportation Conformity Determinations for the New PM_{2.5} and Existing PM₁₀ 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 FR 12468-12511). Specifically on page 12491, EPA provides 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;" .." 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;" While these examples were provided in the rulemaking, interagency consultation will be used to determine if a project is a of air quality concern.

New Highway Capacity

Is this a new highway project that has a significant number of diesel vehicles?

NO - The proposed project is not a new highway project.

Expanded Highway Capacity

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

NO – The proposed project is not an expanded highway capacity project that has a significant increase in the number of diesel-fueled vehicles related to the project. As shown in Table 3 (page 9), the average daily traffic (ADT) volumes on Warner Road from Recker Road Power Road range from about 3,000 vehicles per day (vpd) under 2023 Existing Conditions to about 24,700 vpd under the 2050 Build Alternative.

Compared to the 2050 No-Build Alternative, the total truck ADT increases by about 300 trucks per day as a result of the project. In addition, the total truck volumes shown in Table 3 (page 9) include both medium- and heavy-duty trucks, not all of which would be diesel-fueled. The combined medium- and heavy-duty truck ADT represents a worst-case assumption when considering if the increase in truck volumes represents a significant increase in the number of diesel-fueled vehicles resulting from the project.

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 an increase in traffic volumes from a significant number of diesel trucks related to the project?

NO – This is not a project that affects a congested intersection at LOS D or that will change to LOS D (or greater) because of a significant increase in the number of diesel-fueled trucks resulting from the project (see discussion above and Table 1 (page 8)).

Table 1 (page 8) summarizes the LOS at the two intersections in the project area. The Warner Road/Recker Road intersection would operate at LOS D in the AM and PM peak hour under the 2050 Build Alternative. The Warner Road/Power Road intersection would operate at LOS D during the AM peak hour under the 2050 Build Alternative.

Total truck volumes at both the Warner Road/Recker Road and Warner Road/Recker Road intersections increase by less than 100 trucks per hour in both the AM and PM peak hours compared to 2023 Existing Conditions.

The total truck volumes at both intersections are not deemed to constitute a significant number of diesel-fueled vehicles or represent a significant increase in the volume of diesel-fueled vehicles related to the project.

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 – The proposed project does not involve construction of new bus or rail terminals.

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% or more, as measured by arrivals?

NO – The proposed project does not involve an existing bus or intermodal terminal.

Project of Air Quality Concern Determination

Under the 2050 Build Alternative, traffic volumes on Warner Road are less than 25,000 ADT. The increase in diesel-fueled truck volumes due to the project are also low; about 300 ADT compared to the 2050 No-Build Alternative and include both medium- and heavy-duty trucks, not all of which are diesel-fueled (that is, the truck volumes represent a worst-case condition and likely overstate the number of diesel-fueled trucks in the project area). While overall traffic volumes are expected to increase, the project does not significantly increase diesel-fueled total truck volumes.

The March 2006 final rule also provided examples of projects that would not be covered by 40 CFR 93.123(b)(1) and would not require a PM_{2.5} or PM₁₀ hot-spot analysis (71 FR 12491). This project clearly fits as “any new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number or increase in the number of diesel vehicles), including such projects involving congested intersections operating at Level-of-Service D, E, or F”. Therefore, the proposed improvements on Warner Road from Recker Road to Power Road are NOT of Air Quality Concern and therefore will not require a PM hot-spot analysis.

CO Project Assessment

The following questionnaire is used to compare the proposed project to a list of project types in 40 CFR 93.123(a) requiring a quantitative analysis of local CO emissions (Hot-spots) in nonattainment or maintenance areas, which include:

- i. Projects in or affecting locations, area, or categories of sites which are identified in the applicable implementation plan as sites of violation or possible violation;
- ii. Projects affecting intersections that are at Level-of-Service D, E, or F, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes related to the project;
- iii. Any project affecting one or more of the top three intersections in the nonattainment area or maintenance area with highest traffic volumes, as identified in the applicable implementation plan; and
- iv. Any project affecting one or more of the top three intersections in the nonattainment or maintenance area with the worst level of service, as identified in the applicable implementation plan.

If the project matches one of the listed project types in 40 CFR 123(a)(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).

Projects Affecting CO Sites of Violation or Possible Violation

Does the project affect locations, areas, or categories of sites that are identified in the CO applicable plan or implementation plan submissions, as appropriate, as sites of violation or potential violation?.

NO – The MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County (MAG, March 2013) does not identify sites or categories of potential violation for CO.

Projects with Congested Intersections

Is this a project that affects a congested intersection (LOS D or greater) will change LOS to D or greater because of increased traffic volumes related to the project?

YES – As shown in Table 1, under the 2050 Build alternative, the Warner Road/Recker Road intersection operates at LOS D in both the AM and PM peak hour. The Warner Road/Power Road intersection operates at LOS D in the AM peak hour.

Table 2 shows the ADT at each intersection by individual turning movement (that is, by NB, SB, EB, and WB movements) as well as the number of medium trucks and heavy trucks associated with each turning movement.

As noted above, there have been no violations of the 1-hour or 8-hour CO standard since 1984 and 1996, respectively, even as the region has grown substantially, adding more traffic to local roads. In addition, there has been a continuous downward trend in measured CO concentrations over time and the region continues to meet CO emission standards.

Warner R: Recker Rd to Power Rd Widening
GIL-0(219)T
0000 MA GIL T0335 01C

Table 1. Intersection Level of Service and Peak-Hour Volumes									
Intersection	2023 Existing Conditions				2050 Build				Total Truck Volume Difference (Build - Existing, vph) ¹
	LOS (delay, sec.)	Volumes (vph)	Medium Truck Volumes (vph)	Heavy Truck Volumes (vph)	LOS (delay, sec.)	Volumes (vph)	Medium Truck Volumes (vph)	Heavy Truck Volumes (vph)	
Warner Road/Recker Road	AM: C (24)	AM: 2,584	AM: 26	AM: 52	AM: D (40)	AM: 5,344	AM: 53	AM: 107	AM: 82
	PM: C (23)	PM: 2,976	PM: 30	PM: 61	PM: D (39)	PM: 5,344	PM: 53	PM: 107	PM: 69
Warner Road/Power Road	AM: B (19)	AM: 2,225	AM: 22	AM: 45	AM: D (38)	AM: 4,664	AM: 47	AM: 93	AM: 73
	PM: C (29)	PM: 2,040	PM: 20	PM: 41	PM: C (29)	PM: 4,663	PM: 47	PM: 93	PM: 79

¹ Truck Volume Difference includes both MT and HT
 Source: Kimley-Horn & Associates, November 2023. Final *Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening*. Values in **Red** - greater than acceptable LOS C
 MT - Medium Trucks (vehicles with 2 axles & 6 wheels; gross vehicle weight - 10,000 to 26,400 pounds)
 HT - Heavy Trucks (vehicles with 3 or more axles; gross vehicle weight greater than 26,400 pounds).

