ARIZONA DEPARTMENT OF TRANSPORTATION

Arizona Department of Transportation

Environmental Planning

Final Project-Level Particulate Matter (PM_{10}) Consultation Document

Thornton Road Widening Phase III

Federal Project No. CSG-0(214)T
ADOT Project No. 0000 PN CSG T0530 01C

June 9, 2025

(No changes from the May 7th Draft Version)

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. 326 and a Memorandum of Understanding dated December 20, 2023, and executed by FHWA and ADOT.

Project-Level Particulate Matter Interagency Consultation

Project Setting and Description

The City of Casa Grande (Pinal County), in coordination with the Arizona Department of Transportation (ADOT) is planning a roadway widening project on Thornton Road. The project includes widening Thornton Road for about one mile between Peters Road and State Route (SR) 84 (Gila Bend Highway).

Thornton Road is a paved road consisting of three travel lanes (two southbound lanes and one northbound lane). There are designated left and right-turn lanes at Ash Avenue, Peters Road and at several commercial access points throughout the corridor. Curb, gutter, and sidewalks are present where Thornton Road intersects with SR 84 and Peters Road. There are traffic signals at the intersections of SR 84 and Peters Road, but no intersection improvements are proposed as part of the project.

The purpose of the project is to widen Thornton Road to add an additional northbound travel lane to increase traffic capacity and improve operational efficiency and safety. The project would be constructed within the City of Casa Grande right-of-way (ROW). No new ROW is anticipated, but temporary construction easements will be required from private lands for construction access.

The project location is shown in **Figure 1,** and the proposed alignment is shown in Figure **2**. The proposed project is in Pinal County currently designated as a nonattainment area for the National Ambient Air Quality Standards (NAAQS) for particulate matter less than or equal to ten microns in diameter (PM_{10}).

The primary sources of PM_{10} in the Pinal County nonattainment area include dust from unpaved roads, windblown dust, and construction activities. Agricultural practices, especially those involving ground disturbance also contribute to PM_{10} emissions.

The project is included in the updated Sun Country Metropolitan Planning Organization (SCMPO) FY 2023 – 2027 Transportation Improvement Program (Thornton Road Phase III) and the Regional Transportation Plan (RTP) 2050 Update approved by the SCMPO Executive Board on January 14, 2025. On February 28, 2025, FHWA made a Finding of Conformity with respect to the updated SCMPO TIP and the RTP 2050 Update.

