



Arizona Department of Transportation Environmental Planning

BIOLOGICAL EVALUATION

Interstate 10, Junction Interstate 19 to Kolb Road
and State Route 210, Golf Links Road to Interstate 10
010-E(210)S
010 PM 260 H7825 01L

Prepared for:
Arizona Department of Transportation
Environmental Planning
1611 W. Jackson St., EM02
Phoenix, AZ 85007

ADOT Approval Signature

Prepared by:
EcoPlan Associates, Inc.
701 W. Southern Ave., Suite 203
Mesa, AZ 85210
EcoPlan Number: 09-301004

January 18, 2019
Submittal Number: 1

*This report is the property of ADOT and may contain sensitive biological information.
ADOT approval is required prior to reproduction or distribution.*

EXECUTIVE SUMMARY—BIOLOGICAL EVALUATION

Project Type: Interstate and traffic interchange improvements

Project Duration and Anticipated Construction Schedule: Construction of the first phase (yet to be determined) is anticipated to occur in 2020, with the remaining construction phases occurring over 10 to 20 years.

Project Location: The project is located in Tucson, Pima County, Arizona. This project is on Interstate 10 (I-10) from the junction of Interstate 19 (I-19) to Kolb Road and State Route (SR) 210 from Golf Links Road to I-10. The I-10 construction footprint extends from the I-19 junction at milepost (MP) 260.2 to MP 271.8 east of Kolb Road and the SR 210 footprint extends from Golf Links Road to a future planned connection with I-10 at Alvernon Way.

ESA Species and Critical Habitat Analyzed in Detail and Determinations Made

Common Name	Scientific Name	Status/Critical Habitat	Determination
Pima pineapple cactus	<i>Coryphantha scheeri</i> var. <i>robustispina</i>	Endangered	No effect

TABLE OF CONTENTS

1.	Project Overview.....	1
1.1	<i>Federal Nexus</i>	1
1.2	<i>Project Description</i>	1
1.3	<i>Project Location</i>	2
2.	Federally Proposed and Listed Species and Designated Critical Habitat	5
3.	Environmental Baseline	6
4.	Scope of Work	7
4.1	<i>Construction</i>	7
4.2	<i>Potential Impacts on Water Quality and Clean Water Act Compliance</i>	8
5.	Project Action Area	8
5.1	<i>Roadway Construction</i>	8
5.2	<i>Vegetation Removal</i>	9
5.3	<i>Culvert Reconstruction</i>	9
5.4	<i>Action Area</i>	9
6.	Species Evaluation.....	11
6.1	<i>Pima Pineapple Cactus</i>	11
7.	Environmental Commitments.....	13
8.	Literature Cited	14
9.	Signatures.....	15

LIST OF TABLES

Table 1.	Project Species List	5
Table 2.	Species Summary Table.....	11
Table B-1.	Other Federal Sensitive Species	B-3

LIST OF FIGURES

Figure 1.	State Location Map	3
Figure 2.	Project Location Map	4
Figure 3.	Action Area	10

LIST OF APPENDICES

Appendix A.	Photos
Appendix B.	Other Special Status Species
Appendix C.	Agency Coordination

DEFINITIONS

Action area	all areas to be affected directly or indirectly by the federal action and not merely the immediate area involved in the action (50 CFR §402.02)
ADOT	Arizona Department of Transportation
AGFD	Arizona Game and Fish Department
BE	Biological Evaluation
C-D	collector-distributor
Construction footprint	the area where construction-related equipment would operate
DCR	Design Concept Report
EA	Environmental Assessment
EcoPlan	EcoPlan Associates, Inc.
ESA	Endangered Species Act
FHWA	Federal Highway Administration
I-10	Interstate 10
I-19	Interstate 19
IPaC	Information for Planning and Consultation
MP	milepost
Online Review Tool	AGFD Arizona Environmental Online Review Tool
PPC	Pima pineapple cactus
ROW	right-of-way
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
TI	traffic interchange
US	United States
USGS	US Geological Survey
USFWS	US Fish and Wildlife Service

1. Project Overview

1.1 Federal Nexus

The project evaluated in this Biological Evaluation (BE) is funded in part by the Federal Highway Administration (FHWA) and would be constructed by the Arizona Department of Transportation (ADOT).

This BE addresses the proposed action in compliance with Section 7(c) of the Endangered Species Act (ESA) of 1973, as amended. Section 7 of the ESA requires that, through consultation (or conferencing for proposed species) with the US Fish and Wildlife Service (USFWS), federal actions do not jeopardize the continued existence of any threatened, endangered, or proposed species or result in the destruction or adverse modification of critical habitat. This document evaluates the potential effects of the proposed transportation project on species that are federally listed under the ESA. Specific project design elements are identified that avoid or minimize adverse effects of the project on listed species and/or critical habitat.

1.2 Project Description

ADOT is initiating a Design Concept Report (DCR) and an Environmental Assessment (EA) for proposed improvements to Interstate 10 (I-10) from Junction Interstate 19 (I-19) to Kolb Road and to State Route (SR) 210 from Golf Links Road to I-10. Project construction would be phased over 10 to 20 years as funding becomes available. The DCR and the EA are scheduled to be completed in March 2019. The results of the DCR and the EA would allow ADOT to determine logical project segments and construction phasing over multiple years.

The DCR/EA phase is a continuation of the 2015 Feasibility Study, which looked at improvement alternatives on I-10 from I-19 to SR 83. Based on the results of that study, two alternatives and the no build option are being evaluated for I-10 from I-19 to Kolb Road and for SR 210 from Golf Links Road to a connection with I-10 at Alvernon Way.

Within the construction footprint (the area where construction-related equipment would operate), I-10 consists of a six-lane divided highway (three through lanes in each direction) from I-19 to Kino Parkway and a four-lane divided highway (two through lanes in each direction) from Kino Parkway to Kolb Road. The I-10 right-of-way (ROW) ranges from 200 to 300 feet within the construction footprint. SR 210 (also known as Aviation Parkway) extends from downtown Tucson as a four-lane divided highway (two through lanes in each direction), terminating at Golf Links Road. The need for improvements identified in the Feasibility Study include:

- A lack of north–south arterial options to deliver traffic to the downtown business district
- Poor operation performance and high crash rates at the I-10 traffic interchanges (TIs) due to spacing and outdated design types
- The current capacity of I-10 would not meet projected traffic growth
- A high percentage of travel on I-10 is for local trips rather than through traffic

The purpose of the proposed improvements is to address deficiencies in the interstate highway system and to provide motorists with an alternative route into the City of Tucson’s downtown business district. The two build alternatives differ in their concepts for widening I-10. “Alternative 1, System I” adds through lanes to I-10, while “Alternative 2, System IV” creates a collector-distributor (C-D) roadway from Alvernon Way to Kolb Road. A C-D roadway is a supplemental facility between freeway main lanes and the frontage roads. Their primary purpose is to move weaving and lane-changing traffic from the high-speed traffic on the freeway. The C-D roadways accommodate local traffic, allowing freeway main lanes to function as an expressway for higher-speed through

traffic. The extension of SR 210 along the Alvernon Way alignment is identical under the System I and System IV alternatives, creating a limited-access roadway with a system interchange connection to I-10.

1.3 Project Location

The project is located in Tucson, Pima County, Arizona (Figure 1). The construction footprint along I-10 extends from the I-19 Junction at approximately milepost (MP) 260.2 eastbound to east of Kolb Road (MP 271.8), and the SR 210 footprint extends from Golf Links Road to a future planned connection with I-10 at Alvernon Way (Figure 2). The construction footprint falls within the jurisdictions of the City of Tucson, the City of South Tucson, unincorporated Pima County, and the Davis-Monthan Air Force Base (US Department of Defense). The project would occur within ADOT ROW and would require easements and acquisitions from private properties. Depending on the alternative selected, 172 to 186 parcels may be affected, with 140 to 155 acres to be acquired.