Table 2. Intersection Average Daily Traffic Volumes and Truck Volumes

		2050 No-Build					2050 Build					Difference (Build - No-Build)
Intersection		ADT					ADT					
		NB	SB	EB	WB	Total	NB	SB	EB	WB	Total	
Recker Road/Warner Road		14,832	10,779	9,411	7,258	42,280	13,127	12,429	13,952	12,310	51,818	9,538
	MT	148	108	94	73	423	131	124	140	123	518	95
	HT	297	216	188	145	846	263	249	279	246	1,037	191
Power Road/Warner Road		20,612	20,480	4,737	1,000	46,829	21,528	17,142	11,022	9,672	59,364	12,535
	MT	206	205	47	10	468	215	171	110	97	593	125
	HT	412	410	95	20	937	431	343	220	193	1,187	250

Source: Email from Jennifer Simpkins (Kimley-Horn & Associates) to Curt Overcast (Newton Environmental Consultants), T0335 Warner Road - EPA Comment, 2/6/24

MT - Medium Trucks (vehicles with 2 axles & 6 wheels; gross vehicle weight - 10,000 to 26,400 pounds)

HT - Heavy Trucks (vehicles with 3 or more axles; gross vehicle weight greater than 26,400 pounds)

Table 3. Warner Road Average Daily Traffic and Truck Volumes

Roadway Segment	2023 Existing				2050 No-Build				2050 Build				Total Truck ADT Difference (Build - No-Build)
	ADT	Total Truck ADT	MT Volume	HT Volume	ADT	Total Truck ADT	MT Volume	HT Volume	ADT	Total Truck ADT	MT Volume	HT Volume	
Warner Road from Recker Road to Power Road	2,975	89	30	60	14,653	440	147	293	24,738	742	247	495	302

Notes: ADT - Average daily traffic
 MT - Medium Trucks (vehicles with 2 axles & 6 wheels; gross vehicle weight - 10,000 to 26,400 pounds).
 HT - Heavy Trucks (vehicles with 3 or more axles; gross vehicle weight greater than 26,400 pounds).
 Source: Kimley-Horn & Associates, November 2023. *Final Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening.*

Table 3 above shows the Average Daily Traffic (ADT) volumes on Warner Road from Recker Road to Power Road. Average daily traffic volumes range from about 3,000 vehicles per day under 2023 Existing Conditions to about 24,700 under the 2050 Build Alternative.

Projects Affecting Intersections with Highest Traffic Volumes

Does the project affect one or more of the top three intersections in the CO maintenance area with the highest traffic volumes identified in the CO applicable implementation plan?

NO - There are 2 intersections within the project limits as shown in Table 1. The 3 intersections with the highest traffic volumes in the *MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County Area, March 2013* are located outside the project limits:

- Priest Drive & Southern Avenue
- 16th Street & Camelback Road
- 107th Avenue & Grand Avenue

Projects Affecting Intersections with the Worst Level of Service

Does the project affect one or more of the top three intersections in the CO maintenance area with the worst level of services identified in the CO applicable maintenance plan?

NO - There are 2 intersections within the project limits as shown in Table 1. The 3 intersections with worst level of service in the *MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County Area, March 2013* are located outside the project limits:

- 7th Avenue & Van Buren Street
- German Road & Gilbert Road
- Thomas Road & 27th Avenue

The modeling conducted for the *MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County Area*, approved by EPA effective April 4, 2016, demonstrates continuing maintenance of the CO standard through 2025.

The modeling in that plan used 2025 in the future-year evaluation (*MAG 2013 Carbon Monoxide Maintenance Plan for the Maricopa County Area – Appendices, page 180ff, March 2013*). Based on the Motor Vehicle Emissions Simulator (MOVES) model used at that time (MOVES2010b), the highest 1-hour modeled CO concentration at the six highest intersections identified in the maintenance plan was 0.5 ppm. The highest 8-hour modeled CO concentration at the six intersections was 1.7 ppm which included a background CO concentration of 1.3 ppm.

Based on improved fuel standards and other technological improvements in vehicle operating efficiencies since 2013, including revisions to the MOVES model, it is reasonable to assume that the intersections associated with the proposed project would not exceed the CO NAAQS of 35 ppm (1-hour) or 9 ppm (8-hour) under the 2050 Recommended Build alternative.

Conclusion

Under the 2050 Build alternative the Warner Road/Recker Road intersection operates at LOS D in the AM and PM peak hours. The Warner Road/Power Road intersection operates at LOS D in the AM peak hour. Therefore, both intersections are to be evaluated for an appropriate hot-spot analysis requirement, as provided in Part B of the Project Assessment.

Project Documentation

Decide which type of hot-spot analysis is required for the project by choosing a category below.

Hot-Spot Determination

Decide which type of hot-spot analysis is required for the project by choosing a category below.

If answered “Yes” to any of the questions in the CO Project Assessment

- A quantitative CO hot-spot analysis is required under 40 CFR 93.123(a)(1).
- Check **If** a formal air quality report for conformity is required for this project.
 - The applicable air quality models, data bases, and other requirements specified in 40 CFR part 51, Appendix W (Guideline on Air Quality Models) should be completed using **“Project Level CO Quantitative Hot-Spot Analysis – Consultation Document”** circulated through interagency consultation for review and comments for 30 days prior to commencing any modeling activities.
 - **Or**

Check **If** the project fits the condition of the **“CO Categorical Hot-Spot Finding”**.

In the January 24, 2008, Transportation Conformity Rule Amendments, EPA included a provision at 40 CFR 93.123(a)(3) to allow the U.S. DOT, in consultation with EPA, to make categorical hot-spot findings in CO nonattainment and maintenance areas if appropriate modeling showed that a type of highway or transit project would not cause or contribute to a new or worsened air quality violation of the CO NAAQS or delay timely attainment of the NAAQS or required interim milestone(s), as required under 40 CFR 93.116(a).

Projects Fitting the Condition of the CO Categorical Hot-Spot Finding (Updated 2/1/23)

If the project’s parameters fall within the acceptable range of modeled parameters, use FHWA 2023 CO Categorical Hot-Spot Finding Spreadsheet Tool:

https://www.fhwa.dot.gov/environment/air_quality/conformity/policy_and_guidance/cmcf_2023/index.cfm

YES – The project intersections fit the conditions of the CO Categorical Hot-Spot Finding.

The Categorical Hot-Spot Finding Tool results are included below. Excerpts from the *Draft Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening* (Kimley Horn, July 2023) and other data sources supporting the Categorical Hot-Spot Finding are included as Attachment A.

If answered “No” to all of the questions in the Project Assessment – Part A

- A qualitative CO analysis is required under 40 CFR 93.123(a)(2). The demonstrations required by 40 CFR 93.116 Localized CO, PM10, and PM2.5 violations (hot-spots) may be based on either:
 - **(i) Quantitative methods that represent reasonable and common professional practice;**

Check **If** an Air Quality Report includes CO modeling for NEPA EA/EIS use this report to satisfy option (i)

- Or

- **(ii) A qualitative consideration of local factors if this can provide a clear demonstration that the requirements of 40 CFR 93.116 are met.**

-

Check **If** there is an Air Quality Report that does not include CO modeling for NEPA EA/EIS use this report to satisfy (ii)

Check **If** the project is a CE under NEPA that does not require Air Quality Report for NEPA EA/EIS use this Questionnaire to add additional justification to satisfy (ii)

Categorical Hot-Spot Finding Results: Warner Road/Power Road Intersection

Federal Highway Administration (FHWA) 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding: Spreadsheet Tool Results

[Reset](#)

