

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

Project Setting and Description

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being carried out by Arizona Department of Transportation (ADOT), pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated [April 16, 2019](#), and executed by the Federal Highway Administration (FHWA) and ADOT. ADOT is planning an approximately 24-mile-long project along Interstate 17 (I-17) in Maricopa and Yavapai counties, Arizona. The project will add a general-purpose lane from the Anthem Way traffic interchange (TI) to the Black Canyon City TI and add two flex lanes from the Black Canyon City TI to the Sunset Point TI (Figure 1).

I-17 in the study area is a four-lane divided, access-controlled rural freeway. From Anthem Way TI to New River TI (Milepost [MP] 229 to MP 232): I-17 is in level terrain with two general purpose lanes in each direction. From the New River TI to Black Canyon City TI (MP 232 to MP 244): I-17 is in rolling terrain with two general purpose lanes in each direction. The recommended widening of I-17 would provide an additional through lane in the northbound and southbound directions between the Anthem Way TI and the Black Canyon City TI. It would add capacity in both directions that will match the improvements already completed south of the Anthem Way TI.

The portion of the project within Maricopa County begins at approximately MP 229 at the I-17 Anthem Way TI and extends north for 13 miles to approximately MP 242, the Yavapai County line. The purpose of the project is to alleviate congestion and improve operations in the corridor.

Approximately, the first two miles of the study area (MP 229 to MP 231) is located in the Maricopa County (Phoenix) Nonattainment Area for particulates 10-microns in diameter or less (PM₁₀) and therefore this project level PM evaluation is needed with respect to only this project segment. Figure 2 shows the portion of the project that is within the PM₁₀ Nonattainment Area, as well as the Phoenix ozone (O₃) Nonattainment Area and carbon monoxide (CO) Maintenance Area. The Maricopa Association of Governments (MAG) issued the 2012 Five Percent Plan for the Maricopa County Nonattainment Area, and the Arizona Department of Environmental Quality (ADEQ) submitted it to the US Environmental Protection Agency (EPA) on May 25, 2012 and EPA approved it on May 30, 2014. The US EPA approved an updated State Implementation Plan (SIP) that addressed the 2012 Five Percent Plan on June 10, 2014. The MAG planning region for air quality covers the Phoenix metropolitan area and surrounding undeveloped land, including all of Maricopa County and a small portion of northern Pinal County, including the communities of Florence and Maricopa.

An additional conformity requirement, besides potential PM hot spot analysis, is that the project be from a conforming approved Long-Range Transportation Plan (LRTP) and approved Transportation Improvement Program (TIP) (40 CFR 93.109). The LRTP and TIP

requirements apply to all relevant pollutants, which in this case are PM₁₀ (nonattainment), CO (maintenance) and ozone (nonattainment). CO hot spot requirements are addressed in a separate companion questionnaire to this PM questionnaire.

Ozone conformity is demonstrated simply by documenting that a project is included in the latest approved LRTP and TIP. The portion of the proposed project corridor within ozone nonattainment status is the portion within Maricopa County, which is in MAG's jurisdiction. This project is listed in the MAG FY 2020-2024 Transportation Improvement Program (TIP), as Project ID 45445. The portion of the project within the O₃ Nonattainment area is also included in MAG's latest approved 2040 Regional Transportation Plan Update (MAG 2020: [2040-RTP-Update-FINAL_2-26-2020_Protected.pdf \(azmag.gov\)](#) - see Table C-1). Therefore, the project is deemed to conform with the ozone State Implementation Plan for the Phoenix ozone Nonattainment Area.