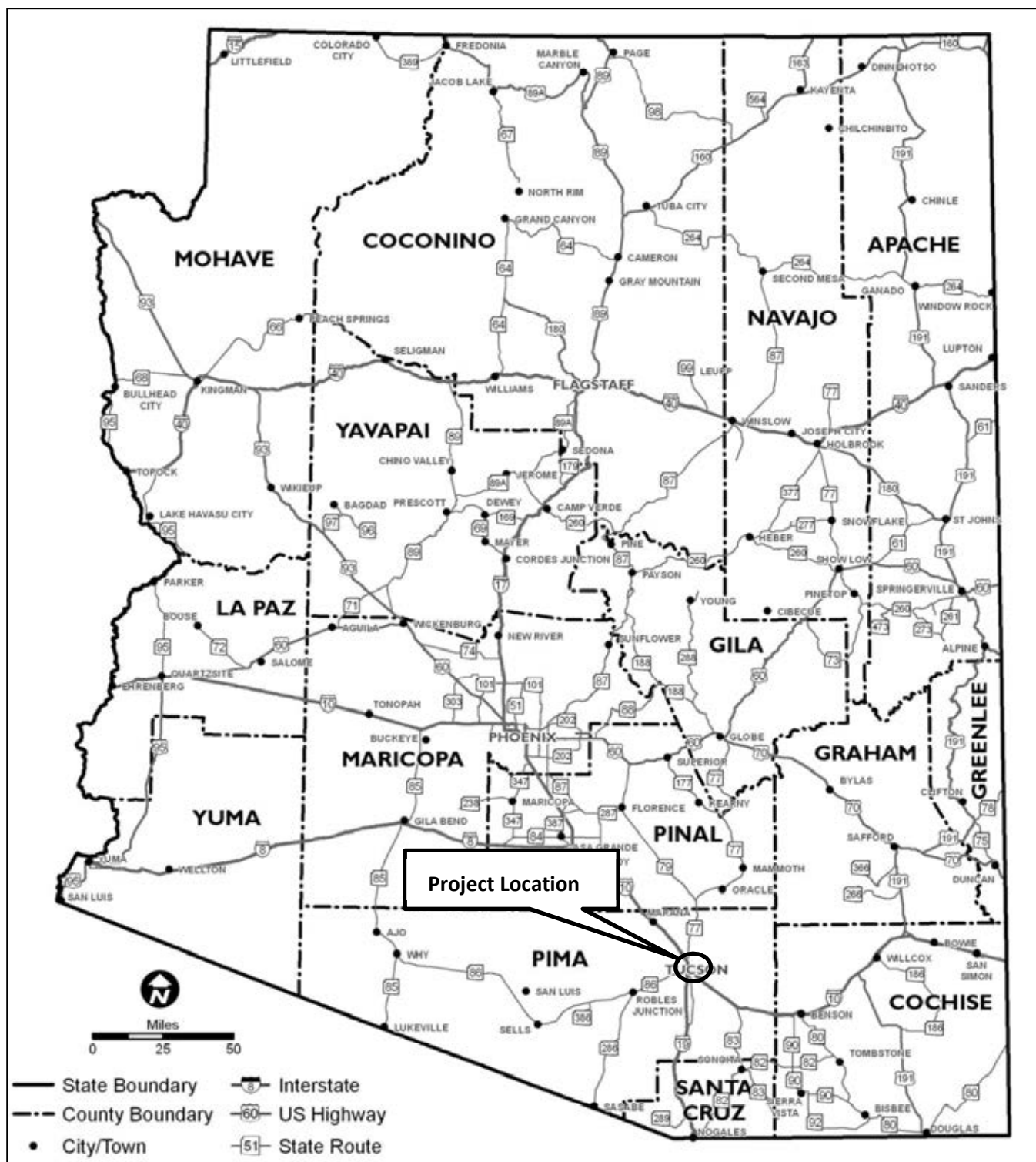
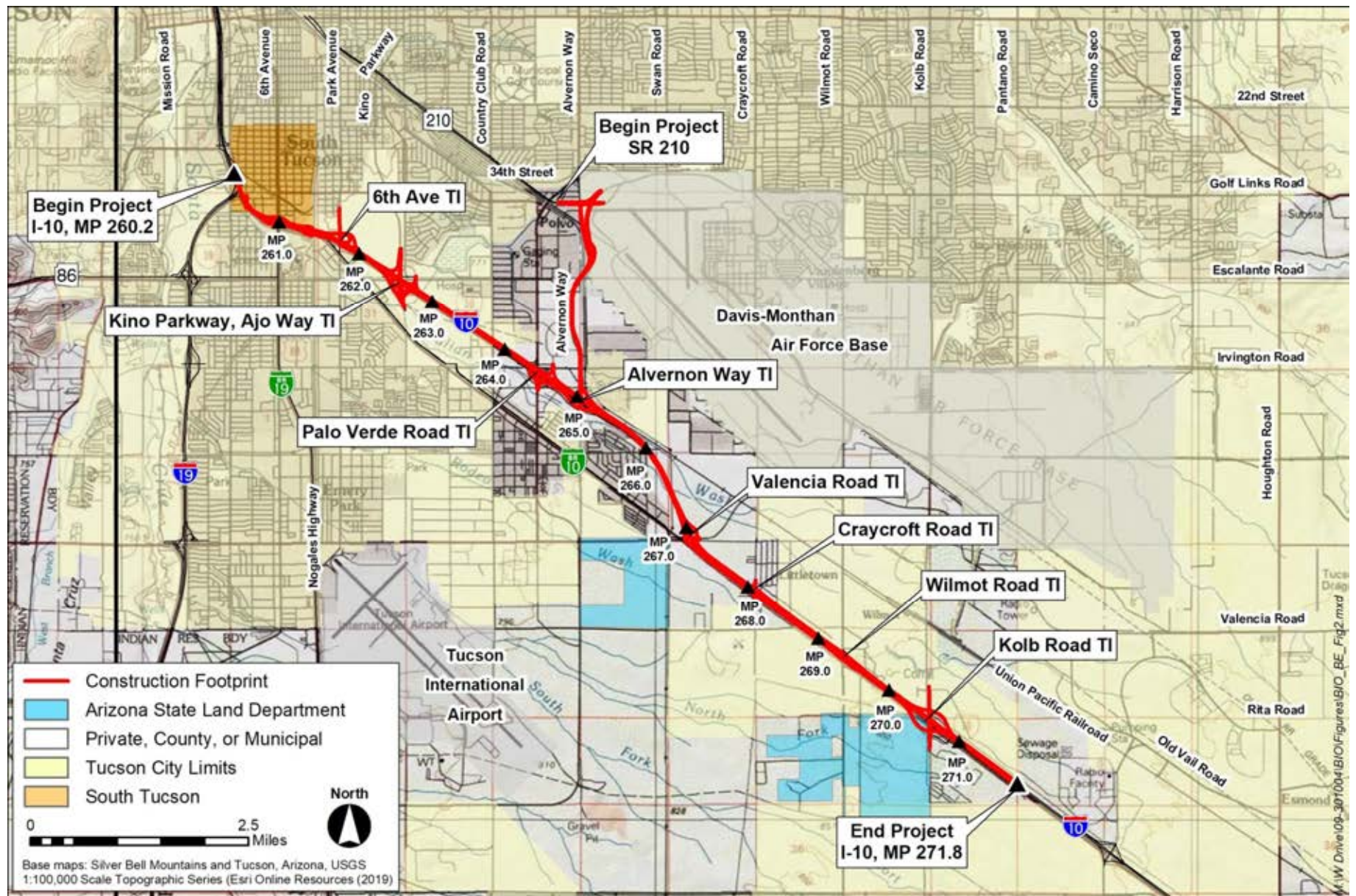


Figure 1. State Location Map



2. Federally Proposed and Listed Species and Designated Critical Habitat

The USFWS Information for Planning and Consultation (IPaC) system was accessed on November 8, 2018 (Consultation Code: 02EAAZ00-2017-SLI-0250) and the Arizona Game and Fish Department (AGFD) Arizona Environmental Online Review Tool (Online Review Tool) was accessed on November 8, 2018 (HGIS-04837); results of both are included in Appendix C. The ESA species list from the IPaC receipt was reviewed by a qualified biologist (Maria M. Altemus, EcoPlan Associates, Inc. [EcoPlan]) and the species are listed in Table 1. The IPaC and the AGFD Online Review Tool were reviewed for the presence of critical habitat within the action area (defined in Section 5); however, neither identified critical habitat within the search area for the project.

Only the highlighted species in Table 1 is evaluated in detail in the Species Evaluation section of this document. Justifications for excluding the remaining species from further evaluation are included in Table 1. The project and related erosion and sediment control measures would have no effect on species excluded from further evaluation.

Table 1. Project Species List

Species	Status ^a	Habitat Requirements	Exclusion Justification
Mammals			
Jaguar (<i>Panthera onca</i>)	ESA LE	In Arizona, found in a variety of habitats, from Sonoran desertscrub up through subalpine conifer forests from 1,600 to 9,000 feet elevation.	No suitable habitat. No mountains or hills for connectivity.
Birds			
California least tern (<i>Sterna antillarum browni</i>)	ESA LE	Open, bare, or sparsely vegetated sand, sandbars, gravel pits, or exposed flats along shorelines of inland rivers, lakes, reservoirs, or drainage systems below 2,000 feet elevation.	No suitable habitat. No riparian vegetation.
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	ESA LT	Uses large, contiguous patches of multi-layered riparian habitat, such as cottonwood-willow gallery forests along rivers and streams below 6,600 feet elevation.	No suitable habitat. No riparian vegetation.
Reptiles			
Northern Mexican gartersnake (<i>Thamnophis eques megalops</i>)	ESA LT	Cienegas, stock tanks and rivers that are densely vegetated, such as lowland river riparian woodlands, and upland stream gallery forests most frequently from 3,000 to 5,000 feet elevation.	No suitable habitat. No suitable water sources, riparian woodlands, or forests.
Sonoyta mud turtle (<i>Kinosternon sonoriense longifemorale</i>)	ESA LE	Restricted to pond and stream habitat at Quitobaquito Springs in Organ Pipe Cactus National Monument, Arizona, and in nearby Rio Sonoyta, Sonora, Mexico, at 1,100 feet elevation.	No suitable habitat. No ponds or streams.
Flowering Plants			
Pima pineapple cactus (<i>Coryphantha scheeri</i> var. <i>robustispina</i>)	ESA LE	Deep, well-drained alluvial silty to gravelly soils of granitic origin with low clay content. On or near hills and ridge tops and slopes of less than 5 percent grade, avoiding arroyo bottoms and slopes of greater than 10 percent grade, from 2,300 to 4,500 feet elevation.	Evaluated in detail. See Species Evaluation section.
^a ESA = Endangered Species Act, LE = Listed Endangered, LT = Listed Threatened Source: USFWS 2018			

3. Environmental Baseline

The environmental baseline represents the current biological and physical conditions of the action area. This baseline describes the current conditions and reflects the following:

- Past and present impacts of all federal, state, or private activities,
- Anticipated impacts of all proposed federal projects that have already undergone Section 7 consultation, and
- Impacts of state or private actions that are contemporaneous with the consultation in process.