Figure 1. Project Location Map

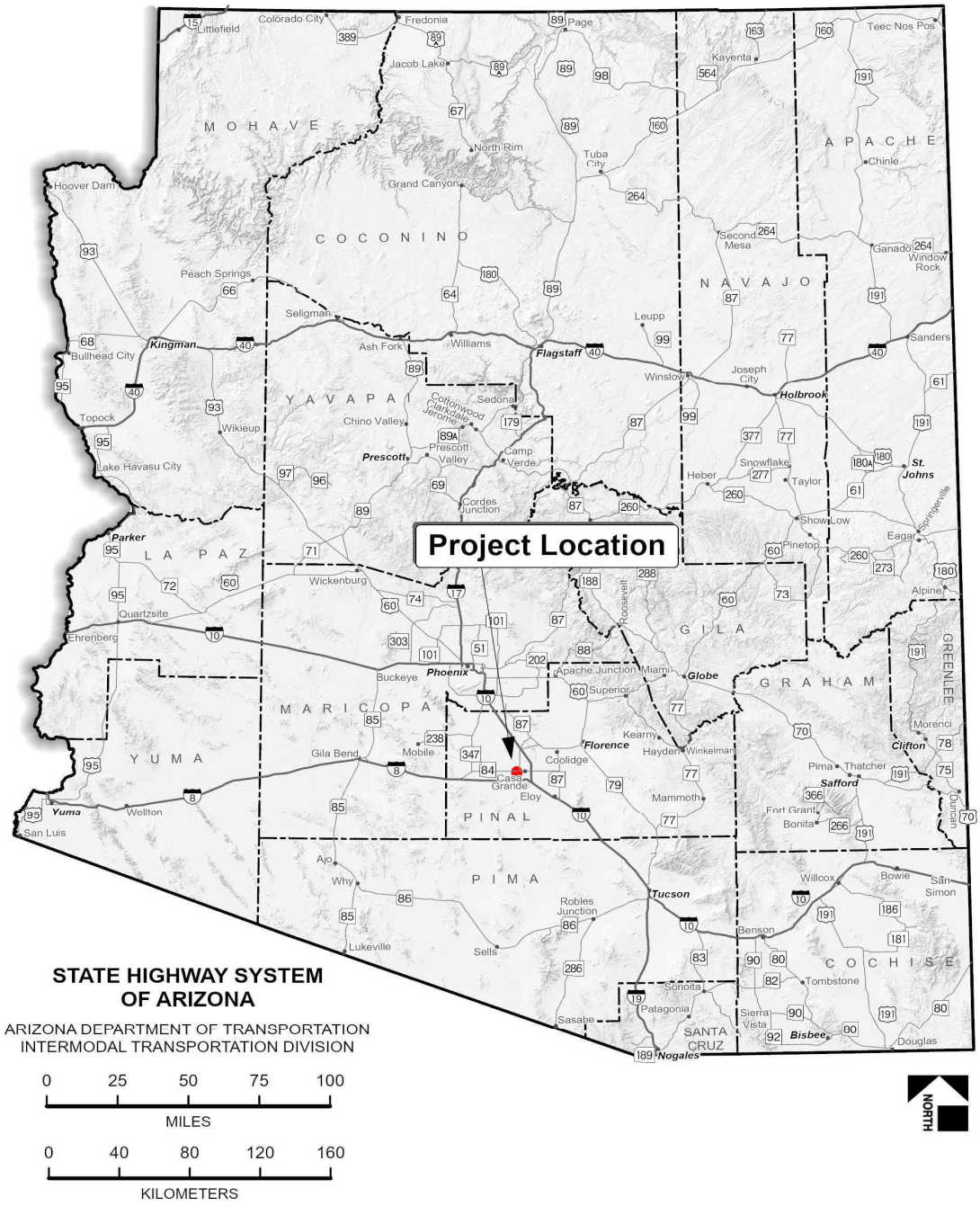
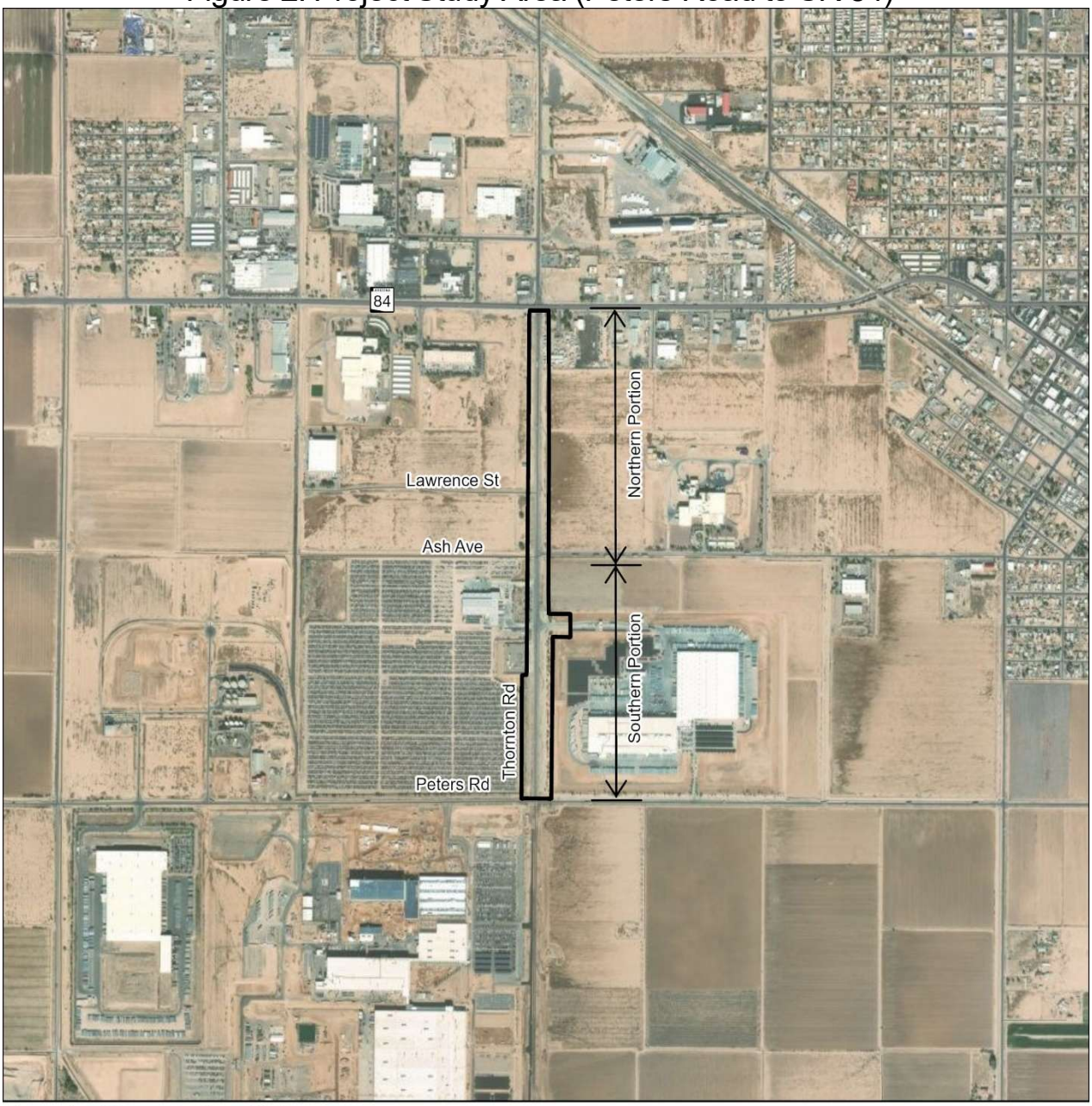


Figure 2. Project Study Area (Peters Road to SR 84)



Source: Aerial Photography, Maxar (2020)

Key

Project Area

Miles
0 0.5

NORTH

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 PM_{10} 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 of 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 *PM2.5 and PM10 Hot-Spot Analyses in Project-Level Transportation Conformity Determinations for the New PM2.5 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.

Since the issuance of this rulemaking, the Office of Transportation and Air Quality issued additional clarification (EPA-420-F-18-011 June 2018) identifying additional examples that are not projects of air quality concern. “For example, the following projects typically do not involve “a significant number of diesel vehicles” or “a significant increase in the number of diesel vehicles” as described in 40 CFR 93.123(b)(1), and thus typically would not need a PM2.5 or PM10 hot-spot analysis:
• New HOV lanes and ramp HOV lanes which do not involve a “a significant number of diesel vehicles” or “a significant increase in the number of diesel vehicles” as described in 40 CFR 93.123(b)(1);

- Bus rapid transit projects where the buses are non-diesel, (e.g., CNG buses);
- New transit stations or transit lines with no diesel vehicles; and
- Light rail projects powered by electricity."