Figure 1. Project Limits Map

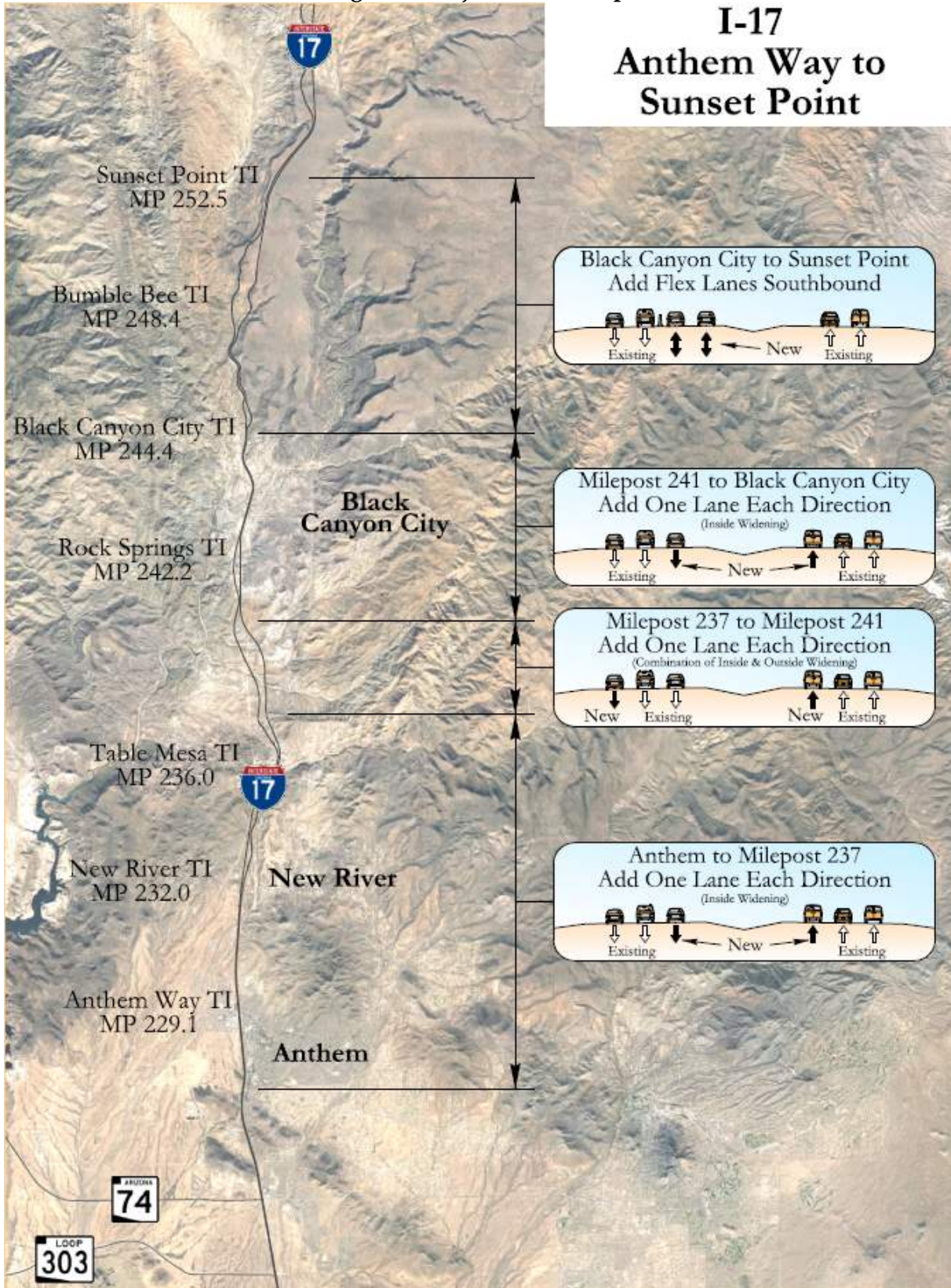