The overall construction footprint lies between approximately 2,400 feet and 2,840 feet elevation¹ on nearly flat terrain within the Tucson Basin. The construction footprint descends gradually from southeast to northwest. The Tucson Mountains, a low desert range, extend to within 1.5 miles northwest of the project. The nearest other areas of elevated terrain include Tanque Verde Ridge, a western ridge of the Rincon Mountains, approximately 7.5 miles northeast of the project, and the Santa Rita Mountains, 15 miles southeast of the project.

Julian Wash, a first-order tributary of the Santa Cruz River that lies 0.5 mile west of the construction footprint, parallels I-10 throughout the construction footprint and then crosses the roadway 0.5 mile east of Alvernon Way. Julian Wash is ephemeral; no semi-perennial or perennial watercourses are within the construction footprint or the action area.

Numerous patches of xeroriparian habitat, as designated by Pima County ordinance 2005-FC2, are along I-10 and intersect the periphery of the construction footprint. The xeroriparian habitat classes are associated with ephemeral streams, and vegetation species are similar to those found in upland areas; however, vegetation tends to be more dense in these areas (Pima County Regional Flood Control District 2011). No hyroriparian or mesoriparian habitat exists within the construction footprint or the action area.

Soils associated with the Santa Cruz River floodplain at the extreme west end of the construction footprint are of the Torrifluvents Association. These are deep, well-drained, moderately coarse to moderately fine-textured soils on nearly level to gentle slopes of floodplains and alluvial fans formed of recent mixed alluvium. From just east of 6th Avenue east throughout the remainder of the project, soils are of the Nickel-Latene-Cave Association. These are deep and shallow, well-drained, limy and gravelly, medium and moderately coarse-textured soils on nearly level terrain on dissected alluvial fans formed in calcareous old alluvium derived from igneous and sedimentary rocks (Hendricks 1985; Richard et al. 2000).

The construction footprint lies within creosote bush (*Larrea tridentata*)–dominated Arizona Upland subdivision of Sonoran desertscrub (Brown 1994). The west end of the construction footprint is predominately urban and highly developed; therefore, vegetation is limited and scattered. Landscaping within the ADOT ROW occurs from I-19 to Park Avenue and features sparse native or desert adapted plants. East of Park Avenue, native plants occurring within the ROW and on adjacent undeveloped parcels are more abundant and include native cacti, shrubs, and trees, and other Sonoran desertscrub species.

Where the native plant community is still present within the construction footprint, it varies in diversity from nearly exclusively creosote bush to other areas with higher plant diversity, such as along ephemeral drainages. Other trees, shrubs, and cacti occurring within the construction footprint include blue paloverde (*Parkinsonia florida*), velvet mesquite (*Prosopis velutina*), triangle bursage (*Ambrosia deltoidea*), four-wing saltbush (*Atriplex canescens*), spiny hackberry (*Celtis pallida*), ocotillo (*Fouquieria splendens*), burroweed (*Isocoma tenuisecta*), shrubby coldenia (*Tiquilia canescens*), whitethorn acacia (*Vachellia constricta*), soaptree yucca (*Yucca elata*),

¹ Elevations in this document are referenced to mean sea level.

desert zinnia (*Zinnia acerosa*), graythorn (*Ziziphus obtusifolia*), jumping cholla (*Cylindropuntia fulgida* var. *fulgida*), desert Christmas cactus (*Cylindropuntia leptocaulis*), cane cholla (*Cylindropuntia spinosior*), pink flower hedgehog cactus (*Echinocereus fasciculatus*), candy barrelcactus (*Ferocactus wislizeni*), and brown-spine pricklypear (*Opuntia phaeacantha*). Native grasses in the area include purple threeawn (*Aristida purpurea*), needle grama (*Bouteloua aristidoides*), fluffgrass (*Dasyochloa pulchella*), bush muhly (*Muhlenbergia porteri*), and big sacaton (*Sporobolus wrightii*).

The disturbed I-10 ROW and median and disturbed, unmaintained areas along SR 210 support a mix of many of the desert species listed above as well as native, regional, landscape, and exotic invasive species adapted to colonization or disturbed land. These include Mexican paloverde (*Parkinsonia aculeata*), honey mesquite (*Prosopis glandulosa*), sweet acacia (*Acacia farnesiana*), African sumac (*Rhus lancea*), carelessweed (*Amaranthus palmeri*), desertbroom (*Baccharis sarothroides*), yellow star thistle (*Centaurea solstitialis*), prickly Russian thistle (*Salsola tragus*), desert senna (*Senna covesii*), silverleaf nightshade (*Solanum elaeagnifolium*), and puncture vine (*Tribulus terrestris*).

Invasive grasses include Bermudagrass (*Cynodon dactylon*), Johnsongrass (*Sorghum halepense*), buffelgrass (*Pennisetum ciliare*), and other species. Buffelgrass is particularly abundant within the median and along the shoulders of I-10, and it has invaded the Sonoran desertscrub community adjacent to much of the east end of the construction footprint.

The construction footprint is defined by the I-10 and SR 210 alignments; the surrounding action area includes numerous roadways. The construction footprint is mostly urban and suburban, with residences, commercial buildings, and industrial facilities. Wildlife connectivity in the area is very poor due to the level of urbanization and the number of roadways. A number of undeveloped parcels of land are along I-10, particularly at the south end of the construction footprint.

4. Scope of Work

4.1 Construction

At this DCR/EA stage in the project, current construction details for different phases, including construction techniques, construction staging, site preparation, construction equipment to be used, and access are not yet known. As the project progresses and prior to each phase, biological reevaluations would include more specific construction details. However, in general, the major project improvements would include:

- Widening I-10 (additional through lanes and/or C-D roadway concept)
- Extending SR 210 to I-10 along the Alvernon Way alignment
- Eliminating the Palo Verde Road TI
- Adding a new TI at Country Club Road
- Replacing or widening existing bridges along I-10
- Improving existing TIs and crossroads

4.1.1 Alternative 1, System I

Under the System I alternative, SR 210 would be extended south, generally along Alvernon Way, to intersect I-10 at the existing Alvernon Way TI. The TI would be reconfigured to accommodate this connection. With this alternative, the new SR 210 would cross Ajo Way on a new grade-separated TI. The length of this new roadway would be about 2.5 miles. The new roadway would replace the existing Alvernon Way. New connections at

Alvernon Way, Golf Links Road, and Palo Verde Road would occur. A new grade-separated diamond interchange with Ajo Way would be added, and SR 210 would be elevated over the Union Pacific Railroad and Irvington Road. Local access would change because no direct access would occur off the SR 210 extension.

New ROW would be required from a triangular area of commercial/industrial property bounded by the Union Pacific Railroad, Golf Links Road, and 34th Street, from commercial property in the southwest quadrant of Irvington Road and Alvernon Way, and along Alvernon Way to accommodate a freeway cross-section.

4.1.2 Alternative 2, System IV

The System IV alternative is an improvement of I-10 from the I-10/I-19 TI easterly through the Kolb Road TI and the extension of SR 210 south along the Alvernon Way alignment to I-10. This alternative features C-D roadways adjacent to the eastbound and the westbound I-10 mainline roadway from Alvernon Way easterly through the Kolb Road TI. The adjacent C-D roadways provide an expanded frontage road system to handle local destination traffic and the mainline freeway, with limited access points for through traffic.

An I-10/SR 210 system interchange would provide access between SR 210 and the eastbound and westbound I-10 C-D roadways and would be integrated with the diamond interchange at the junction of Alvernon Way and I-10. The connection at SR 210 shares the same configuration as Alternative I from Golf Links Road to I-10. This alternative allows direct, free-flow connections from I-10 to SR 210 at the Alvernon Way TI. Access points to C-D roadways would occur at Valencia Road, Craycroft Road, Wilmot Road, and Kolb Road. Additional ROW would be required for SR 210, the SR 210/Golf Links TI, the Ajo Way TI, and the I-10/SR 210 system interchange. Because of the additional width of the C-D roadways along I-10, some additional ROW may be required along I-10.

4.2 Potential Impacts on Water Quality and Clean Water Act Compliance

There is potential for impacts to Waters of the United States; however, it is unknown at this time what level of Clean Water Act Section 404/401 permitting would be needed. One named wash, Julian Wash, crosses the construction footprint southeast of the Alvernon Way TI. Numerous other unnamed washes throughout the construction footprint drain into Julian Wash. The 100-year floodplain of Julian Wash abuts the construction footprint. More than one acre of soil would be disturbed; therefore, an Arizona Pollutant Discharge Elimination System permit would be required, and a Storm Water Pollution Prevention Plan (SWPPP) would be developed and implemented. The project is not within 0.25 mile of an impaired or unique water.