Parameter	Description	Acceptable Range	Input
Analysis Year	The year when peak emissions are expected from the project when considered with background.	≥ 2022	2025
Area Type - use drop down to select	An urban area has a population of 5,000 or greater within the FHWA adjusted urban area boundary. All other areas are rural.	Urban or Rural	Urban
Road Grade (%)	The maximum grade along the approach, as measured from the stop line to a point 100 feet before the stop line along a line parallel to the direction of travel. Enter the maximum grade among the four	≤6	2
Truck Percent (%)	The percentage of the total traffic volume that is made up of single unit and combination trucks. Enter the highest truck percentage from all links at the project intersection.	≤20	3
Temperature (°F)	Section 4.7.1 of EPA's 1992 CO Guideline allows two methods: 1) temperature corresponding to each of the ten highest non-overlapping 8-hour CO monitoring values for the last 3 years, or 2) average January temperature.	≤ 70	56.9
Speed (mph)	The average speed approaching the intersection during the peak hour. All intersection approaches must be within the acceptable range.	15-45	35
Peak Hour Approach Volume (veh/hr)	The volume approaching the intersection during the peak hour. Enter the maximum among the four approaches.	≤ 2640	1938
Peak Hour Level-of-Service (LOS) - use drop down to select	During the peak hour, the letter representing the quality of service for the entire intersection measured on an A-F scale, with LOS A representing the best operating conditions from the traveler's perspective and LOS F the worst.	A-E	D
Intersection Angle (degrees)	Enter the smallest angle between the two cross-streets of the intersection (90 degrees is perpendicular).	≥ 75	90
Number of through lanes (one direction) - use drop down to select	The number of lanes approaching the intersection available for vehicles traveling through the intersection without turning. Enter the maximum among the four approaches.	≤ 4	3
Number of left turn lanes (one direction) - use drop down to select	The number of lanes approaching the intersection that are designated for use only by vehicles making left turns. Enter the maximum among the four approaches.	≤ 2	2
Lane Width (feet)	The lateral distance between stripes for a single lane. Enter the minimum among all lanes at the intersection.	≥ 10	12
Median Width (feet)	The width of the area in the middle of a roadway separating opposing traffic flows.	Any (≥ 0)	0
Persistence Factor	The factor used to calculate 8-hour concentration estimates from 1-hour concentration estimates, as determined by following Section 4.7.2 of EPA's 1992 CO Guideline.	0-1.0	0.86

Parameters that Vary by Scenario	Description	Acceptable Range (varies based on previous inputs)	Input
1-Hour Avg. CO Background Concentration (ppm)	1-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO	≤ 29.8	3.2
8-Hour Avg. CO Background Concentration (ppm)	8-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO Guideline.	≤ 4.528	1.6

Output			
Scenario	Area Type	Roadway Contribution: 1-Hour CO Concentration (PPM)	Roadway Contribution: 8-Hour CO Concentration (PPM)
High Grade High Truck	Urban	5.2	4.472

Prepared By:	Curt Overcast, Newton Environmental Consulting, LLC (11/20/23)_revised 2.2.24
Project Name:	Warner Road: Recker Street to Power Road Roadway Widening
Intersection Name:	Power Road/Warner Road

Categorical Hot-Spot Finding Results: Warner Road/Recker Road Intersection

Federal Highway Administration (FHWA) 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding: Spreadsheet Tool Results

[Reset](#)

Parameter	Description	Acceptable Range	Input
Analysis Year	The year when peak emissions are expected from the project when considered with background.	≥ 2022	2025
Area Type - use drop down to select	An urban area has a population of 5,000 or greater within the FHWA adjusted urban area boundary. All other areas are rural.	Urban or Rural	Urban
Road Grade (%)	The maximum grade along the approach, as measured from the stop line to a point 100 feet before the stop line along a line parallel to the direction of travel. Enter the maximum grade among the four	≤6	2
Truck Percent (%)	The percentage of the total traffic volume that is made up of single unit and combination trucks. Enter the highest truck percentage from all links at the project intersection.	≤20	3
Temperature (°F)	Section 4.7.1 of EPA's 1992 CO Guideline allows two methods: 1) temperature corresponding to each of the ten highest non-overlapping 8-hour CO monitoring values for the last 3 years, or 2) average January temperature.	≤ 70	56.9
Speed (mph)	The average speed approaching the intersection during the peak hour. All intersection approaches must be within the acceptable range.	15-45	35
Peak Hour Approach Volume (veh/hr)	The volume approaching the intersection during the peak hour. Enter the maximum among the four approaches.	≤ 2640	1256
Peak Hour Level-of-Service (LOS) - use drop down to select	During the peak hour, the letter representing the quality of service for the entire intersection measured on an A-F scale, with LOS A representing the best operating conditions from the traveler's perspective and LOS F the worst.	A-E	D
Intersection Angle (degrees)	Enter the smallest angle between the two cross-streets of the intersection (90 degrees is perpendicular).	≥ 75	90
Number of through lanes (one direction) - use drop down to select	The number of lanes approaching the intersection available for vehicles traveling through the intersection without turning. Enter the maximum among the four approaches.	≤ 4	3
Number of left turn lanes (one direction) - use drop down to select	The number of lanes approaching the intersection that are designated for use only by vehicles making left turns. Enter the maximum among the four approaches.	≤ 2	1
Lane Width (feet)	The lateral distance between stripes for a single lane. Enter the minimum among all lanes at the intersection.	≥ 10	12
Median Width (feet)	The width of the area in the middle of a roadway separating opposing traffic flows.	Any (≥ 0)	0
Persistence Factor	The factor used to calculate 8-hour concentration estimates from 1-hour concentration estimates, as determined by following Section 4.7.2 of EPA's 1992 CO Guideline.	0-1.0	0.86

Parameters that Vary by Scenario	Description	Acceptable Range (varies based on previous inputs)	Input
1-Hour Avg. CO Background Concentration (ppm)	1-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO	≤ 29.8	3.2
8-Hour Avg. CO Background Concentration (ppm)	8-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO Guideline.	≤ 4.528	1.6

Output			
Scenario	Area Type	Roadway Contribution: 1-Hour CO Concentration (PPM)	Roadway Contribution: 8-Hour CO Concentration (PPM)
High Grade High Truck	Urban	5.2	4.472

Prepared By:	Curt Overcast, Newton Environmental Consulting, LLC (11/20/23) revised 2.2.24
Project Name:	Warner Road: Recker Street to Power Road Roadway Widening
Intersection Name:	Recker Road/Warner Road

Attachment A

Supporting Data for FHWA 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding

- **Analysis Year [The year when peak emissions are expected from the project when considered with background]**

The FY2022 - FY2025 TIP estimates the proposed project would be in use by 2025. Therefore, 2025 was used as the year of peak emissions in the hot-spot tool.

- **Area Type [An urban area has a population of 5,000 or greater within the FHWA adjusted urban area boundary. All other areas are rural]**

The proposed project is located within the Gilbert town boundary (<https://www.arcgis.com/apps/mapviewer/index.html?layers=934cbb7b346a42fd8c49cbc086417838>, accessed November 16, 2023). The 2021 census bureau population of Gilbert was about 273,000; therefore, the urban area type was used in the hot-spot tool.

- **Road Grade (%) [The maximum grade along the approach, as measured from the stop line to a point 100 feet before the stop line along a line parallel to the direction of travel. Enter the maximum grade among the four approaches]**

Images of the Warner Road/Recker Road and Warner Road/Power Road intersections are shown below. The topography surrounding each intersection is flat. To be conservative a 2% grade was used in the hot-spot tool.