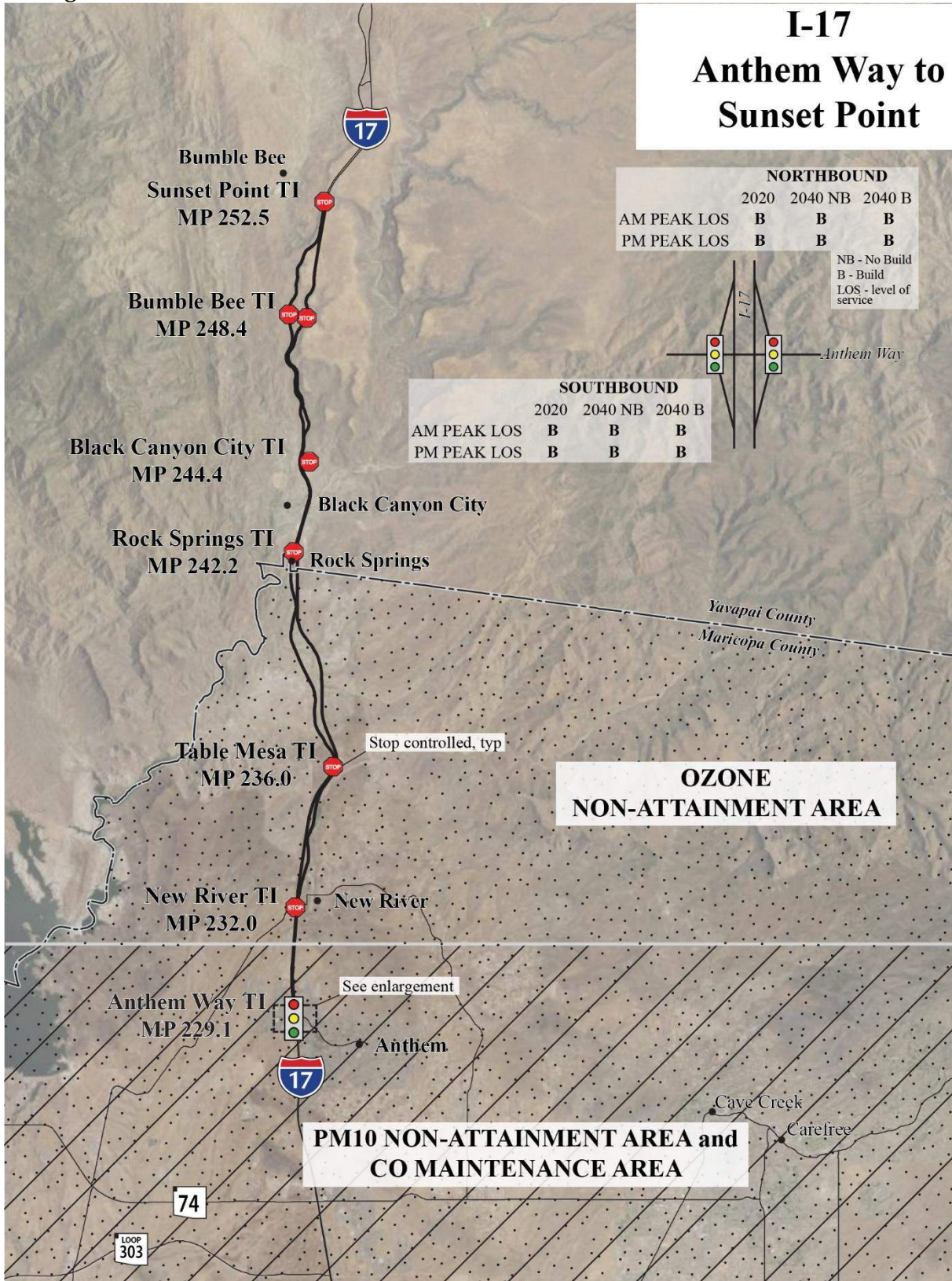