5. Project Action Area

The action area includes all areas to be affected directly or indirectly by the action and not merely the construction footprint (50 CFR §402.02).

5.1 Roadway Construction

Roadway construction would take place throughout the ROW within the construction footprint. Roadway construction would include removing concrete headwalls and end sections, installing bridge concrete barriers, repairing the bridge deck, milling the existing asphalt concrete, paving base course asphalt concrete, paving turnouts/pullouts, applying temporary striping, replacing guardrails, paving the surface course asphalt concrete, installing new signs, and painting thermoplastic striping. Impacts from roadway construction would include direct impacts to vegetation and wildlife from ground disturbance due to roadway widening and noise impacts from construction equipment. To account for roadway construction impacts, which include noise impacts, a 0.25-mile buffer around the construction footprint is included in the action area.

5.2 Vegetation Removal

Vegetation removal would be required for roadway widening. Vegetation removal would include grasses, shrubs, and small trees along the shoulders within the ROW and in the median and in parcels acquired. Impacts from vegetation removal would include direct impacts to wildlife that may use shrubs or trees for shelter, nesting, or foraging. Indirect impacts may include erosion as vegetation stabilizes banks and dirt. To account for vegetation removal impacts, the entire ROW within the construction footprint and potentially acquired parcels for both alternatives are included in the action area.

5.3 Culvert Reconstruction

Culvert reconstruction or construction may occur where ephemeral washes cross the construction footprint. During culvert reconstruction, equipment may need to enter the low-flow channel to complete construction activities. Work within ephemeral washes designated as Waters of the United States by the US Army Corps of Engineers would be regulated by a Regional General Permit or a Nationwide Permit (to be determined before construction). Direct impacts from culvert reconstruction would include possible increased sedimentation downstream immediately after construction, debris falling into the wash, and potential spills of oil, fuel, or other materials into the wash. Washes within the construction footprint drain northwesterly and eventually reach Julian Wash. To account for culvert reconstruction impacts, the length of Julian Wash, starting where it crosses I-10 east of the Alvernon TI and ending at the Santa Cruz River, is included in the action area.

5.4 Action Area

Impacts from roadway construction, vegetation removal, and culvert reconstruction could have direct effects on the surrounding environment. These activities are discussed in detail in the scope of work. Environmental commitments are included in Section 7 that would be used to minimize potential impacts. The action area for the project is defined as extending throughout the construction footprint (to account for roadway construction and vegetation removal impacts), including a 0.25-mile buffer around the construction footprint (to account for noise impacts), and one mile downstream along Julian Wash (to account for culvert reconstruction impacts) (Figure 3).

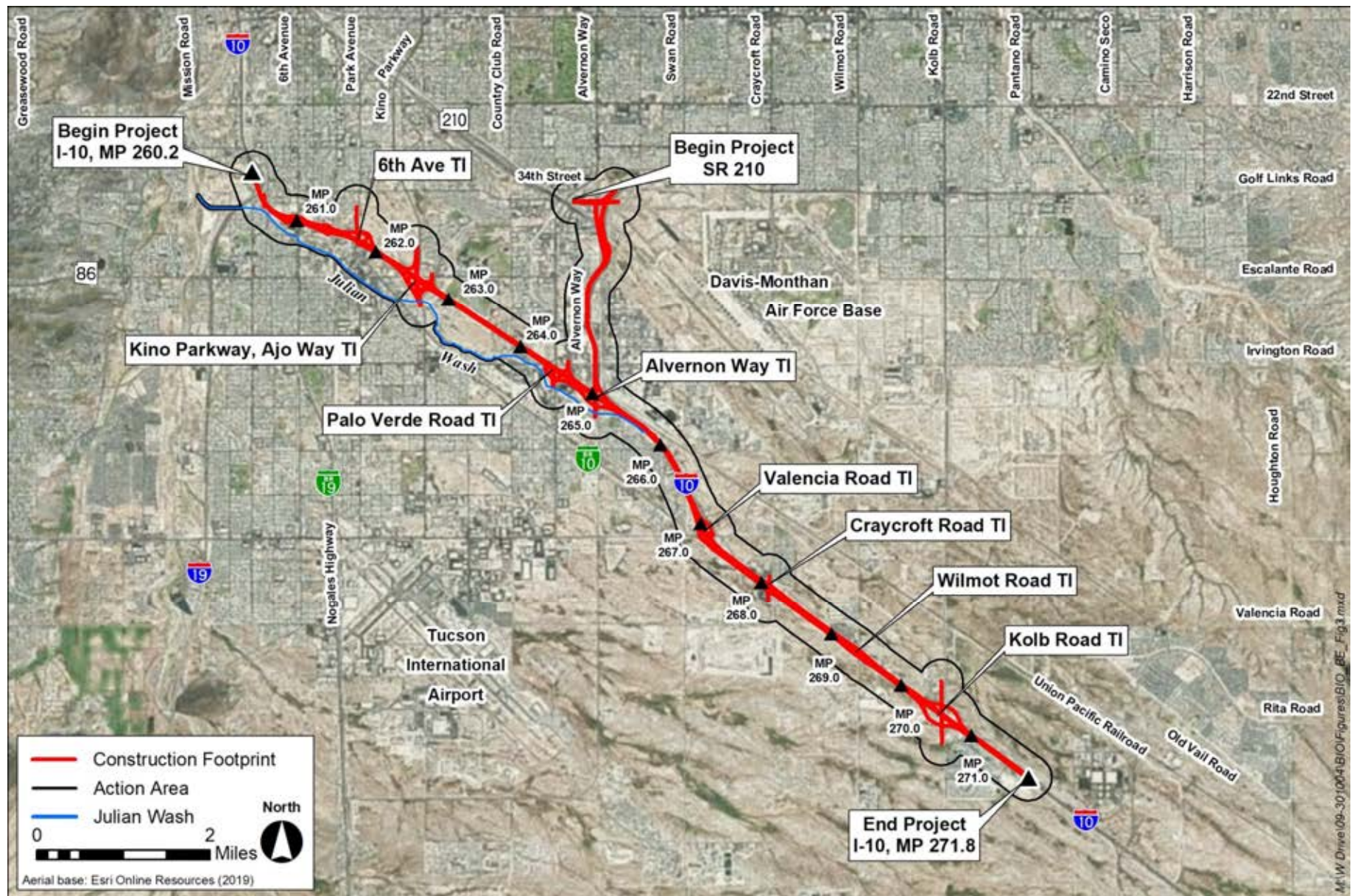


Figure 3. Action Area

6. Species Evaluation

6.1 Pima Pineapple Cactus

Status

Endangered (58 FR 49875; September 23, 1993) without critical habitat.

Species Summary Table

Table 2. Species Summary Table

Attribute	Pima Pineapple Cactus
Habitat	Alluvial basins and hillsides in semidesert grasslands, desertscrub, and the transition area between the two; often found on flat ridgetops and areas with <10–15% slopes
Soil type	Highly variable; shallow to deep and silty to rocky
Cover	Open
Lighting	Full
Water	Drought-tolerant
Tolerance of disturbed conditions	Often found in disturbed conditions; can be destroyed by physical disturbance
Sensitivity to herbicides	Very sensitive to soil-active herbicide
Pollinators	Native bees and honeybees; not self-pollinating
Dispersal	Reseeds close to mother plant; dispersed by animals eating fruits
Seasonal activity	Flowers early July until August

Life History

Species Description and Ecology: The Pima pineapple cactus (PPC) is a hemispherical cactus up to 18 inches tall and 7 inches in diameter. The spines appear in clusters that are situated on tubercles, with one strong central spine that is usually hooked, and 6–15 straight radial spines. The spines are stout and are often straw-colored, but they can become black with age. The plants can be single-stemmed or multi-headed. They can also appear in clusters that are formed when seeds germinate at the base of a mother plant or when a tubercle of the mother plant roots. PPCs are similar in appearance to the juvenile barrel cactus (*Ferocactus*); however, the spines and areoles of PPCs are located on the tubercles rather than on the ribs (AGFD 2001).

Reproduction: The cactus typically flowers in early July until August and is onset with summer rains. Flowers are yellow, salmon, or occasionally white, with a relatively narrow floral tube. The PPC is not a self-pollinating plant. Its primary pollinator is a ground nesting, solitary native bee; honeybees also act as a likely pollinator. Fruits are green, ellipsoid, and succulent (AGFD 2001; USFWS 1993, 2007). Propagation occurs through seed dispersal and germination or from the rooting of tubercles on the mother plant. Seeds typically establish near the base of the mother plant, and seeds are dispersed by rabbits and rodents (Environmental Conservation Online System 2017).

Suitable Habitat: PPCs can be found in semidesert grassland and Sonoran desertscrub from 2,300 to 5,000 feet elevation (AGFD 2001). Most commonly, PPCs occur in open areas on flat ridgetops or in other areas with less than 10–15 percent slope. Soils range from shallow to deep and silty to rocky, with a preference for silty to gravelly deep alluvial soils (USFWS 1993). Associated plant species include whitethorn acacia (*Acacia constricta*), velvet mesquite (*Prosopis velutina*), triangle-leaf bursage (*Ambrosia deltoidea*), snakeweed (*Gutierrezia microcephala*), and various other cacti and grasses (AGFD 2001).