Warner Road/Recker Road



Warner Road/Power Road



- **Truck Percent (%) [The percentage of the total traffic volume that is made up of single unit and combination trucks. Enter the highest truck percentage from all links at the project intersection]**

The truck percentage used in the hot-spot tool of 3% was derived from Table 8 (Air Quality Report Daily Traffic Volumes and Truck Percentages) of the *Final Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening* (Kimley Horn, November 2023) shown below.

Table 8. Air Quality Report Daily Traffic Volumes and Truck Percentages

	2023 Existing	2050 No-Build	2050 Build
Warner Road between Recker Road and Power Road			
Total ADT	2,975	14,653	24,738
Truck ADT	89	440	742
Truck %	3%	3%	3%

- **Temperature (°F) [Section 4.7.1 of EPA's 1992 CO Guideline allows two methods: 1) temperature corresponding to each of the ten highest non-overlapping 8-hour CO monitoring values for the last 3 years, or 2) average January temperature]**

Average January temperatures were derived from National Weather Service data as shown below ([Annual and Monthly Record data for Phoenix \(weather.gov\)](https://www.weather.gov/Phoenix/annual-monthly-record)). An average January temperature of 56.9 °F was used in the hot-spot tool.

Climate Data for Phoenix, Arizona (2000-2023)				
Month	Temperature (°F)			Precipitation (inches) Average
	Average Daily	Average Daily Maximum	Average Daily Minimum	
January	56.9	68.0	45.8	0.72

Source: National Weather Service, 2023

- **Speed (mph) [The average speed approaching the intersection during the peak hour. All intersection approaches must be within the acceptable range]**

The posted speed limit on Warner Road, Recker Road, and Power Road under the 2050 Build Alternative is 45 mph as shown in Figure 7 below of the *Final Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening* (Kimley Horn, November 2023). The average speed during the peak hour would likely be lower due to higher traffic volumes approaching the signalized intersections during the peak hour. To be conservative, a speed limit of 35 mph was used in the hot-spot tool evaluation.

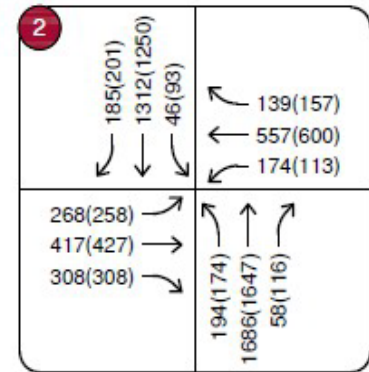
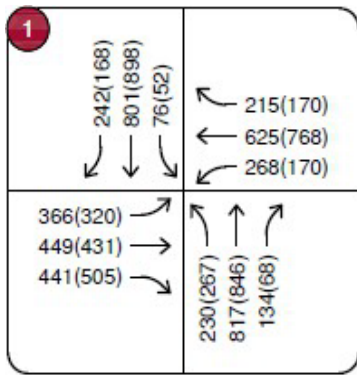


- **Peak Hour Approach Volume (veh/hr) [The volume approaching the intersection during the peak hour. Enter the maximum among the four approaches]**

The maximum peak hour approach volumes at the Warner Road/Recker Road and Warner Road/Power Road intersections were derived from Figure 6 (2050 Traffic Volume) of the *Final Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening* (Kimley Horn, November 2023) as shown in the image below. The maximum approach volume at the Warner Road/Recker Road intersection of 1,256 vehicles per hour (eastbound approaches) was used in the hot-spot tool. The maximum approach volume at the Warner Road/Power Road intersection of 1,938 vehicles per hour (northbound approaches) was used in the hot-spot tool.

Warner Road/Recker Road

Warner Road/Power Road



- **Peak Hour Level-of-Service (LOS)** [During the peak hour, the letter representing the quality of service for the entire intersection measured on an A-F scale, with LOS A representing the best operating conditions from the traveler's perspective and LOS F the worst]

As shown above in Table 1 of the Consultation Document (Intersection Level of Service and Peak Hour Volumes), the Warner Road/Recker Road intersection operates at LOS D under the 2050 Build Alternative in both the AM and PM peak hours. The Warner Road/Power Road intersection operates at LOS D under the 2050 Build Alternative in the AM peak hour.

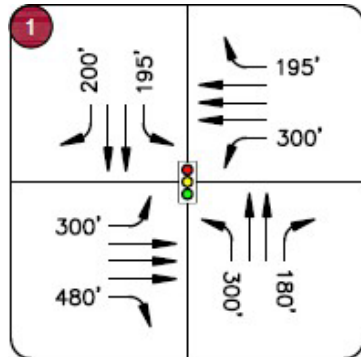
- **Intersection Angle (degrees)** (Enter the smallest angle between the two cross-streets of the intersection (90 degrees is perpendicular))

As shown in Figure 2 of the Consultation Document (Project Study Area), both Recker Road and Power Road intersect Warner Road at 90 degrees. 90 degrees was used as the intersection angle in the hot-spot tool evaluation.

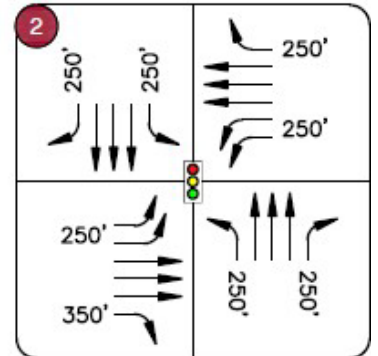
- **Number of through lanes (one direction)** [The number of lanes approaching the intersection available for vehicles traveling through the intersection without turning. Enter the maximum among the four approaches]

Figure 7 (2050 Recommended Lane Configuration and Traffic Control) of the *Final Traffic Report, Warner Road: Recker Road to Power Road Roadway Widening* (Kimley Horn, November 2023) shows a maximum of three through travel lanes at each intersection.

Warner Road/Recker Road



Warner Road/Power Road



- **Number of left turn lanes (one direction)** [The number of lanes approaching the intersection that are designated for use only by vehicles making left turns. Enter the maximum among the four approaches]

The image above shows a maximum of one left- turn lane at the Warner Road/Recker Road intersection and two left-turn lanes at the Warner Road/Power Road intersection.

- **Lane Width (feet)** [The lateral distance between stripes for a single lane. Enter the minimum among all lanes at the intersection]

A standard lane width of 12 feet was used in the hot-spot evaluation tool.

- **Median Width (feet)** (The width of the area in the middle of a roadway separating opposing traffic flows.)

There would be no median separating travel lanes under the 2050 Build Alternative. A median width of 0 feet was used in the hot-spot evaluation tool.

- **Persistence Factor** [The factor used to calculate 8-hour concentration estimates from 1-hour concentration estimates, as determined by following Section 4.7.2 of EPA's 1992 CO Guideline]

For a separate project in Maricopa County in a more urbanized location, the Maricopa County Air Quality Department calculated a persistence factor of 0.86. To

be conservative, the higher calculated persistence factor of 0.86 was used in the hot-spot tool evaluation.

- **1-Hour Avg. CO Background Concentration (ppm) [1-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO Guideline]**

8-Hour Avg. CO Background Concentration (ppm) [8-hour average concentration in the project area due to other local sources, determined in most cases from local monitoring data as described in Section 4.7.3 of EPA's 1992 CO Guideline]

As shown in the table below there are two CO monitors in the vicinity of the project location, both about 11 miles NW and SW of Warner Road, respectively. Over the last 3 years of available monitoring data the Mesa Station had the highest 1-hour (3.2 ppm) and 8-hour (1.6 ppm) CO concentrations. The highest monitored concentrations were used in the hot-spot evaluation.