Figure 2. Nonattainment and Maintenance Areas, and Intersection Level-of-Service



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 to 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;" These examples will be used as the baseline for determining if the project is a project of air quality concern.

New Highway Capacity

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

Example: total traffic volumes $\geq 125,000$ annual average daily traffic (AADT) and truck volumes $\geq 10,000$ diesel trucks per day (8% of total traffic).

NO - This project is not a new highway project.

Expanded Highway Capacity

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

Example: the build scenario of the expanded highway or expressway causes a significant increase in the number of diesel trucks compared with the no-build scenario, truck volumes > 8% of the total traffic.

NO - This is not an expanded highway project that would cause a significant increase in the number of diesel vehicles. Table 1 summarizes the average daily traffic and truck traffic data which was provided by HDR and MAG. This project would add an additional 12 medium and heavy trucks combined, to the average daily traffic, indicating essentially a 0% change in diesel truck volumes when comparing the build to the no-build scenario. Truck volumes are assumed to grow annually, therefore 2040 will have the highest volume of trucks within the horizon period.

Table 1. Traffic Projections I-17 between Anthem Way and New River Road

	2020 Existing	2040 No-build	2040 Build	Difference from Build and No-Build
AADT Volumes	42,075	58,700	59,174	474
Diesel Truck Volume	7,845	15,234	15,246	12
% Diesel Trucks	19%	26%	26%	0%

Source: MAG Travel Demand Model; 2020, 2040 No Build, 2040 Build (July 2020).

MAG data is only available within the attainment zone. Data for the rest of the project limits, in Table 2, was obtained from the ADOT Transportation Planning website. The data in Table 2 shows that the project-induced increase in truck volume (AADT, last column) is quite low and represents only on the order of 0.1% of the total daily traffic. Thus, the project does not cause a significant increase in diesel truck traffic.

Table 2. Traffic Projections I-17 between New River Road and Sunset Point Rest Area*

Segment	2020 Existing		2040 No-Build		2040 Build		Difference from Build and No-Build	
	Total Volume	Truck Volume	Total Volume	Truck Volume	Total Volume	Truck Volume	Total Volume	Truck Volume
New River to Table Mesa	46,428	6,128	68,209	9,004	68,760	9,076	551	72
Table Mesa to Velda Rose	45,028	6,034	52,117	6,984	52,538	7,040	421	56
Velda Rose to Coldwater Canyon	36,820	5,302	49,644	7,149	50,045	7,206	401	57
Coldwater Canyon to Bumble Bee	35,650	4,528	55,722	7,7077	56,172	7,134	450	57
Bumble Bee to Sunset Point	28,377	3,689	54,760	7,119	55,202	7,176	442	57

Source: ADOT Transportation Planning website

* Freeway between New River Road and Sunset Point Rest Area is outside the PM₁₀ Nonattainment Area.

Projects with Congested Intersections

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

NO - As shown in Table 3, the 2040 Build condition for this project will not affect a congested intersection (LOS D or greater) that has a significant number of diesel trucks. Table 3 and Figure 2 show the current (2020) LOS at the Anthem Way signalized intersections (northbound ramp and southbound ramp intersections for Anthem Way) is "B" and for 2040, both the no-build and build LOS will remain at "B." Therefore, this is not a project that affects a congested intersection. In addition, Table 4 shows that this intersection does not have a significant number of diesel trucks (> 8% of total traffic), and there would be no significant change to the number of diesel trucks using these intersections.

Table 3. LOS and Delay for I-17 and Anthem Way Signalized Intersections

Interchange		AM Peak Hour LOS (Delay)			PM Peak Hour LOS (Delay)		
		2020	2040 No Build	2040 Build	2020	2040 No Build	2040 Build
Anthem Way	Northbound Ramps	B (18.8)	B (18.8)	B (18.7)	B (18.1)	B (18.7)	B (18.7)
	Southbound Ramps	B (11.2)	B (12.4)	B (12.4)	B (16.8)	B (15.8)	B (16.0)
New River Road	Northbound Ramps	* (3.8)	* (7.1)	* (7.1)	* (8.8)	* (34.3)	* (37.9)
	Southbound Ramps	* (5.7)	* (5.1)	* (5.0)	* (5.3)	* (8.3)	* (8.4)
Table Mesa Road	Northbound Ramps	* (4.3)	* (3.5)	* (2.8)	* (5.1)	* (4.7)	* (5.1)
	Southbound Ramps	* (0.0)	* (3.1)	* (0.0)	* (0.0)	* (2.6)	* (0.0)

* Intersection level-of-service is not provided for stop controlled intersections
 Delay is measured in seconds/vehicle

Table 4. Traffic Data for Anthem Way Intersection for East and West Travel

	2020 Existing	2040 No-build	2040 Build	Difference from Build and No-Build
AADT Volumes	22,389	25,906	26,047	141
Diesel Truck Volume	1,025	1,071	1,058	-13
% Diesel Trucks	5%	4%	4%	0%

Source: MAG Travel Demand Model; 2020, 2040 No Build, 2040 Build.