Based on the project types listed above, this project would not be considered a project 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 1, under 2025 Existing Conditions the average annual daily traffic (AADT) volumes on Thornton Road between Peters Road and SR 84 in the project corridor are less than 7,500 vehicles per day (vpd) in both directions and total truck volumes (medium-trucks and heavy-trucks) are about 520 trucks per day. Under the 2050 Build Alternative (that is, with the addition of a northbound travel lane on Thornton Road), AADT volumes are less than 14,000 vpd and total truck volumes are less than 1,000 trucks per day.

Compared to 2025 Existing Conditions, the total truck AADT increases by less than 450 trucks per day in both directions on Thornton Road as a result of the project. In addition, the total truck volumes shown in Table 1 include both medium- and heavy- duty trucks, not all of which would be diesel-fueled. The combined medium- and heavy-duty truck AADT represents a worst-case condition 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 – The proposed project adds an additional travel lane between Peters Road and SR 84 (about one mile); there are no intersection improvements (that is, no added capacity) at either the Peters Road or SR 84 intersections as a result of this project.

As shown in Table 1, total truck volumes (medium-trucks and heavy-trucks) increase by less than 500 trucks per day on Thornton Road in 2050 as a result of the project.

The total truck volumes on Thornton Road 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.

Table 1. Average Annual Daily Traffic and Truck Volumes													
	2025 Existing				2050 No-Build				2050 Build				Total Truck AADT Difference (Build minus No-Build)[1]
Roadway Segment	AADT	Total Truck AADT (7%)	MT Volume (1%)	HT Volume (6%)	AADT	Total Truck AADT (7%)	MT Volume (1%)	HT Volume (6%)	AADT	Total Truck AADT (7%)	MT Volume (1%)	HT Volume (6%)	
Thornton Road: Peters Road to SR 84 (northbound)	3,747	262	37	225	6,948	486	69	417	6,948	486	69	417	0
Thornton Road: Peters Road to SR 84 (southbound)	3,655	256	37	219	6,776	474	68	407	6,776	474	69	417	0

[1] Proposed project improves roadway geometry from a three-lane to a four-lane roadway. Traffic volumes for the No-Build and Build alternatives are the same as no additional traffic generators are anticipated as a result of the project.

Source: Memo from Scott Kelly, Greenlight Traffic Engineering to Clark Clatanoff, Horrocks Engineering regarding Thornton Road Traffic Study Memo; Peters Road to State Route (SR) 84 (April 15, 2025). Appendix

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, total traffic volumes (both directions) on Thornton Road are less than 14,000 AADT (Table 1). The increase in diesel-fueled truck volumes due to the project are also low; less than 500 AADT compared to 2023 Existing Conditions 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 PM_{10} hot- spot analysis (71 FR 12491). The proposed project 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.” The addition of a northbound travel lane on Thornton Road between Peters Road and SR 84 is NOT of Air Quality Concern and will not require a PM hot-spot analysis.

Appendix: Traffic Memo (Table1)

Greenlight Traffic Engineering

April 15, 2025

Mr. Clark Clatanoff
Sr. Transportation Engineer/Sr. Project Manager
Horrocks
2600 N Central Ave, Suite 550
Phoenix, AZ 85004

Re: Thronton Road Traffic Study Memo | Traffic Engineering Services
Thornton Road, Peters Road to State Route (SR) 84, Casa Grande, AZ

1. Overview

Greenlight Traffic Engineering, LLC (Greenlight) has prepared this traffic study memo to present the roadway segment analysis results for Thornton Road, Peters Road to SR 84 (Corridor) in Casa Grande, Arizona. This traffic study analyzed roadway segment level of service (LOS) along the Corridor. The purpose of this report is to document the findings of the traffic study conducted to satisfy Arizona Department of Transportation (ADOT) environmental requirements. This traffic study evaluated operations for the Corridor under the existing 2-lane configuration for Year 2025 Existing and proposed 4-lane configuration for Year 2050 No Build, and Year 2050 Build conditions.

Figure 1 shows the study area roadway network.

Figure 1: Study Area

2. Analysis Methodology

Arterial LOS was used to evaluate the operational efficiency and quality of traffic flow along the Corridor. Arterial LOS is categorized into six levels, ranging from LOS A (representing free-flow conditions with minimal delays) to LOS F (indicating severe congestion and unstable traffic flow).

Arterial LOS is calculated based on the average control delay per vehicle (measured in seconds) at signalized intersections along the corridor. This delay accounts for factors such as signal timing, traffic volumes, and intersection capacity. The results are compared against thresholds defined with Highway Capacity Manual 2000 (HCM 2000). The control delay thresholds for different LOS classifications are shown in Table 1.

Table 1: Arterial LOS and Threshold Values

LOS	Average Travel Speed (ATS) as % of Free-Flow Speed (FFS)
A	≥ 85% of FFS
B	67% – 85% of FFS
C	50% – 67% of FFS
D	40% – 50% of FFS
E	30% – 40% of FFS
F	< 30% of FFS

3. Existing Roadways

Thornton Road is a 3-lane undivided roadway with one lane in the northbound direction and two lanes in the southbound direction from Peters Road to SR 84. It widens to a 4-lane roadway with two lanes in the southbound direction, one lane in the northbound direction and a Two-Way Left-Turn Lane (TWLTL) for approximately 1,300 feet north of SR 84. The existing cross section primarily consists of pavement with a dirt shoulder. There are no dedicated bicycle lanes. The posted speed limit is 35 miles per hour (mph). Thronton Road is classified as a Minor Arterial based on the City of Casa Grande's 2030 General Plan.