Carbon Monoxide Monitors Near Warner Road Project Location				
Monitor	Distance to Warner Road Project Location (miles)	2020 Maximum CO Concentration (1-hour/8-hour)	2021 Maximum CO Concentration (1-hour/8-hour)	2022 Maximum CO Concentration (1-hour/8-hour)
Mesa Station (310 S. Brooks)	11.0 miles NW	3.2/1.6	1.7/1.1	2.1/1.3
Chandler Station (275 S. Ellis)	11.0 miles SW	1.5/1.3	1.4/1.2	1.3/1.1
Source: US EPA AirData (https://www.epa.gov/outdoor-air-quality-data/monitor-values-report , accessed November 17, 2023) Values in Red - highest 1-hour and 8-hour CO concentrations over the 2020 to 2022 timeframe Concentrations shown in parts per million (ppm)				

Output

Based on the inputs to the CO Categorical Hot-Spot Finding Tool described above, CO concentrations at each intersection were as follows:

CO Categorical Hot-Spot Tool Results		
Intersection	1-hour CO Concentration	8-hour CO Concentration
Recker Road/Warner Road	5,2	4.472
Power Road/Warner Road	5.2	4.472

The 1-hour and 8-hour CO concentrations were less than the applicable NAAQS.

Interagency Comments, Responses and Meeting Minutes



Beverly Chenausky <bchenausky@azdot.gov>

Re: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

1 message

Beverly Chenausky <bchenausky@azdot.gov>

Wed, Feb 21, 2024 at 3:20 PM

To: "Wickersham, Lindsay (she/her)" <wickersham.lindsay@epa.gov>, "Johanna Kuspert (AQD)" <Johanna.Kuspert@maricopa.gov>, Transportationconformity <transportationconformity@azdeq.gov>, Rebecca Yedlin <rebecca.yedlin@dot.gov>, Matthew Poppen <mpoppen@azmag.gov>
Cc: Curt Overcast <estreetcmo@gmail.com>, Angela Newton <angie@newtonec.com>, "Simpkins, Jennifer" <Jennifer.Simpkins@kimley-horn.com>, ADOTAirNoise - ADOT <adotairnoise@azdot.gov>, Katie Rodriguez <krodriguez@azdot.gov>, Joonwon Joo <jjoo@azdot.gov>, Tatum Wertin <twertin@azdot.gov>, Ivan Racic <iracic@azdot.gov>, Lisa Danka <ldanka2@azdot.gov>, Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>, Dean Giles <dgiles@azmag.gov>, "Perez, Idalia (she/her/hers)" <perez.idalia@epa.gov>, Clifton Meek <meeek.clifton@epa.gov>, "Halle, Greta (FHWA)" <greta.halle@dot.gov>, Karina O'Conner <oconnor.karina@epa.gov>, Chris Rodriguez <CRodriguez9@azdot.gov>

As there are no objections to the project determination presented, interagency consultation has concluded with the project identified as a project that does not require a quantitative PM10 hot-spot analysis as listed under 40 CFR 93.123(b) and does not require CO hot-spot modeling by utilizing the categorical hot-spot finding under 40 CFR 93.123(a)(3). Please find attached the final version of the documentation including agencies responses and corrections requested through this consultation period.

Thanks, Beverly

On Wed, Jan 17, 2024 at 11:18 AM Beverly Chenausky <bchenausky@azdot.gov> wrote:

To All:

ADOT is presenting the following local Town of Gilbert project, **Warner Rd: Recker Rd to Power Rd**, for interagency consultation, per 40 CFR 93.105, with the recommendation that this project is not a project of Air Quality Concern and thereby will not require a quantitative PM10 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.

Additionally, ADOT has determined that the project is eligible to utilize the FHWA 2023 CO Categorical Hot-Spot Finding, refer to "Attachment A: Supporting Data for FHWA 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding" in the attached in document *T0355_Warner Road_Consultation_01172024.pdf*. 40 CFR 93.123(a)(3) states, "DOT, in consultation with EPA, may also choose to make a categorical hot-spot finding that §93.116(a) is met without further hot-spot analysis for any project described in paragraphs (a)(1) and (a)(2) of this section based on appropriate modeling."

It is requested that the consulted parties provide comments on the attached document by **February 16th, 2024**, a non-response will be interpreted as concurrence with the approach as described in the attached Consultation document.

The project team will be available for any additional discussions at ADOT's standing monthly air quality project meeting, please forward to those interested.

ADOT Transportation Conformity Coordination

Thursday, February 8 · 10:00 – 11:00am

Time zone: America/Phoenix

Google Meet joining info

Video call link: <https://meet.google.com/usc-ivuz-eof>

Or dial: (US) +1 585-667-0052 PIN: 813 049 123#

More phone numbers: <https://tel.meet/usc-ivuz-eof?pin=9640464285692>

Please let me know if you have any additional questions or need additional information.

Thank you,

Beverly T. Chenausky

Assistant Environmental Administrator

Air & Noise, Hazmat and Standards & Training

205 South 17th Avenue, MD EM02

Phoenix, AZ 85007

C: 480.390.3417

azdot.gov



 **T0355_Warner Road_Consultation_Final_022124.pdf**
2873K



Beverly Chenausky <bchenausky@azdot.gov>

RE: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

1 message

Wickersham, Lindsay (she/her/hers) <wickersham.lindsay@epa.gov>

Wed, Feb 14, 2024 at 5:35 PM

To: Beverly Chenausky <bchenausky@azdot.gov>, "rebecca.yedlin@dot.gov" <rebecca.yedlin@dot.gov>

We also have no further comments at this time. Thank you for all the great work and documentation that went into this write up!

Lindsay Wickersham (she/hers) | 415-947-4192

Physical Scientist | Planning Section (AIR-2-1) | Air and Radiation Division | US EPA - Region 9

From: Wickersham, Lindsay (she/her/hers)**Sent:** Wednesday, February 14, 2024 4:33 PM**To:** 'Yedlin, Rebecca (FHWA)' <Rebecca.Yedlin@dot.gov>; 'bchenausky azdot.gov' <bchenausky@azdot.gov>; 'Tim Franquist' <tfranquist@azmag.gov>; 'Johanna.Kuspert@maricopa.gov'; 'Transportationconformity' <transportationconformity@azdeq.gov>**Cc:** 'Curt Overcast' <estreetcmo@gmail.com>; 'Angela Newton' <angie@newtonec.com>; 'Simpkins, Jennifer' <Jennifer.Simpkins@kimley-horn.com>; 'ADOTAirNoise - ADOT' <adotairnoise@azdot.gov>; 'Katie Rodriguez' <krodriguez@azdot.gov>; 'Joonwon Joo' <jjoo@azdot.gov>; 'Tatum Wertin' <twertin@azdot.gov>; 'Ivan Racic' <iracic@azdot.gov>; 'Lisa Danka' <ldanka2@azdot.gov>; 'Veronica Ruiz Ronquillo' <vrronquillo@azdot.gov>; 'Dean Giles' <dgiles@azmag.gov>; 'Perez, Idalia (she/her/hers)' <Perez.Idalia@epa.gov>; 'Meek, Clifton' <meek.clifton@epa.gov>; 'Halle, Greta (FHWA)' <greta.halle@dot.gov>; 'Oconnor, Karina (she/her/hers)' <OConnor.Karina@epa.gov>; 'Chris Rodriguez' <CRodriguez9@azdot.gov>**Subject:** RE: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

Hi Beverly,

I wanted to follow up from my previous email for the record.