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 project does not involve construction of a new bus or intermodal terminal.

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 project does not involve an existing bus or intermodal terminal.

Projects Affecting PM Sites of Violation or Possible Violation

Does the project affect locations, areas or categories of sites that are identified in the PM₁₀ or PM_{2.5} applicable plan or implementation plan submissions, as appropriate, as sites of violation or potential violation?

NO – The PM₁₀ State Implementation Plan (SIP) did not identify any specific sites or potential sites of violation. Therefore, no specific sites or potential sites of violation are identified.

POAQC Determination

The I-17 Improvements project is not a Project of Air Quality Concern. The project complies with and will not interfere with the implementation of any control measures included in the approved MAG region SIP(s). The project would not create LOS D conditions or worsen conditions at intersections with a significant number of truck/diesel vehicles, and the project would not significantly increase the number of diesel trucks in the 2040 design year compared to the no-build. The project does not create an air quality concern but improves circulation and LOS which contributes to an improvement in both air quality and congestion.

Therefore, ADOT is presenting this project for interagency consultation per 40 CFR 93.105, as a project that is NOT of Air Quality Concern and thereby will not require a PM₁₀ hot-spot analysis. While this project does not require a hot-spot analysis, other conformity provisions apply and will be addressed in the project clearance.

Interagency Consultation Results

On March 3, 2021 ADOT, provided a copy of this questionnaire, to the following consultation parties, FHWA, EPA, MAG, Arizona Department of Environmental Quality (ADEQ), and Maricopa County Air Quality Department as the local air agencies in Maricopa County. There were a few minor corrections made to the consultation document on March 19, 2021 ADOT provided the changes as noted on page 1, 2 of this document in blue. There were no objections to the project determination and on March 19, 2021 ADOT concluded Interagency Consultation by notifying interested parties that this project will proceed as a project that does not require a quantitative PM₁₀ hot-spot analysis under 40CFR 93.123(b).

Re: I-17, Anthem Way to Jct. SR 69

1 message

Amanda Luecker <luecker.amanda@azdeq.gov>

Thu, Mar 18, 2021 at 3:16 PM

To: Beverly Chenausky <bchenausky@azdot.gov>, Sarah Fitzgerald <fitzgerald.sarah@azdeq.gov>

Hi Beverly! We do not have any comments at this time. Steve seems very knowledgeable about NEPA, I appreciate the information he provided. It helped me understand the process a bit more.

Thank you!
Amanda Luecker

On Thu, Mar 18, 2021 at 10:56 AM Beverly Chenausky <bchenausky@azdot.gov> wrote:

Did you have any comments on the conformity side of things? Did Steve resolve your inquiries?

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



On Mon, Mar 15, 2021 at 3:20 PM Amanda Luecker <luecker.amanda@azdeq.gov> wrote:

Thank you Steve! Things have changed since I practiced NEPA. Then again my career took an unusual but somehow appropriate path. I appreciate the information.

Amanda

On Mon, Mar 15, 2021 at 3:03 PM Steven Olmsted <solmsted@azdot.gov> wrote:

Amanda

I should answer your EA question as well. Yes, there was an EA as you noted. 20 years ago a study (eng and env) was started. There was an initial start to a study EA that addressed alternatives for completely new I-17 alignment. This study was never completed

As we now for those that drive North - that effort never happened as realignment through the rim put the cost at \$1b.

This is a separate effort for adding a lane to the existing alignment so no additional EA level analysis is required.