4. Future Geometry

Thornton Road is expected to be widened to a 4-lane roadway with two lanes in each direction between Peters Road and SR 84.

5. Operational Analysis

4.1 Geometric Alternative

The City is proposing the addition of a one-through lane in the northbound direction on the Corridor to make it a 4-lane roadway between Peters Road and SR 84. Arterial LOS performance was analyzed under the following scenarios:

4.1.1 Year 2025 Existing

Thornton Road as a 2-lane cross section was analyzed under Year 2025 existing conditions. Peak hour volumes at Thronton Road/SR 84 were collected on April 1, 2021, by Horrocks. Peak hour volumes at Thronton Road/Peters Road were collected on April 25, 2024, by Greenlight. These peak hour volumes were grown with 2.5% compounding growth rate for each year to obtain the Year 2025 Existing volumes used in the analysis.

4.1.2 Year 2050 No Build

Thornton Road as a 2-lane cross section was analyzed Year 2050 No-Build conditions. In 2021, the City performed an evaluation of the impacts of the Lucid Phase 2 project to evaluate the need for additional infrastructure improvements to support the heavy directional traffic that would occur with Lucid factory shift work. Peak hour volume estimates were developed for various intersections along Thornton Road. Volumes within the previous City-led Lucid Phase 2 study were used as the basis for Year 2050 No-Build volumes. These peak hour volumes were grown with 2.5% compounding growth rate for each year to obtain the Year 2050 Existing volumes used in

the analysis. To maintain consistency along the corridor, volume balancing between intersections was performed to ensure directional continuity.

4.1.1 Year 2050 Build

Thornton Road as a 4-lane cross section was analyzed Year 2050 Build conditions. In 2021, the City performed an evaluation of the impacts of the Lucid Phase 2 project to evaluate the need for additional infrastructure improvements to support the heavy directional traffic that would occur with Lucid factory shift work. Peak hour volume estimates were developed for various intersections along Thornton Road. Volumes within the previous City-led Lucid Phase 2 study were used as the basis for Year 2050 Build volumes. These peak hour volumes were grown with 2.5% compounding growth rate for each year to obtain the Year 2050 Existing volumes used in the analysis. To maintain consistency along the corridor, segment balancing was applied between intersections to align northbound and southbound traffic volumes and ensure directional continuity.

4.2 ADOT Average Annual Daily Traffic and Truck Percentages

ADOT Average Annual Daily Traffic (AADT) data for the Corridor were obtained from the ADOT Traffic Data Management System (TDMS). Year 2021 volumes were the latest available AADT available on the ADOT TDMS. To calculate AADT for the Year 2025 Existing and Year 2050 No Build & Build conditions, Year 2021 AADT data were grown using a 2.5% compounding growth rate. It should be noted that the calculated AADT volumes were not used in the Arterial LOS analysis for the Corridor, as the Arterial LOS evaluation relies on peak hour volumes, as previously stated.

The heavy vehicle percentages along the corridor are unknown. However, based on the growth of industrial parcels around the study area, a 1% medium truck percentage and 6% heavy vehicle percentage were assumed throughout the corridor to be conservative. This assumed heavy vehicle percentage was utilized in evaluating the Arterial LOS.

The AADT from ADOT TDMS and the assumed heavy truck percentages are presented in Table 2

Table 2: AADT and Truck Percentages

Roadway Segment	Direction	2021	2025 Existing			2050 No Build & Build		
		AADT	AADT	Medium Trucks (%)	Heavy Trucks (%)	AADT	Medium Trucks (%)	Heavy Trucks (%)
Thornton Rd, Peters Rd to SR 84	Northbound	3,395	3,747	1	6	6,948	1	6
	Southbound	3,311	3,655	1	6	6,776	1	6

4.3 Arterial Level of Service Analysis

The Arterial LOS for the Year 2025 Existing, Year 2050 No Build, and Year 2050 Build conditions along the Corridor are shown in Table 3.

Table 3: Arterial LOS

Direction	Cross Section	2025 Existing		2050 No-Build		2050 Build	
		AM Peak LOS (Delay)	PM Peak LOS (Delay)	AM Peak LOS (Delay)	PM Peak LOS (Delay)	AM Peak LOS (Delay)	PM Peak LOS (Delay)
Northbound	Peters Rd	D	C	D	F	D	F
	SR 84	B	D	C	F	C	F
	Total	C	D	C	F	C	F
Southbound	SR 84	E	F	F	F	F	F
	Peters Rd	B	A	F	B	F	B
	Total	C	D	F	F	F	F

As shown in Table 3, there is not expected to be a significant difference between the No Build and Build scenarios, as no new capacity was added to the intersections at the ends of the Corridor.

6. Conclusion

Based on the Arterial LOS analysis results, there is not expected to be a significant difference between the No Build and Build scenarios along the Thornton Road corridor.