After reviewing the attached table containing truck data for this project in ADT, that was sent to me on 2/7/24, we concur that this project is **not** a project of air quality concern and a PM hot spot analysis will not be needed. We request that a version of this table be included in the documentation for this project.

Thank you,

Lindsay

Lindsay Wickersham (she/hers) | 415-947-4192



Curt Overcast <estreetcmo@gmail.com>

Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Thu, Feb 1, 2024 at 12:24 PM

To: "bchenausky azdot.gov" <bchenausky@azdot.gov>, Tim Franquist <tfranquist@azmag.gov>, "Wickersham, Lindsay (she/her)" <wickersham.lindsay@epa.gov>, "Johanna Kuspert (AQD)" <Johanna.Kuspert@maricopa.gov>, Transportationconformity <transportationconformity@azdeq.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>, Angela Newton <angie@newtonec.com>, "Simpkins, Jennifer" <Jennifer.Simpkins@kimley-horn.com>, ADOTAirNoise - ADOT <adotairnoise@azdot.gov>, Katie Rodriguez <krdriguez@azdot.gov>, Joonwon Joo <jjoo@azdot.gov>, Tatum Wertin <twertin@azdot.gov>, Ivan Racic <iracic@azdot.gov>, Lisa Danka <ldanka2@azdot.gov>, Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>, Dean Giles <dgiles@azmag.gov>, "Perez, Idalia (she/her/hers)" <perez.idalia@epa.gov>, Clifton Meek <meek.clifton@epa.gov>, "Halle, Greta (FHWA)" <greta.halle@dot.gov>, Karina O'Conner <oconnor.karina@epa.gov>, Chris Rodriguez <CRodriguez9@azdot.gov>

FHWA reviewed the consultation documents for the Warner Road project and has one comment – the CO categorical finding tool we need to be redone with 2025 instead of 2040 since it is the opening year. Thanks, Rebecca

From: Beverly Chenausky <bchenausky@azdot.gov>

Sent: Wednesday, January 17, 2024 11:18 AM

To: Tim Franquist <tfranquist@azmag.gov>; Wickersham, Lindsay (she/her) <wickersham.lindsay@epa.gov>; Johanna Kuspert (AQD) <Johanna.Kuspert@maricopa.gov>; Transportationconformity <transportationconformity@azdeq.gov>; Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krdriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic <iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <dgiles@azmag.gov>; Perez, Idalia (she/her/hers) <perez.idalia@epa.gov>; Clifton Meek <meek.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Karina O'Conner <oconnor.karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To All:

ADOT is presenting the following local Town of Gilbert project, **Warner Rd: Recker Rd to Power Rd**, for interagency consultation, per 40 CFR 93.105, with the recommendation that this project is not a project of Air Quality Concern and thereby will not require a quantitative PM10 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.

Additionally, ADOT has determined that the project is eligible to utilize the FHWA 2023 CO Categorical Hot-Spot Finding, refer to "Attachment A: Supporting Data for FHWA 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding" in the attached in document *T0355_Warner Road_Consultation_01172024.pdf*. 40 CFR 93.123(a)(3) states, "DOT, in

consultation with EPA, may also choose to make a categorical hot-spot finding that §93.116(a) is met without further hot-spot analysis for any project described in paragraphs (a)(1) and (a)(2) of this section based on appropriate modeling."

It is requested that the consulted parties provide comments on the attached document by **February 16th, 2024**, a non-response will be interpreted as concurrence with the approach as described in the attached Consultation document.

The project team will be available for any additional discussions at ADOT's standing monthly air quality project meeting, please forward to those interested.

ADOT Transportation Conformity Coordination

Thursday, February 8 · 10:00 – 11:00am

Time zone: America/Phoenix

Google Meet joining info

Video call link: <https://meet.google.com/usc-ivuz-eof>

Or dial: (US) +1 585-667-0052 PIN: 813 049 123#

More phone numbers: <https://tel.meet/usc-ivuz-eof?pin=9640464285692>

Please let me know if you have any additional questions or need additional information.

Thank you,

Beverly T. Chenausky

Assistant Environmental Administrator

Air & Noise, Hazmat and Standards & Training

[205 South 17th Avenue](#), MD EM02

Phoenix, AZ 85007

C: 480.390.3417

azdot.gov

Physical Scientist | Planning Section (AIR-2-1) | Air and Radiation Division | US EPA - Region 9

From: Wickersham, Lindsay (she/her/hers)

Sent: Tuesday, February 6, 2024 12:01 PM

To: Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>; bchenausky [azdot.gov](mailto:bchenausky@azdot.gov) <bchenausky@azdot.gov>; Tim Franquist <tfranquist@azmag.gov>; Johanna.Kuspert@maricopa.gov; Transportationconformity <transportationconformity@azdeq.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krdriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic <iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <dgiles@azmag.gov>; Perez, Idalia (she/her/hers) <Perez.Idalia@epa.gov>; Meek, Clifton <meek.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Oconnor, Karina (she/her/hers) <OConnor.Karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: RE: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

Hi Beverly,

Thank you for putting these documents together and sending them to us for interagency consultation. Overall there has been major improvements in the documentation provided to us—Appendix A looks great 😊

At this time, we would like to request that the data in, “Table 1. Intersection Level of Service and Peak-Hour Volumes” also be presented in Truck ADT for our consideration. In the past EPA has used ADT or AADT to determine if a project has a significant number of diesel vehicles. We would like to see the data in this format before we can determine if this project is a project of air quality concern (POAQC) or not. We also recommend including the data in this format for future POAQC determinations.

We also agree with FHWA’s comment below suggesting that 2025 be used instead of 2040 in the CO Categorical finding tool.

Thank you and please do not hesitate to reach out with any questions or clarifications.

Best,

Lindsay

Lindsay Wickersham (she/hers) | 415-947-4192

Physical Scientist | Planning Section (AIR-2-1) | Air and Radiation Division | US EPA - Region 9

From: Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Sent: Thursday, February 1, 2024 11:24 AM

To: bchenausky [azdot.gov](mailto:bchenausky@azdot.gov) <bchenausky@azdot.gov>; Tim Franquist <tfranquist@azmag.gov>; Wickersham, Lindsay (she/her/hers) <wickersham.lindsay@epa.gov>; Johanna.Kuspert@maricopa.gov; Transportationconformity <transportationconformity@azdeq.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krodriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic <iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <dgiles@azmag.gov>; Perez, Idalia (she/her/hers) <Perez.Idalia@epa.gov>; Meek, Clifton <meek.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Oconnor, Karina (she/her/hers) <OConnor.Karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: RE: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

FHWA reviewed the consultation documents for the Warner Road project and has one comment – the CO categorical finding tool we need to be redone with 2025 instead of 2040 since it is the opening year. Thanks, Rebecca

From: Beverly Chenausky <bchenausky@azdot.gov>

Sent: Wednesday, January 17, 2024 11:18 AM

To: Tim Franquist <tfranquist@azmag.gov>; Wickersham, Lindsay (she/her) <wickersham.lindsay@epa.gov>; Johanna Kuspert (AQD) <Johanna.Kuspert@maricopa.gov>; Transportationconformity <transportationconformity@azdeq.gov>; Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krodriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic <iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <dgiles@azmag.gov>; Perez, Idalia (she/her/hers) <perez.idalia@epa.gov>; Clifton Meek <meek.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Karina O'Conner <oconnor.karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To All:

ADOT is presenting the following local Town of Gilbert project, **Warner Rd: Recker Rd to Power Rd**, for interagency consultation, per 40 CFR 93.105, with the recommendation that this project is not a project of Air Quality Concern and thereby will not require a quantitative PM10 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.