Threats

Residential and commercial development, road construction and maintenance, and utility corridor construction associated with a rapidly growing human population in southern Arizona continues to be the most significant threat to PPCs, causing habitat loss and fragmentation throughout the species range. Invasive grass species, such as Lehmann lovegrass (*Eragrostis lehmanniana*) and buffelgrass, are also a threat to the existence of PPCs by converting previously suitable, open habitats into dense stands of grasses (USFWS 2007). Treatment of these invasive grasses also poses a problem for PPCs if present within this converted habitat. Herbicides that are directly applied to PPCs could result in injury or mortality.

Range and Survey History

In Arizona, PPCs may be found between the Baboquivari Mountains and the western foothills of the Santa Rita Mountains from southern Tucson south to the US–Mexico border. PPCs are usually sparsely distributed within their habitat. Population density estimates vary from 0.22 to 0.54 plants per acre within suitable habitat (USFWS 1993).

Sabra Tonn, AGFD Heritage Data Management System program supervisor, indicated that only one PPC record is known from within 3 miles of the project: an individual was reported in 1985 approximately 2 miles south of the project near Old Nogales Highway and South Fletcher Road. No additional record of occurrence is from within 3 miles of the project; no records of PPCs exist from the action area.

EcoPlan biologists conducted PPC surveys in 2013 along Western Area Power Administration's Tucson–Apache 115-kV transmission line (EcoPlan 2013), which roughly parallels I-10 south of Tucson. Several individuals were observed along the transmission line near Wilmot Road, approximately 4.2 miles south of I-10. EcoPlan (2016) also conducted PPC surveys in 2014 for improvements along Wilmot Road 3.5 to 10.5 miles south of I-10. The most northern plant observed during this effort was recorded 3.8 miles south of I-10 along Wilmot Road and 3.25 miles southwest of I-10 at Kolb Road.

EcoPlan conducted a 100 percent pedestrian survey for the PPC in suitable habitat within the construction footprint of the Kolb Road and Wilmot Road TIs on April 19, 2017. No other suitable PPC habitat exists within the construction footprint. No PPCs were encountered during the survey.

Habitat Suitability Evaluation

The construction footprint lies just north and outside the known geographic distribution of the PPC. The action area lies at least 2 miles north of the nearest known record for the species. Between 3 and 4 miles to the south, occurrence records increase and the species is far more common. Currently, the majority of the construction footprint is heavily disturbed, and terrain adjacent to the I-10 and SR 210 ROW is developed and does not provide suitable habitat for the PPC. To the southeast, development adjacent to I-10 is less continuous, and patches of undeveloped Sonoran desertscrub habitat that has not been invaded by buffelgrass and may appear similar to areas south where PPCs occur. However, no plants were detected during surveys of the construction footprint, and no records exist from within 2 miles; therefore, the construction footprint and the surrounding action area are not considered suitable habitat for the species.

Analysis and Determination of Effects

The construction footprint is northeast of the currently known distribution range (personal communication, Tonn, January 7, 2019) and does not overlap the action area, and recorded occurrences of individual PPCs are no closer than 2 miles. Based on the historic and current distribution of PPCs, no suitable habitat exists within the action area.

The project would not directly affect the PPC or its habitat. Construction activities, including vegetation removal, would remain within the construction footprint. The action area may experience project-related effects due to noise and sedimentation; however, noise and sedimentation would not affect the PPC. The project would not have any effect on individuals, population numbers, distribution, or reproductive success of the species.

Interrelated and Interdependent Actions: Interrelated actions would include Best Management Practices from the SWPPP within the construction footprint. Best Management Practices would not affect PPCs because the distribution of PPCs does not extend into the construction footprint, and PPCs are not found within the construction footprint.

Determination: The project would have no effect on the Pima pineapple cactus or its habitat.

7. Environmental Commitments

ADOT Roadside Development Section Responsibilities

- Protected native plants within the project limits will be impacted by this project; therefore, the Arizona Department of Transportation Roadside Development Section will determine whether Arizona Department of Agriculture notification is needed. If notification is needed, the Arizona Department of Transportation Roadside Development Section will send the notification at least 60 (sixty) calendar days prior to the start of construction.
- The Arizona Department of Transportation Roadside Development Section will provide special provisions for the control of noxious and invasive plant species during construction that may require treatment and control within the project limits.

Southcentral District Responsibility

- If any active bird nests cannot be avoided by vegetation clearing or construction activities, the Engineer will contact the Arizona Department of Transportation Environmental Planning biologist (602.399.3233 or 602.712.7767) to evaluate the situation.

Contractor Responsibilities

- If vegetation clearing will occur during the migratory bird breeding season (March 1 to August 31), the contractor shall avoid any active bird nests. If active nests cannot be avoided, the contractor shall notify the Engineer to evaluate the situation. During the nonbreeding season (September 1 to February 28), vegetation removal is not subject to this restriction.
- Prior to construction, all personnel who will be on-site, including, but not limited to, contractors, contractors' employees, supervisors, inspectors, and subcontractors, shall review the attached Arizona Department of Transportation Environmental Planning "Western Burrowing Owl Awareness" flier.
- If any burrowing owls or active burrows are identified, the contractor shall notify the Engineer immediately. No construction activities shall take place within 100 feet of any active burrow.
- If the Engineer, in cooperation with the Arizona Department of Transportation Environmental Planning biologist (602.399.3233 or 602.712.7767), determines that burrowing owls cannot be avoided, the contractor shall employ a qualified biologist holding a permit from the US Fish and Wildlife Service to relocate burrowing owls from the project area, as appropriate.
- The contractor shall develop a Noxious and Invasive Plant Species Treatment and Control Plan in accordance with the requirements in the contract documents. Plants to be controlled shall include those listed in the state and federal noxious weed and the state invasive species lists in accordance with state and federal laws and executive orders. The plan and associated treatments shall include all areas within the project right-of-way

and easements as shown on the project plans. The treatment and control plan shall be submitted to the Engineer for the Arizona Department of Transportation Construction Professional Landscape Architect for review and approval prior to implementation by the contractor.

- Prior to the start of ground-disturbing activities and throughout the duration of construction and any landscape establishment period, the contractor shall arrange for and perform the control of noxious and invasive species in the project area.
- To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be washed prior to entering the construction site and the contractor shall inspect all construction equipment and remove all attached debris, including plant parts, soil, and mud, prior to the equipment entering the construction site.
- To prevent invasive species seeds from leaving the site, the contractor shall inspect all construction and hauling equipment and remove all debris, including plant parts, soil, and mud, prior to leaving the construction site.

8. Literature Cited

AGFD. 2001. *Coryphantha scheeri* var. *robustispina*. Unpublished abstract compiled and edited by the Heritage Data Management System. Phoenix, Arizona.

Arizona Wildlife Linkages Workgroup. 2006. Arizona's wildlife linkages assessment. Available <<https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>>. Accessed December 28, 2018.

Brown, D.E. 1994. Biotic communities: Southwestern United States and northwestern Mexico. Salt Lake City, Utah. University of Utah Press.

EcoPlan. 2013. A Pima pineapple cactus survey for the Tucson–Apache 115-kV transmission line, Pima County, Arizona. Prepared for Western Area Power Administration, Desert Southwest Region, Phoenix, Arizona.

_____. 2016. Biological evaluation: Wilmot Road improvements, north of Sahuarita Road. Prepared for Pima County Department of Transportation, Tucson, Arizona.

Environmental Conservation Online System. 2017. Species profile for Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*). Available <<https://ecos.fws.gov/ecp0/profile/speciesProfile?slid=4919>>. Accessed April 20, 2017.

Hendricks, D.M. 1985. Arizona soils. Tucson, Arizona. University of Arizona Press.

Personal communication with Tonn, Sabra. Heritage Data Management System Program Supervisor. Arizona Game and Fish Department, Phoenix, Arizona. January 7, 2019—email correspondence.

Pima County Regional Flood Control District. 2011. Regulated riparian habitat mitigation standards and implementation guidelines. Tucson, Arizona. Pima County Regional Flood Control District. November 2011.

Richard, S. M., S. J. Reynolds, J. E. Spencer, and P. A. Peachtree. 2000. Geologic map of Arizona. Tucson, Arizona. Arizona Geological Survey.

USFWS. 1993. Endangered and threatened wildlife and plants; determination of endangered status for the plant Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*); Final Rule Federal Register 58(183):49875-49880.

_____. 2007. Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*). 5-year Review. February 8, 2007.

_____. 2018. Information for Planning and Consultation. Available <<http://ecos.fws.gov/ipac/>>. Accessed November 8, 2018.

USFWS and Arizona Interagency Desert Tortoise Team. 2015. Candidate conservation agreement for the Sonoran Desert tortoise (*Gopherus morafkai*) in Arizona.

9. Signatures

Prepared by: Maria M. Altemus Date: 01/18/2019
Name: Maria M. Altemus
Title: Biologist
Firm Name: EcoPlan Associates, Inc.