Sincerely,
Greenlight Traffic Engineering, LLC

Scott Kelley, PE, PTOE
Principal/Senior Project Manager
scottk@greenlightte.com
(602) 499-1339

Attachments:

A – Traffic Volumes
B – Synchro Results

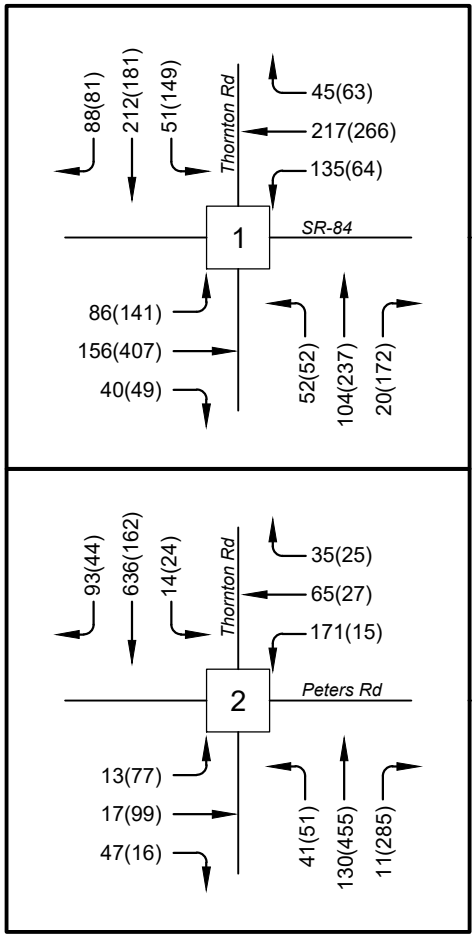
ATTACHMENTS

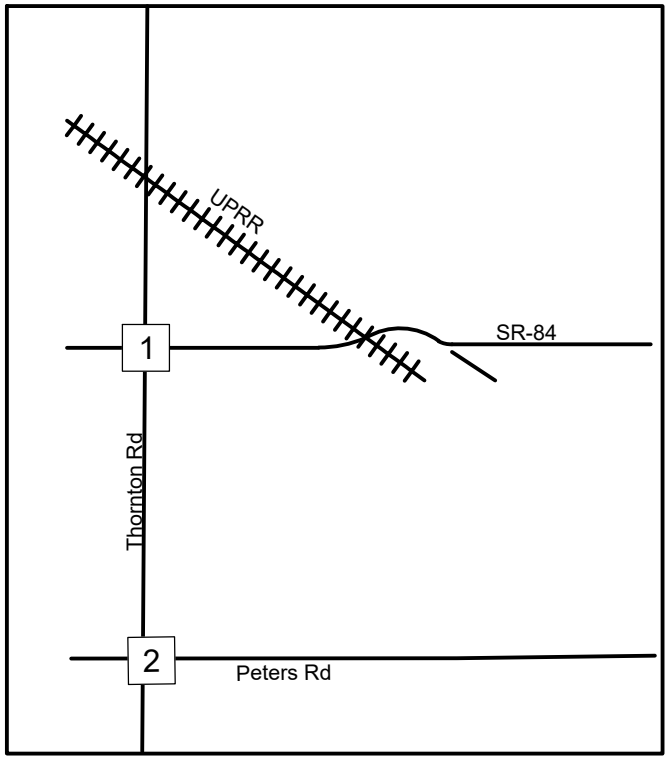
LEGEND

XX(YY) AM(PM) Peak Hour Volume

X Study Intersection

Movements





Greenlight Traffic Engineering	DESIGNED BY: RB DRAWN BY: RB CHECKED BY:SMK DATE: 4/14/2025	YEAR 2025 PEAK HOUR TRAFFIC VOLUMES THORNTON ROAD STUDY CASA GRANDE, AZ	EXHIBIT A

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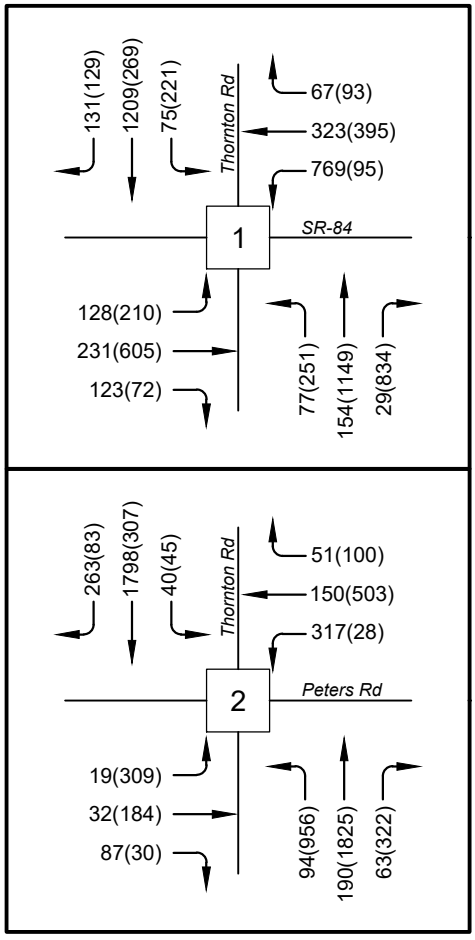
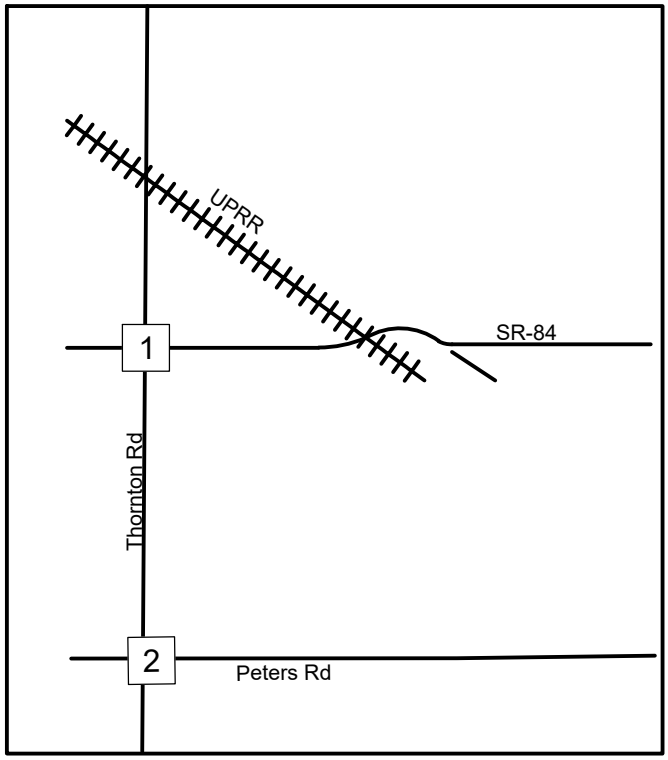
LEGEND