Additionally, ADOT has determined that the project is eligible to utilize the FHWA 2023 CO Categorical Hot-Spot Finding, refer to "Attachment A: Supporting Data for FHWA 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding" in the attached in document *T0355_Warner Road_Consultation_01172024.pdf*. 40 CFR 93.123(a)(3) states, "DOT, in consultation with EPA, may also choose to make a categorical hot-spot finding that §93.116(a) is met without further hot-spot analysis for any project described in paragraphs (a)(1) and (a)(2) of this section based on appropriate modeling."

It is requested that the consulted parties provide comments on the attached document by **February 16th, 2024**, a non-response will be interpreted as concurrence with the approach as described in the attached Consultation document.

The project team will be available for any additional discussions at ADOT's standing monthly air quality project meeting, please forward to those interested.

ADOT Transportation Conformity Coordination

Thursday, February 8 · 10:00 – 11:00am

Time zone: America/Phoenix

Google Meet joining info

Video call link: <https://meet.google.com/usc-ivuz-eof>

Or dial: (US) +1 585-667-0052 PIN: 813 049 123#

More phone numbers: <https://tel.meet/usc-ivuz-eof?pin=9640464285692>

Please let me know if you have any additional questions or need additional information.

Thank you,

Beverly T. Chenausky

Assistant Environmental Administrator

Air & Noise, Hazmat and Standards & Training

[205 South 17th Avenue](#), MD EM02

Phoenix, AZ 85007

C: 480.390.3417

azdot.gov

[Redacted signature]



Beverly Chenausky <bchenausky@azdot.gov>

Re: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

1 message

Beverly Chenausky <bchenausky@azdot.gov>

Wed, Feb 7, 2024 at 10:16 AM

To: "Wickersham, Lindsay (she/her/hers)" <wickersham.lindsay@epa.gov>

Lindsay - If this table attached works we can add it to the consultation documentation, is this what you are looking for?

On Tue, Feb 6, 2024 at 1:01 PM Wickersham, Lindsay (she/her/hers) <wickersham.lindsay@epa.gov> wrote:

Hi Beverly,

Thank you for putting these documents together and sending them to us for interagency consultation. Overall there has been major improvements in the documentation provided to us—Appendix A looks great 😊

At this time, we would like to request that the data in, "Table 1. Intersection Level of Service and Peak-Hour Volumes" also be presented in Truck ADT for our consideration. In the past EPA has used ADT or AADT to determine if a project has a significant number of diesel vehicles. We would like to see the data in this format before we can determine if this project is a project of air quality concern (POAQC) or not. We also recommend including the data in this format for future POAQC determinations.

We also agree with FHWA's comment below suggesting that 2025 be used instead of 2040 in the CO Categorical finding tool.

Thank you and please do not hesitate to reach out with any questions or clarifications.

Best,

Lindsay

Lindsay Wickersham (she/hers) | 415-947-4192

Physical Scientist | Planning Section (AIR-2-1) | Air and Radiation Division | US EPA - Region 9

From: Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Sent: Thursday, February 1, 2024 11:24 AM

To: bchenausky <bchenausky@azdot.gov>; Tim Franquist <tfranquist@azmag.gov>; Wickersham, Lindsay (she/her/hers) <wickersham.lindsay@epa.gov>; Johanna.Kuspert@maricopa.gov; Transportationconformity <transportationconformity@azdeq.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krodriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic

<iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <djiles@azmag.gov>; Perez, Idalia (she/her/hers) <Perez.Idalia@epa.gov>; Meek, Clifton <meeq.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Oconnor, Karina (she/her/hers) <OConnor.Karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: RE: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

FHWA reviewed the consultation documents for the Warner Road project and has one comment – the CO categorical finding tool we need to be redone with 2025 instead of 2040 since it is the opening year. Thanks, Rebecca

From: Beverly Chenausky <bchenausky@azdot.gov>

Sent: Wednesday, January 17, 2024 11:18 AM

To: Tim Franquist <tfranquist@azmag.gov>; Wickersham, Lindsay (she/her) <wickersham.lindsay@epa.gov>; Johanna Kuspert (AQD) <Johanna.Kuspert@maricopa.gov>; Transportationconformity <transportationconformity@azdeq.gov>; Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>

Cc: Curt Overcast <estreetcmo@gmail.com>; Angela Newton <angie@newtonec.com>; Simpkins, Jennifer <Jennifer.Simpkins@kimley-horn.com>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Katie Rodriguez <krodriguez@azdot.gov>; Joonwon Joo <jjoo@azdot.gov>; Tatum Wertin <twertin@azdot.gov>; Ivan Racic <iracic@azdot.gov>; Lisa Danka <ldanka2@azdot.gov>; Veronica Ruiz Ronquillo <vrronquillo@azdot.gov>; Dean Giles <djiles@azmag.gov>; Perez, Idalia (she/her/hers) <perez.idalia@epa.gov>; Clifton Meek <meeq.clifton@epa.gov>; Halle, Greta (FHWA) <greta.halle@dot.gov>; Karina O'Conner <oconnor.karina@epa.gov>; Chris Rodriguez <CRodriguez9@azdot.gov>

Subject: Interagency Consultation: Warner Rd: Recker Rd to Power Rd GIL-0(219)T | 0000 MA GIL T0335 01C

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To All:

ADOT is presenting the following local Town of Gilbert project, **Warner Rd: Recker Rd to Power Rd**, for interagency consultation, per 40 CFR 93.105, with the recommendation that this project is not a project of Air Quality Concern and thereby will not require a quantitative PM10 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.

Additionally, ADOT has determined that the project is eligible to utilize the FHWA 2023 CO Categorical Hot-Spot Finding, refer to "Attachment A: Supporting Data for FHWA 2023 Carbon Monoxide (CO) Categorical Hot-Spot Finding" in the attached in document *T0355_Warner Road_Consultation_01172024.pdf*. 40 CFR 93.123(a)(3) states, "DOT, in consultation with EPA, may also choose to make a categorical hot-spot finding that §93.116(a) is met without further hot-spot analysis for any project described in paragraphs (a)(1) and (a)(2) of this section based on appropriate modeling."

It is requested that the consulted parties provide comments on the attached document by **February 16th, 2024**, a non-response will be interpreted as concurrence with the approach as described in the attached Consultation document.

The project team will be available for any additional discussions at ADOT's standing monthly air quality project meeting, please forward to those interested.

ADOT Transportation Conformity Coordination

Thursday, February 8 · 10:00 – 11:00am

Time zone: America/Phoenix

Google Meet joining info

Video call link: <https://meet.google.com/usc-ivuz-eof>

Or dial: (US) +1 585-667-0052 PIN: 813 049 123#

More phone numbers: <https://tel.meet/usc-ivuz-eof?pin=9640464285692>

Please let me know if you have any additional questions or need additional information.