Let me know if you need anything

Steve

On Mon, Mar 15, 2021 at 1:31 PM Amanda Luecker <luecker.amanda@azdeq.gov> wrote:

Oh okay - I read somewhere in the DCR that an EA and Air Report were prepared for this. That is the problem with stepping into projects during these late stages.

Hi Steve - Really the heart of my question is, is there any requirement that all the I-17 improvement projects be considered together for a cumulative impact on air quality? Thank you.

On Mon, Mar 15, 2021 at 1:22 PM Beverly Chenausky <bchenausky@azdot.gov> wrote:

Amanda - This is a CE project so no environmental document is planned to be prepared for this project. In terms of air quality work we are assessing the need for transportation conformity hot-spot for this project but we will not be performing any NEPA related air quality tasks as this is a CE. For example, the MSAT's guidance discusses no analysis for a CE listed on FHWA's website here.

https://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/msat/

I am including Steve Olmsted the NEPA planner for this project in this email, he may have additional information on this project and information on the analysis requirements for CE's.

Beverly T. Chenausky

Beverly H. Chenausky
Air & Noise Program Manager
MD EM02, Room 41

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On Mon, Mar 15, 2021 at 12:48 PM Amanda Luecker <luecker.amanda@azdeq.gov> wrote:

Hi Beverly,

I am looking at the air analysis materials today. Where can I find the EA and Air Study for this project? I'm interested in both. I see that lots of work is coming up along the I-17 corridor. I know that the processes and decisions involved in analyzing projects of this size are detailed and comprehensive. Anything additional that can help me understand how upcoming I-17 improvements are being analyzed cumulatively, or why they are not, would be helpful.

I hope things are going well for you,

--

Amanda Luecker, AICP

Associate Transportation Planner, Transportation Solutions



Office: 602-771-4887

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Amanda Luecker, AICP

Associate Transportation Planner, Transportation Solutions



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Steven Olmsted

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RE: Interagency Consultation: NHPP-017-A(228)S | 17 MA 229 H6800 01C I-17, Anthem Way to Jct. SR 69 (Cordes Junction)

1 message

Wamsley, Jerry <Wamsley.Jerry@epa.gov>

Wed, Mar 17, 2021 at 3:17 PM

To: Beverly Chenausky <bchenausky@azdot.gov>

Cc: "Lee, Anita" <Lee.Anita@epa.gov>, "OConnor, Karina" <OConnor.Karina@epa.gov>, "Meek, Clifton" <meek.clifton@epa.gov>

Hello Beverly,

Thank you for the opportunity to review and comment on the Project of Air Quality Concern Questionnaires (PM and CO) for the added lane and flex lanes on I-17 in Maricopa County. We have no comments or suggestions for your review.

Sincerely,

Jerry Wamsley

From: Beverly Chenausky <bchenausky@azdot.gov>

Sent: Wednesday, March 3, 2021 1:30 PM

To: Lindy Bauer <lbauer@azmag.gov>; Transportationconformity <transportationconformity@azdeq.gov>; Wamsley, Jerry <Wamsley.Jerry@epa.gov>; Johanna Kuspert (AQD) <Johanna.Kuspert@maricopa.gov>; Jennifer (FHWA) <jennifer.elsken@dot.gov>

Cc: Dean Giles <dgiles@azmag.gov>; Paul O'brien <POBrien@azdot.gov>; Annette Riley <ariley@azdot.gov>; Steven Olmsted <solmsted@azdot.gov>; Meek, Clifton <meek.clifton@epa.gov>; OConnor, Karina <OConnor.Karina@epa.gov>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Rebecca Yedlin <rebecca.yedlin@dot.gov>

Subject: Interagency Consultation: NHPP-017-A(228)S | 17 MA 229 H6800 01C I-17, Anthem Way to Jct. SR 69 (Cordes Junction)