Reviewed by: Thomas C. Ashbeck Date: 01/18/2019
Name: Thomas C. Ashbeck
Title: Director of Biological Resources
Firm Name: EcoPlan Associates, Inc.

APPENDIX A

PHOTOS

Site visit conducted May 12, 2017



Photo 1. View along I-10 west of the 6th Avenue exit, facing east.



Photo 2. View of I-10 west of the 6th Avenue exit from the 6th Avenue bridge over I-10, facing west.



Photo 3. View of I-10 east of the 6th Avenue exit from the 6th Avenue bridge over I-10, facing east.



Photo 4. View along I-10 east of the Ajo Highway/Kino Parkway exit, facing east.



Photo 5. View along I-10 East, east of the Ajo Highway/Kino Parkway exit, facing west.



Photo 6. View along I-10 east of Country Club Road, facing east.

APPENDIX B

OTHER SPECIAL STATUS SPECIES

I. MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act makes it unlawful to pursue, hunt, take, capture, kill, or sell birds listed therein. The statute does not discriminate between live or dead birds and grants full protection to feathers, eggs, and nests. A take does not include habitat destruction or alteration as long as there is not a direct taking of birds, nests, eggs, or parts thereof. Birds protected under the act include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, and swallows. Feathers, plumes, nests, and eggs are also protected. A complete list of protected species is found in 50 Code of Federal Regulations § 10.13.

The project would require vegetation removal throughout the construction footprint. Though there were no observations of nesting birds during the field visit, it is not yet known at what time during the year construction would take place; therefore, environmental commitments have been included to protect migratory birds.

The AGFD provided a list of occurrence records of special status species, including the American peregrine falcon (*Falco peregrinus anatum*), within 3 miles of the construction footprint. The American peregrine falcon is a cliff-dwelling bird, or in urban settings, roosts in tall office buildings. The construction footprint is devoid of cliffs or large office buildings; therefore, American peregrine falcons would not be affected by the project.

The AGFD provided a list of occurrence records of special status species, including the Western burrowing owl (*Athene cunicularia hypugaea*), within the construction footprint. The Western burrowing owl, a ground-nesting species protected by the Migratory Bird Treaty Act, is a federal species of concern and is designated as a Species of Greatest Conservation Need by the AGFD. The AGFD Heritage Data Management System database includes records indicating that large populations of burrowing owls occur on the Davis-Monthan Air Force Base, where they have been observed along the tarmac and other open sites. Other smaller populations are at 14 sites 450 feet to 2 miles from the project, where they have been observed in vacant lots and roadside parks, along desert washes, and adjacent to agricultural fields in southern Tucson between 1993 and 2013. The population nearest to I-10 within the construction footprint is along the road shoulder in the northern third of the construction footprint and north of the roadway near Kino Sports Complex. No burrowing owl or sign of burrowing owl was detected within the construction footprint during the site visit. However, due to nearby records for the species and the presence of potentially suitable habitat within the construction footprint, the following mitigation measures are included for the Western burrowing owl.

Southcentral District Responsibility

- If any active bird nests cannot be avoided by vegetation clearing or construction activities, the Engineer will contact the Arizona Department of Transportation Environmental Planning biologist (602.399.3233 or 602.712.7767) to evaluate the situation.

Contractor Responsibilities

- If vegetation clearing will occur during the migratory bird breeding season (March 1 to August 31), the contractor shall avoid any active bird nests. If active nests cannot be avoided, the contractor shall notify the Engineer to evaluate the situation. During the nonbreeding season (September 1 to February 28), vegetation removal is not subject to this restriction.
- Prior to construction, all personnel who will be on-site, including, but not limited to, contractors, contractors' employees, supervisors, inspectors, and subcontractors, shall review the attached Arizona Department of Transportation Environmental Planning "Western Burrowing Owl Awareness" flier.

- If any burrowing owls or active burrows are identified, the contractor shall notify the Engineer immediately. No construction activities shall take place within 100 feet of any active burrow.
- If the Engineer, in cooperation with the Arizona Department of Transportation Environmental Planning biologist (602.399.3233 or 602.712.7767), determines that burrowing owls cannot be avoided, the contractor shall employ a qualified biologist holding a permit from the US Fish and Wildlife Service to relocate burrowing owls from the project area, as appropriate.

II. BALD AND GOLDEN EAGLE PROTECTION ACT

The construction footprint and the surrounding ROW was evaluated by Maria M. Altemus of EcoPlan. The areas are not located within the range or suitable habitat for bald and/or golden eagles. The project would not disturb or result in take of bald or golden eagles.

III. FISH AND WILDLIFE COORDINATION ACT

This project is a federal action, but it would not impound, divert, deepen the channel, or otherwise control or modify any stream or other body of water; therefore, the Fish and Wildlife Coordination Act does not apply.

A scoping letter was sent to the USFWS on February 21, 2017; a response was not received. A scoping letter was sent to the AGFD on February 21, 2017; an email response was received March 28, 2017, and is found in Appendix C.

IV. NOXIOUS AND INVASIVE PLANT SPECIES

The ADOT District (Doug Miller, ADOT Tech III) responded to a request for information on the presence of noxious and invasive plants within the construction footprint and the surrounding ROW on April 18, 2017. The following noxious and/or invasive plants were reported within the construction footprint and the surrounding ROW: buffelgrass and star thistle (*Centaurea* spp.). A Noxious Species Control Plan would be required for the project.

During a survey of the construction footprint, EcoPlan observed invasive species, including carelessweed, yellow star thistle, prickly Russian thistle, and puncture vine. Invasive grasses included Bermudagrass, Johnsongrass, and buffelgrass. Buffelgrass is particularly abundant in the median and along the I-10 shoulders, and it has invaded the Sonoran desertscrub community adjacent to much of the east half of the construction footprint.

ADOT Roadside Development Section Responsibility

- The Arizona Department of Transportation Roadside Development Section will provide special provisions for the control of noxious and invasive plant species during construction that may require treatment and control within the project limits.

Contractor Responsibilities

- The contractor shall develop a Noxious and Invasive Plant Species Treatment and Control Plan in accordance with the requirements in the contract documents. Plants to be controlled shall include those listed in the state and federal noxious weed and the state invasive species lists in accordance with state and federal laws and executive orders. The plan and associated treatments shall include all areas within the project right-of-way and easements as shown on the project plans. The treatment and control plan shall be submitted to the Engineer for the Arizona Department of Transportation Construction Professional Landscape Architect for review and approval prior to implementation by the contractor.

- Prior to the start of ground-disturbing activities and throughout the duration of construction and any landscape establishment period, the contractor shall arrange for and perform the control of noxious and invasive species in the project area.
- To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be washed prior to entering the construction site and the contractor shall inspect all construction equipment and remove all attached debris, including plant parts, soil, and mud, prior to the equipment entering the construction site.
- To prevent invasive species seeds from leaving the site, the contractor shall inspect all construction and hauling equipment and remove all debris, including plant parts, soil, and mud, prior to leaving the construction site.

V. OTHER FEDERAL SENSITIVE SPECIES

All Species of Concern (as designated by the USFWS) that were identified on the AGFD Online Review Tool are analyzed in Table B-1, unless otherwise noted.

Table B-1. Other Federal Sensitive Species

Common Name	Scientific Name	Status	Occupied Habitat Present?	Suitable Habitat Present?	Suitable Habitat Affected?	Species Potentially Affected?
Mammals						
Cave myotis	<i>Myotis velifer</i>	USFWS SC	No	No	No	No
Birds						
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	USFWS SC				See Section I of Appendix B
American peregrine falcon	<i>Falco peregrinus anatum</i>	USFWS SC				See Section I of Appendix B
Reptiles and Amphibians						
Giant spotted whiptail	<i>Aspidoscelis stictogramma</i>	USFWS SC	No	No	No	No
Sonoran Desert tortoise	<i>Gopherus morafkai</i>	USFWS CCA	No	No	No	No
Lowland leopard frog	<i>Lithobates yavapaiensis</i>	USFWS SC	No	No	No	No

CCA = Candidate Conservation Agreement, SC = Species of Concern

Sonoran Desert tortoise: ADOT is a signatory to the *Candidate Conservation Agreement for the Sonoran Desert Tortoises (Gopherus morafkai)* in Arizona (USFWS and Arizona Interagency Desert Tortoise Team 2015) and makes accommodations for protection of tortoises on construction projects where tortoises may be present. The Sonoran Desert tortoise is common in mountain foothill and lower mountain habitat in desert ranges in the Sonoran Desert; therefore, tortoises are not likely to be found within the construction footprint or the action area.

VI. STATE SENSITIVE SPECIES

The AGFD Online Review Tool was accessed on November 8, 2018 (HGIS-04837) to determine whether special status species have been reported to occur in the area surrounding the project. As part of the environmental review process, a letter describing the project was sent to the AGFD to inform the agency of the project and to solicit comments. The letter requested any specific concerns, suggestions, or recommendations the agency may have related to the project.

The AGFD Online Review Tool included a list of special status species known to occur within 3 miles of the project, and the AGFD returned a response letter. The agency did not include any species-specific concerns related to this project. The potential for state sensitive species to be impacted by the project is unlikely because suitable habitat is not available and species are not likely to be present. Based on the lack of specific concerns from AGFD, the lack of habitat, and the fact that species are likely not present, no protection of state sensitive species is necessary.