XX(YY) AM(PM) Peak Hour Volume

X Study Intersection

Movements





Greenlight Traffic Engineering	DESIGNED BY: RB DRAWN BY: RB CHECKED BY:SMK DATE: 4/14/2025	YEAR 2050 PEAK HOUR TRAFFIC VOLUMES THORNTON ROAD STUDY CASA GRANDE, AZ	EXHIBIT A

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Arterial Level of Service: NB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	I	50	29.8	14.6	44.4	0.33	26.5	D
SR 84	I	50	72.3	29.3	101.6	1.00	35.6	B
Total	I		102.1	43.9	146.0	1.33	32.8	C

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	III	35	33.4	60.3	93.7	0.28	10.7	E
Peters Rd	III	30	120.5	19.0	139.5	1.00	25.9	B
Total	III		153.9	79.3	233.2	1.28	19.8	C

Arterial Level of Service: NB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	II	45	31.4	19.8	51.2	0.33	23.0	C
SR 84	II	45	80.4	109.2	189.6	1.00	19.1	D
Total	II		111.8	129.0	240.8	1.33	19.9	D

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	II	35	30.6	101.6	132.2	0.28	7.6	F
Peters Rd	II	45	80.4	13.8	94.2	1.00	38.4	A
Total	II		111.0	115.4	226.4	1.28	20.4	D

Arterial Level of Service: NB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	I	50	29.8	25.8	55.6	0.33	21.2	D
SR 84	I	50	72.3	42.0	114.3	1.00	31.6	C
Total	I		102.1	67.8	169.9	1.33	28.2	C

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	III	35	33.4	2164.7	2198.1	0.28	0.5	F
Peters Rd	III	30	120.5	286.0	406.5	1.00	8.9	F
Total	III		153.9	2450.7	2604.6	1.28	1.8	F

Arterial Level of Service: NB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	II	45	31.4	983.3	1014.7	0.33	1.2	F
SR 84	II	45	80.4	2126.0	2206.4	1.00	1.6	F
Total	II		111.8	3109.3	3221.1	1.33	1.5	F

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	II	35	30.6	357.6	388.2	0.28	2.6	F
Peters Rd	II	45	80.4	26.0	106.4	1.00	34.0	B
Total	II		111.0	383.6	494.6	1.28	9.3	F

Arterial Level of Service: NB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	I	50	29.8	25.8	55.6	0.33	21.2	D
SR 84	I	50	72.3	42.0	114.3	1.00	31.6	C
Total	I		102.1	67.8	169.9	1.33	28.2	C

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	III	35	33.4	2164.7	2198.1	0.28	0.5	F
Peters Rd	III	30	120.5	286.0	406.5	1.00	8.9	F
Total	III		153.9	2450.7	2604.6	1.28	1.8	F

Arterial Level of Service: NB Thorton Rd

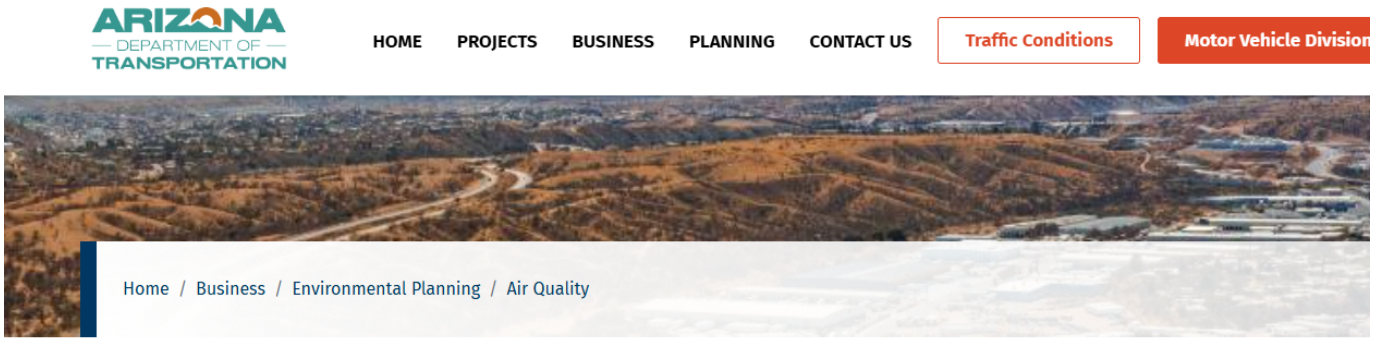
Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
Peters Rd	II	45	31.4	983.3	1014.7	0.33	1.2	F
SR 84	II	45	80.4	2126.0	2206.4	1.00	1.6	F
Total	II		111.8	3109.3	3221.1	1.33	1.5	F