Thank you,

Beverly T. Chenausky

Assistant Environmental Administrator

Air & Noise, Hazmat and Standards & Training

205 South 17th Avenue, MD EM02

Phoenix, AZ 85007

C: 480.390.3417

azdot.gov

[Redacted signature]

 **Intersection ADT_Trucks_Draft_2.7.24.docx**
18K

ADOT Monthly Air Quality Coordination Meeting Agenda

Thursday, February 8th, 2024

10-11am

Google Meet

Google Meet joining info

Video call link: <https://meet.google.com/kbp-jojp-cmk>

Or dial: (US) +1 209-850-2317 PIN: 483 772 939#

More phone numbers: <https://tel.meet/kbp-jojp-cmk?pin=8376833655633>

Notes added within each agenda item.

1. WELCOME

ADOT - Beverly Chenausky, Katie Rodriguez, Tazeen Dewan, Veronica Ronquillo, Joonwon Joo

FHWA - Rebecca Yedlin, Greta Halle, Alan Hansen, George Noel, Chris Dresser

EPA - Lindsay Wickersham, Andrew Ledezma, Michael Dorantes

ADEQ - Amanda Luecker, Kamran Khan

T0335 Project Team: Suzanne Dietering, Keith Christensen (Gilbert), Jason S (Gilbert)

F0534 Project Team: Allison Fluitt (Kimley Horn), Robert Tworek (Kimley Horn), Donald Smith (Stantec), Robert Lemke (Stantec), Jennifer Simpkins (Kimley Horn)

2. REVIEW PROJECTS

Active Projects for Discussion

- **T0335: Town of Gilbert, Warner Rd: Recker Rd to Power Rd** - ADOT presented the project for consultation on 01/17/2024, and requested comments from interagency consultation partners by 02/16/2024. Open discussion with the project team to answer any questions on active consultation.
 - Consultant for project confirmed they will make change to FHWA and EPA comment on change to open year to 2025 on the needed tables (Intersection ADT and Truck Volumes Table)

ADOT Monthly Air Quality Coordination Meeting Agenda

- *EPA had requested additional traffic information for the truck numbers. EPA has looked at the project and truck traffic data, and preliminary information looks to confirm that it is not a project of air quality concern - EPA will send a formal comment email to document review of this.*
- *Consultant (Curt Overcast) recommended that they update the table with the updated traffic information for the consultation documents and send that out as part of the comment resolution for the "Intersection ADOT and Truck Volumes table"*
- *ADOT communicated that at the end of the comment review period (02/16/24), ADOT will send out the revised consultation documents to confirm changes made and addressing of comments.*
- **F0534 - Douglas International Commercial Port-Of-Entry Connector Road Study** - *ADOT held a project specific breakout meeting on 12/7/2023 to discuss regional and project level conformity information, sent out interagency consultation on 12/12/2023 with a request for comments by 01/12/2024. Review initial ADOT comment responses to interagency consultation documents, and discuss next steps of the project.*
 - *Consultant (Kimley Horn) gave a preview of the overview of the initial comment responses. ADOT and consultants have done a thorough review of options for data to supplement the limited 1990 baseline year existing data, and have only found NEI data to be acceptable.*
 - *Discussion of analysis years - previous comment on the 1990 baseline year. Goal from the project team was to supplement/extrapolate data from traffic analysis from NEI data and other sources into the MOVES mode and explain thoroughly the methodology in the analysis. Looking for feedback from the team if it is acceptable to move forward with the supplemental data approach for the modeling effort - EPA communicated that the consultant can send an outline with this approach for feedback and outline all of the inputs and data sources to be used to confirm.*
 - **Action Item:** *ADOT to prepare methodology outline for baseline 1990 data inputs and provide to interagency partners*

ADOT Monthly Air Quality Coordination Meeting Agenda

- *FHWA understands challenges from local outdated data and that approach is going to extrapolate data to fill in gaps - as long as methodology is outlined and is clear and all agree on that then it should be acceptable.*
- *FHWA asked about NEI data and what methodology is going to be used for road dust data - EPA was going to look into this and confirm if we need to use the most up to date data when calculating road dust.*
- *FHWA and EPA want to see the methodology and data available first to confirm that 1990 data year is still acceptable, and make sure the methodology makes clear the difference on the road dust data versus of the unpaved and paved road data.*
- *FHWA comment on data collection for only weekday traffic for annual inventory - asked how the team is summarizing this in the documentation. Consultant/ADOT responded that weekday inventory data was available through standard traffic information - FHWA recommended doing a full annual inventory that is inclusive of the weekends and not just weekdays. Consultant will add this information for modeling.*
 - **Action Item:** *ADOT to address weekend days in modeling approach*
- *Consultant summarized rest of comment resolutions have been relatively straightforward - looking for feedback on additional comments or questions on comment resolution by 2/16/2024*
 - **Action Item:** *Interagency consultation groups to provide comments on comment resolution document by 02/16/2024.*
- *ADOT will be scheduling an interagency meeting to discuss the methodology for baseline 1990 data question and other questions for this specific project for the end of February 2024.*
 - **Action Item:** *ADOT to schedule project specific breakout meeting, will send poll for times in next few weeks*

3. PROCESS/PROGRAM UPDATES

- a. ADOT in process of updating consultation template forms for AERMOD changes

4. OPEN DISCUSSION & NEXT STEPS

ADOT Monthly Air Quality Coordination Meeting Agenda

a. 327 MOU Projects

i.

Project Number	Name/Location	Project Website Link	Project Status/Timing
H6870	SR 303 Loop – MC85- Van Buren Street	Loop 303: MC 85 to Van Buren Street Improvements Department of Transportation (azdot.gov)	ADOT is currently working on EA Re-Evaluation documentation, including re-determination of conformity based on final design. Original NEPA determination and conformity approval was approved in 2018. No major changes to the scope identified in original EA have occurred. ADOT completing review of schedule and design.
F0561*	SR 303: Lake Pleasant Parkway - 51st Ave	Loop 303, Lake Pleasant Parkway to I-17 Improvements Department of Transportation (azdot.gov)	ADOT is still working through preliminary traffic analysis and reports needed for air quality and other environmental analysis for the project. Interagency consultation estimated - Summer 2024 (tentative)
F0562*	SR 303: 51st Ave - I-17	Loop 303, Lake Pleasant Parkway to I-17 Improvements Department of Transportation (azdot.gov)	ADOT is still working through preliminary traffic analysis and reports needed for air quality and other environmental analysis for the project. Interagency consultation estimated - Summer 2024 (tentative)
T0359	City of Mesa, Elliot Road: East Maricopa Floodway to Ellsworth Road	N/A	ADOT has received initial draft consultation documents from consultant, and is evaluating draft internal traffic report information.

ADOT Monthly Air Quality Coordination Meeting Agenda

			Interagency consultation expected to start March 2024 (tentatively); pending final details on design and traffic data from the City
--	--	--	--------------------------------------------------------------------------------------------------------------------------------------------

- b. Are there any project barriers and/or additional information needed from 327 MOU Monitoring Spreadsheet?
- c. Are there any other project specific breakout meetings that were not discussed?
- d. Review of any action items or follow up items for next monthly meeting