ADOT, is presenting the following local project, **I-17, Anthem Way to Jct. SR 69 (Cordes Junction)**, for interagency consultation for PM10, per 40 CFR 93.105 as a potential project that is **not** a project of Air Quality Concern and thereby **will not** require a PM10 hot-spot analysis. If through interagency consultation it is determined that this project will not require a hot-spot analysis, other conformity provisions apply and will be addressed in the air quality section of the environmental clearance. ADOT is requesting responses to the attached PM questionnaire within **10 business days**; a non-response will be interpreted as concurrence that the project is not a project of air quality concern and does not require a hot-spot analysis. If any consulted party believes this project should be treated as a project of air quality concern that requires a Quantitative PM hot-spot analysis, please document the appropriate section under 40 CFR 93.123 (b) that applies to the project and describe why the project should be treated as a project of air quality concern. (Refer to the attached document "H6800 MP POAQC Questionnaire_3321.pdf" with additional supporting traffic data in "I-17 Anthem to SR 69 Traffic Memo_3321.pdf").

Also, for informational purposes, ADOT, is including the CO assessment for this project. This project only has one signalized interchange in the CO maintenance area and does not require CO modeling for transportation conformity purposes under 40 CFR 93.123(a). This project without any congested intersections would not cause or contribute to any new localized CO violations, increase the frequency or severity of any existing CO violations, or delay timely attainment of any NAAQS or any required interim emission reductions or other milestones in the CO maintenance area. (Refer to the attached document "H6800 CO Questionnaire_3321.pdf").

Please be advised that only two miles of the study area (MP 229 to MP 231) is located in the Maricopa County (Phoenix) Nonattainment Area for particulates 10-microns in diameter or less (PM10) and carbon monoxide (CO) Maintenance Area subject to project-level conformity. Additional information on the flex-lane portion of the project can be found on the project website at: <https://azdot.gov/projects/central-district-projects/i-17-widening-and-improvement-project-anthem-way-sunset-point>.

If you have any questions or need additional time to review the materials please let me know.

Beverly T. Chenausky
Air & Noise Program Manager

Re: Interagency Consultation: NHPP-017-A(228)S | 17 MA 229 H6800 01C I-17, Anthem Way to Jct. SR 69 (Cordes Junction)

1 message

Beverly Chenausky <bchenausky@azdot.gov>
To: "Yedlin, Rebecca (FHWA)" <Rebecca.Yedlin@dot.gov>
Bcc: ADOTAirNoise - ADOT <adotairnoise@azdot.gov>

Thu, Mar 11, 2021 at 10:53 AM

Oops thanks, will correct it.

Beverly T. Chenausky
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On Thu, Mar 11, 2021 at 5:55 AM Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov> wrote:

FHWA's only comment is on the first page of the questionnaires, the 326 MOU is referenced. It should be the 327 MOU. Thanks, Rebecca

From: Beverly Chenausky <bchenausky@azdot.gov>
Sent: Wednesday, March 3, 2021 2:30 PM
To: LBauer azmag.gov <LBauer@azmag.gov>; Transportationconformity <transportationconformity@azdeq.gov>; Wamsley.Jerry <wamsley.jerry@epa.gov>; Johanna Kuspert (AQD) <Johanna.Kuspert@maricopa.gov>; Elsken, Jennifer (FHWA) <jennifer.elsken@dot.gov>
Cc: Dean Giles <dgiles@azmag.gov>; Paul O'brien <POBrien@azdot.gov>; Annette Riley <ariley@azdot.gov>; Steven Olmsted <solmsted@azdot.gov>; Clifton Meek <meek.clifton@epa.gov>; Karina O'Conner <oconnor.karina@epa.gov>; ADOTAirNoise - ADOT <adotairnoise@azdot.gov>; Yedlin, Rebecca (FHWA) <Rebecca.Yedlin@dot.gov>
Subject: Interagency Consultation: NHPP-017-A(228)S | 17 MA 229 H6800 01C I-17, Anthem Way to Jct. SR 69 (Cordes Junction)

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conformity. Additional information on the flex-lane portion of the project can be found on the project website at: <https://azdot.gov/projects/central-district-projects/i-17-widening-and-improvement-project-anthem-way-sunset-point>.

If you have any questions or need additional time to review the materials please let me know.

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