Arterial Level of Service: SB Thorton Rd

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
SR 84	II	35	30.6	357.6	388.2	0.28	2.6	F
Peters Rd	II	45	80.4	26.0	106.4	1.00	34.0	B
Total	II		111.0	383.6	494.6	1.28	9.3	F

Appendix: Interagency Consultation and Public Review

Public Review (No Comments Received)



Air Quality

The ADOT Air Quality Group works to enhance air quality through congestion mitigation, air quality programs and National Environmental Policy Act (NEPA) planning activities to implement provisions required in the Clean Air Act to meet National Ambient Air Quality Standards throughout Arizona. (EPA Green Book)

Congestion Mitigation / Transportation Contr
Guidance - Air Quality
Motor Vehicle Emissior
Project Development -
Transportation Conform

Air Quality Documents Under Review

Documents for review will be posted below to provide reasonable public access to technical and policy information considered by the agency for transportation conformity determinations, and comments can be directed to ADOT Air Quality Staff.

- Project Conformity Level Consultation - SR 24, SR 202L (Santan) – Ironwood Drive, comments requested by June 20th, 2025.
- Project Conformity Level Consultation - Casa Grande, Thornton Rd Widening, comments requested by June 6th, 2025.
- Draft Air Quality Report for Interstate 10/Koli Road Traffic Interchange Study
- Refer to the "Transportation Conformity" tab for prior documents.
- Refer to the "Project Development- Air Quality" tab for consultant resources and instructions.

Air Quality Agency Contacts

Gmail ADOTAirNoise - ADOT <adotairnoise@azdot.gov>

Re: Interagency Consultation: Thornton Road Widening Phase III CSG-0(214)T | 0000 PN CSG T0530 01C

1 message

ADOTAirNoise - ADOT <adotairnoise@azdot.gov> Mon, Jun 9, 2025 at 10:25 AM
To: Beverly Chenausky <bchenausky@azdot.gov>
Cc: Transportationconformity <transportationconformity@azdeq.gov>, Irene Higgs <ihiggs@scmpo.org>, "Wickersham, Lindsay (she/her)" <wickersham.lindsay@epa.gov>, Anu Jain <anu.jain@pinal.gov>, Caitlyn Zaremba <zaremba.caitlyn@azdeq.gov>, Julia Manobianco <jmanobianco@azdot.gov>, Chinwe Iwuchukwu <ciwuchukwu@azdot.gov>, Clifton Meek <meek.clifton@epa.gov>, Karina O'Conner <oconnor.karina@epa.gov>, "Ledezma, Andrew (he/him/his)" <Ledezma.Andrew@epa.gov>, William Randolph <wrandolph@azdot.gov>, deitel@casagrandeaz.gov, jbottjen@scmpo.org

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) .

Thanks, Beverly

On Wed, May 7, 2025 at 12:24 PM Beverly Chenausky <bchenausky@azdot.gov> wrote:

> To all:
> ADOT, in coordination with city of Casa Grande, is presenting the following project, **Thornton Road Widening Phase III**, 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 PM10 hot-spot analysis. ADOT is requesting responses to the attached document by **June 6th, 2025**; a non-response will be interpreted as concurrence that the project is not a project of air quality concern and does not require a hot-spot analysis. If any consulted party believes this project should be treated as a project of air quality concern that requires a Quantitative PM hot-spot analysis, please document the appropriate section under 40 CFR 93.123 (b) that applies to the project and describe why the project should be treated as a project of air quality concern.
>
> ARIZONA DEPARTMENT OF TRANSPORTATION
>
> **Beverly Chenausky**
> Assistant Environmental Administrator
> **ENVIRONMENTAL PLANNING**
>
> **205 South 17th Ave.**
> **Phoenix AZ 85007**
> 480.390.3417 | azdot.gov
>
> *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. 326 and a Memorandum of Understanding dated December 20, 2023, and executed by FHWA and ADOT.*

Gmail

Beverly Chenausky <bchenausky@azdot.gov>

RE: Interagency Consultation: Thornton Road Widening Phase III CSG-0(214)T | 0000 PN CSG T0530 01C

2 messages

Wickersham, Lindsay <wickersham.lindsay@epa.gov> Fri, Jun 6, 2025 at 2:29 PM
To: Beverly Chenausky <bchenausky@azdot.gov>
Cc: Transportationconformity <transportationconformity@azdeq.gov>, Irene Higgs <ihiggs@scmpo.org>, Anu Jain <anu.jain@pinal.gov>, Caitlyn Zaremba <zaremba.caitlyn@azdeq.gov>, Jason Hafner <jhafner@scmpo.org>, Julia Manobianco <jmanobianco@azdot.gov>, Chinwe Iwuchukwu <ciwuchukwu@azdot.gov>, ADOTAirNoise - ADOT <adotairnoise@azdot.gov>, "Meek, Clifton" <meek.clifton@epa.gov>, "Oconnor, Karina" <OConnor.Karina@epa.gov>, "Ledezma, Andrew" <Ledezma.Andrew@epa.gov>, William Randolph <wrandolph@azdot.gov>, "deitel@casagrandeaz.gov" <deitel@casagrandeaz.gov>

Thank you Beverly for these responses. After considering them and the project documentation shared with us on 5/7/25, we agree that this is not a project of air quality concern and will not require a PM hot spot analysis.

Have a good weekend,

Lindsay

Lindsay Wickersham | 415-947-4192

Physical Scientist | Planning Section | Air and Radiation Division | US EPA - Region 9

From: Beverly Chenausky <bchenausky@azdot.gov>
Sent: Tuesday, May 27, 2025 2:40 PM
To: Wickersham, Lindsay <wickersham.lindsay@epa.gov>
Cc: Transportationconformity <transportationconformity@azdeq.gov>; Irene Higgs <ihiggs@scmpo.org>; Anu Jain <anu.jain@pinal.gov>; Caitlyn Zaremba <zaremba.caitlyn@azdeq.gov>; Jason Hafner <jhafner@scmpo.org>; Julia Manobianco <jmanobianco@azdot.gov>; Chinwe Iwuchukwu <ciwuchukwu@azdot.gov>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Meek, Clifton <meek.clifton@epa.gov>; Oconnor, Karina <OConnor.Karina@epa.gov>; Ledezma, Andrew <Ledezma.Andrew@epa.gov>; William Randolph <wrandolph@azdot.gov>; deitel@casagrandeaz.gov
Subject: Re: Interagency Consultation: Thornton Road Widening Phase III CSG-0(214)T | 0000 PN CSG T0530 01C

Lindsay - here are responses to your questions, let me know if this is sufficient. Thanks

1. The horizon year 2050 traffic forecast includes the assumed buildout of Lucid with an employment of roughly 20,000 employees. Concurrently the analysis assumes the Burris Rd corridor will be built out with an overpass of the Union Pacific railroad, tying into SR 387 (Pinal Ave) north of the city airport. The Burris Rd extension is planned as the truck route for this industrial area, as a reliever to Thornton Rd between Peters Rd and Kortsen Rd; and Pinal Ave between Cottonwood Ln and the tie-in of the Burris Rd extension north of the airport. These two factors weighed into the 7% heavy truck factor along this segment of Thornton Rd.
2. The NB roadway capacity of this segment of Thornton Rd between Peters Rd and SR 84 is controlled by the signalized intersection capacity at the SR 84 intersection. This project does not include improvements to the SR 84 intersection. No improvements are envisioned at the SR 84 intersection as the future Burris Rd corridor is envisioned as a significant reliever. Conversely the city wants to see a reduction of vehicular traffic, in particular truck traffic along Thornton, Cottonwood Ln, Kortsen Rd; the Pinal/Cottonwood and Pinal/Kortsen intersections; and Pinal north of Cottonwood as it is causing travel time delays and blocking of access at driveway access to Cottonwood, Kortsen and Pinal near their intersection.

Beverly Chenausky

Assistant Environmental Administrator

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On Fri, May 16, 2025 at 12:09 PM Wickersham, Lindsay <wickersham.lindsay@epa.gov> wrote:

> Hi Beverly,
>
> Thank you for the opportunity to review the document titled, “Draft Project-Level Particulate Matter (PM10) Consultation Document” for Thornton Road Widening Phase III.
>
> At this time, we have finished our review and have the following questions on the materials provided:
>
> 1. Looking at an aerial map of the area, there appears to be quite a few industrial facilities that feed into this section of road, including a distribution center. In this conformity analysis, it is stated that 7% of ADT on this roadway is assumed to be truck traffic, however we would expect this to be more given the amount of industry located around this road. Please explain why this 7% is a conservative assumption for the number of trucks on the road for this project.
> 2. It is stated that this project will be adding a new Northbound Lane, however there is no difference in ADT from the build and no-build scenario. Why is ADT not projected to change between build and no-build scenarios despite the new lane being added?
>
> Please let us know if you have any clarifications related to our questions or if you’d like to have a call to discuss.
>
> Best,
>
> Lindsay
>
> Lindsay Wickersham | 415-947-4192
>
> Physical Scientist | Planning Section | Air and Radiation Division | US EPA - Region 9

From: Beverly Chenausky <bchenausky@azdot.gov>
Sent: Wednesday, May 7, 2025 12:24 PM
To: Transportationconformity <transportationconformity@azdeq.gov>; Irene Higgs <ihiggs@scmpo.org>; Wickersham, Lindsay <wickersham.lindsay@epa.gov>; Anu Jain <anu.jain@pinal.gov>
Cc: Caitlyn Zaremba <zaremba.caitlyn@azdeq.gov>; Jason Hafner <jhafner@scmpo.org>; Julia Manobianco <jmanobianco@azdot.gov>; Chinwe Iwuchukwu <ciwuchukwu@azdot.gov>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Meek, Clifton <meek.clifton@epa.gov>; Oconnor, Karina <OConnor.Karina@epa.gov>; Ledezma, Andrew <Ledezma.Andrew@epa.gov>; William Randolph <wrandolph@azdot.gov>; deitel@casagrandeaz.gov
Subject: Interagency Consultation: Thornton Road Widening Phase III CSG-0(214)T | 0000 PN CSG T0530 01C

To all:

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Beverly Chenausky

Assistant Environmental Administrator

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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. 326 and a Memorandum of Understanding dated December 20, 2023, and executed by FHWA and ADOT.

Beverly Chenausky <bchenausky@azdot.gov> Mon, Jun 9, 2025 at 10:27 AM
Draft

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