VII. PROTECTED NATIVE PLANTS

The construction footprint and the surrounding ROW was surveyed for the presence of protected native plants on April 19, 2017, and May 12, 2017, via a pedestrian and vehicular survey. The following protected plants were found: velvet mesquite, ocotillo, soaptree yucca, jumping cholla, desert Christmas cactus, cane cholla, pink flower hedgehog cactus, candy barrelcactus, and brown-spine pricklypear.

ADOT Roadside Development Section Responsibility

- Protected native plants within the project limits will be impacted by this project; therefore, the Arizona Department of Transportation Roadside Development Section will determine whether Arizona Department of Agriculture notification is needed. If notification is needed, the Arizona Department of Transportation Roadside Development Section will send the notification at least 60 (sixty) calendar days prior to the start of construction.

VIII. WILDLIFE CONNECTIVITY

ADOT, the AGFD, the FHWA, and representatives from other agencies have completed a Wildlife Linkages Assessment to address important wildlife movement corridors in Arizona. The AGFD Online Review Tool included a standard response regarding local or regional needs of wildlife movement, connectivity, access to habitat needs, and design of various roadway features, such as culverts and bridges.

The project is not located within the Potential Linkage Zones identified in the *Arizona Wildlife Linkages Assessment* (Arizona Wildlife Linkage Workgroup 2006).

APPENDIX C

AGENCY COORDINATION

The USFWS IPaC system and AGFD Online Review Tool were used to identify special status species potentially occurring in the area surrounding the project. IPaC and AGFD Online Review Tool results are included in this Appendix. As part of the environmental review process, a letter describing the project was also sent to the agencies below to inform them of the project and to solicit comments.

AGFD

Cheri A. Bouch r, Transportation and Project Evaluation Specialist, WMHB-Project Evaluation Program

USFWS

Steve Spangle, Field Supervisor

The AGFD responded with an email on March 28, 2017, summarized in Appendix B. The USFWS did not respond. Correspondence with these agencies is attached.

Sabra Tonn (AGFD) provided survey/occurrence records of sensitive species on April 17 and April 19, 2017, and on January 7, 2019. Jill Sherwood, AGFD Heritage Data Management System data specialist, provided further records of sensitive species on July 5, 2017. Email communications are included in this appendix.



Western Burrowing Owl Awareness

ADOT Environmental Planning Group

1611 W. Jackson St- Mail Drop EM02

Phoenix, AZ 85007

The purpose of this flyer is to provide ADOT employees and contractors, working on roadside projects, with basic knowledge to reduce the risk of incidental take of Western Burrowing Owls.

Legal Status:

Western Burrowing Owls (*Athene cunicularia*) are protected under the Federal Migratory Bird Treaty Act of 1918. All migratory birds and their parts are fully protected. They are also protected under Arizona State Law in Title 17-101, Title 17-235, and Title 17-236.

What to look for:

- Description– small, ground-dwelling owl.
- Length– 19.5-25.0 cm (7.68-9.85 inches)
- Wingspan– 58.42 cm (23.0 inches)
- Mass– about 150 grams
- Males are typically slightly larger than females.
- Round head, lacks ear tufts.
- Distinct oval facial ruff, framed by a broad, puffy white eyebrow.
- Eyes contain a bright yellow iris.

Where are owls found?

- Dry, open, short grass, treeless plains.
- Dependent on fossorial mammals. (ground squirrels, prairie dogs, badgers, etc.) to construct burrows.
- Human dominated landscapes: golf courses, airports, agricultural fields.

Identifying an active burrow:

- Owls use burrows constructed by ground squirrels, badgers, coyotes and tortoises. They can also use pipes, culverts, and ditches.
- Presence of excrement (whitewash) near entrance to burrow.
- Burrowing owls frequently decorate entrance of burrows with cow or horse manure, feathers, vegetation and trash items.

How to avoid them:

- Scan ahead prior to arriving at a sign location.
- If burrowing owls are observed within the project area, stop and move at least 100 feet beyond the owl or occupied burrow before resuming work.

If you think your work may potentially impact a Burrowing Owl or active burrow, please stop.

Move at least 100 feet from the animal or burrow before resuming work.

If you have any questions or think you have a borrowing owl or active burrow on your work site please contact:

Joshua Fife, Biologist, ADOT Environmental Planning Group, jfife@azdot.gov

Office: (602)712-6819, Mobile: (602) 622-9622, EPG General: (602)712-7767

Source: Arizona Game and Fish Department Animal Abstract: Western Burrowing Owl. Heritage Data Management System

(revised November 25, 2013)

From: Doug Miller <DMiller2@azdot.gov>
Sent: Tuesday, April 18, 2017 2:46 PM
To: Steve Hale
Cc: Edward Leon; Jerry James
Subject: RE: H7825 Invasive Species request, Interstate 10, Junction Interstate 19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 (09-301004)

Hi Stephen, Kino-Valencia was sprayed for buffle grass last summer so 75% of that is dead. The rest of I-10 is very heavy with buffle grass. 210 also has spotty populations of buffle grass. There is also small populations of star thistle spread throughout the area. Let me know if you need anything more. Doug Miller, ADOT Tech III, Tucson Landscape.

From: Steve Hale [<mailto:shale@ecoplanaz.com>]
Sent: Tuesday, April 18, 2017 9:24 AM
To: Doug Miller
Cc: Tom Ashbeck; Mike Dawson
Subject: H7825 Invasive Species request, Interstate 10, Junction Interstate 19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 (09-301004)

Hi Doug: I am preparing a biological evaluation for the Interstate 10, Junction Interstate 19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 project (Area in red on the attached figure). This project will be done in phases over several years.

Can you provide invasive weed survey results for this project?

Thank you.

Stephen Hale
Senior Project Scientist
EcoPlan Associates, Inc.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

SR210 and I-10 EA

User Project Number:

09-301004

Project Description:

The Arizona Department of Transportation (ADOT) is initiating a Design Concept Report (DCR) and Environmental Assessment (EA) for proposed Interstate 10, Junction Interstate-19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 planned improvements. The project limits on Interstate 10 (I-10) extend from the Interstate 19 (I-19) Junction at approximately milepost (MP) 260.2 eastbound to Kolb Road (MP 270.5) and the State Route 210 (SR 210) limits extends from Golf Links Road to a future planned connection with I-10 at Alvernon Way (See Figures 1 and 2). The purpose of the proposed improvements to I-10 and the extension of SR 210 to a direct connection with I-10, are to address deficiencies in the interstate highway system and provide motorists with an alternate route into Tucson's business district. The project limits fall within the jurisdictions of the City of Tucson, City of South Tucson, unincorporated Pima County, and Davis Monthan Air Force Base (U.S. Department of Defense). The U.S. Department of Defense has agreed to be a Participating Agency with the Federal Highway Administration in the preparation of a National Environmental Policy Act EA.

Project Type:

Transportation & Infrastructure, Road construction (including staging areas), Road widening (shoulders or additional or new lanes)

Contact Person:

Thomas Ashbeck

Organization:

EcoPlan Associates, Inc.

On Behalf Of:
CONSULTING

Project ID:
HGIS-04837

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

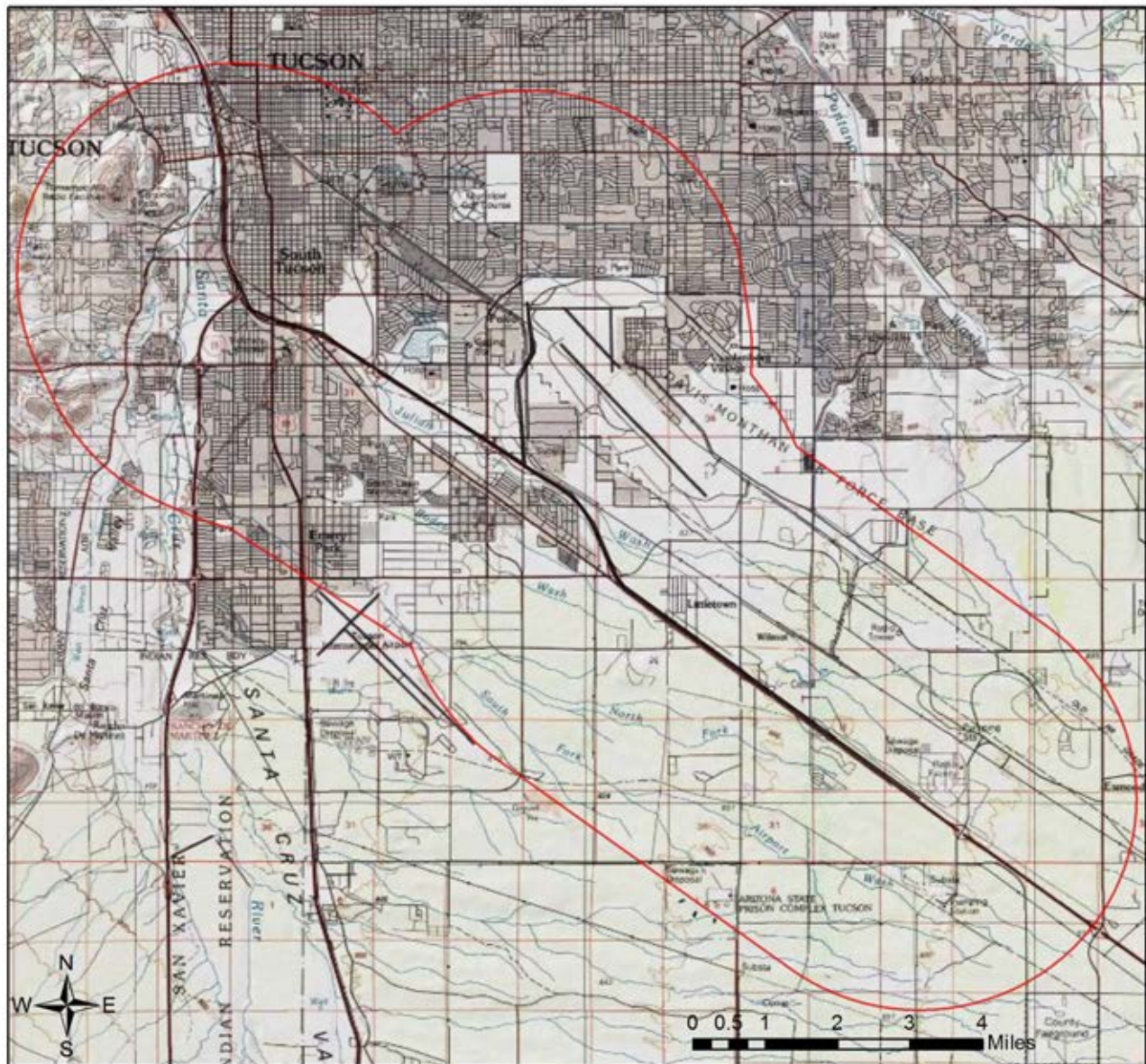
Locations Accuracy Disclaimer:

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366
Or
PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

SR210 and I-10 EA USA Topo Basemap With Locator Map



- ☐ Project Boundary
- ☐ Buffered Project Boundary

Project Size (acres): 91.86

Lat/Long (DD): 32.1495 / -110.8966

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T14S, R13E; T14S, R14E; T15S, R14E +

USGS Quad(s): TUCSON; TUCSON EAST +



Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, ©



SR210 and I-10 EA

Web Map As Submitted By User



-  Project Boundary
-  Buffered Project Boundary

Project Size (acres): 91.86

Lat/Long (DD): 32.1495 / -110.8966

County(s): Pima

AGFD Region(s): Tucson

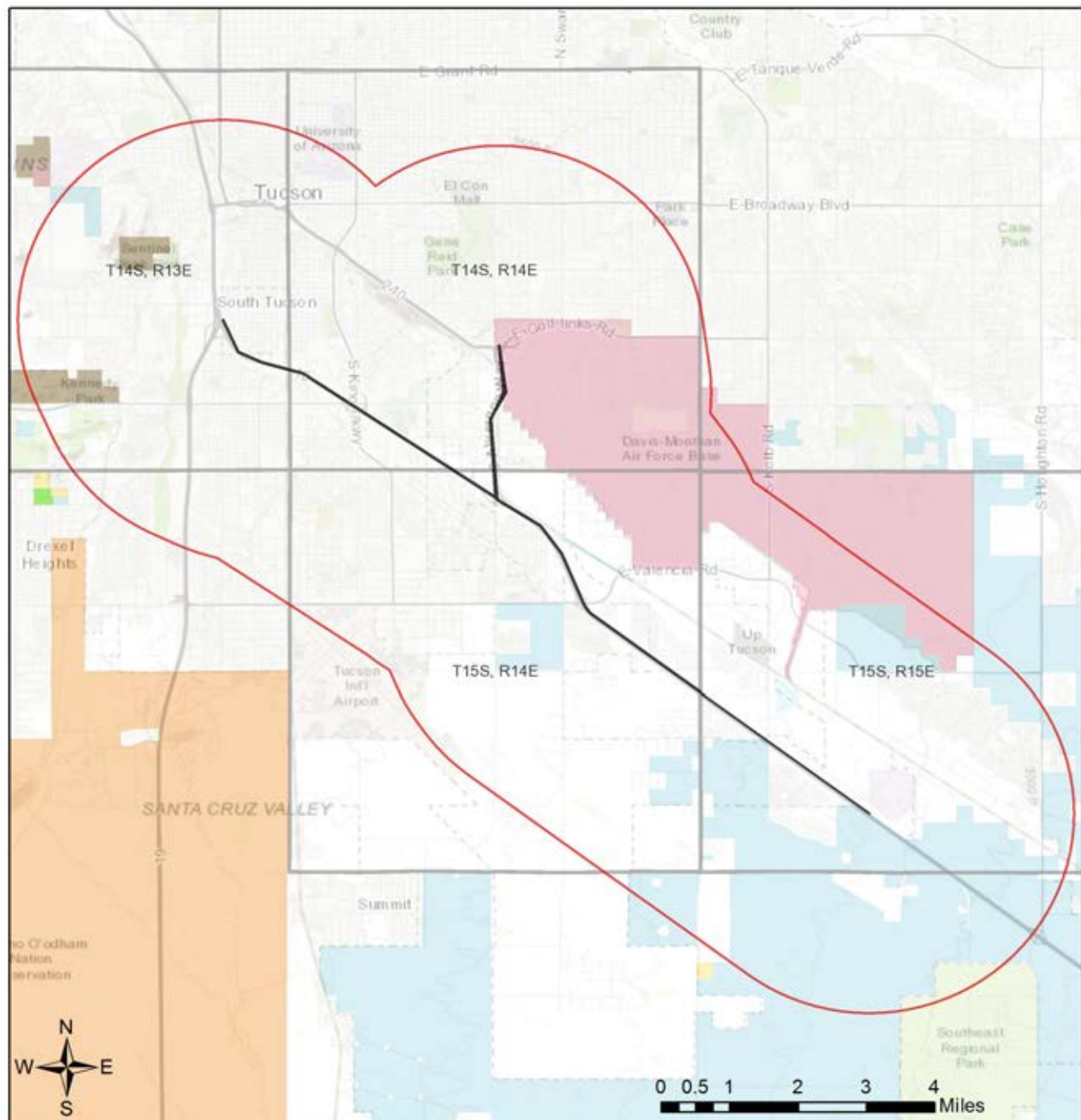
Township/Range(s): T14S, R13E; T14S, R14E; T15S, R14E +

USGS Quad(s): TUCSON; TUCSON EAST +

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

SR210 and I-10 EA

Topo Basemap with Township/Ranges, Land Ownership, Critical Habitats, Wildlife Corridors



- Project Boundary
 - Buffered Project Boundary
 - Township/Ranges
 - Wildlife Corridors
 - Critical Habitat
- Land Ownership**
- AZ Game & Fish Dept.
 - BLM
 - BOR

- Indian Res.
- Military
- Mixed/Other
- National Park/Mon.
- Private
- State & Regional Parks
- State Trust
- US Forest Service
- Wildlife Area/Refuge

Project Size (acres): 91.86

Lat/Long (DD): 32.1495 / -110.8966

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T14S, R13E; T14S, R14E; T15S, R14E +

USGS Quad(s): TUCSON; TUCSON EAST +

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

Special Status Species and Special Areas Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Antrozous pallidus</i>	Pallid Bat					
<i>Aspidoscelis stictogramma</i>	Giant Spotted Whiptail	SC	S			1B
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl	SC	S	S		1B
Bat Colony						
<i>Capsicum annuum</i> var. <i>glabriusculum</i>	Chiltepin		S			
<i>Coccyzus americanus</i>	Yellow-billed Cuckoo (Western DPS)	LT	S			1A
<i>Falco peregrinus anatum</i>	American Peregrine Falcon	SC	S	S		1A
<i>Gastrophryne olivacea</i>	Western Narrow-mouthed Toad			S		1C
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise	CCA	S	S		1A
<i>Heloderma suspectum suspectum</i>	Reticulate Gila Monster					1A
<i>Heloderma suspectum</i>	Gila Monster					1A
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			1B
<i>Lithobates yavapaiensis</i>	Lowland Leopard Frog	SC	S	S		1A
<i>Myotis velifer</i>	Cave Myotis	SC		S		1B
<i>Notiosorex cockrumi</i>	Cockrum's Desert Shrew					1B
<i>Opuntia versicolor</i>	Stag-horn Cholla				SR	
<i>Parastrellus hesperus</i>	Canyon Bat					
<i>Peucaea carpalis</i>	Rufous-winged Sparrow					1B
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					1B
<i>Tumamoca macdougallii</i>	Tumamoc Globeberry		S	S	SR	

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

**Species of Greatest Conservation Need
Predicted within 3 Miles of Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Aix sponsa</i>	Wood Duck					1B
<i>Ammospermophilus harrisi</i>	Harris' Antelope Squirrel					1B
<i>Anaxyrus retiformis</i>	Sonoran Green Toad			S		1B
<i>Anthus spragueii</i>	Sprague's Pipit	SC				1A
<i>Antrostomus ridgwayi</i>	Buff-collared Nightjar		S			1B
<i>Aquila chrysaetos</i>	Golden Eagle	BGA		S		1B
<i>Aspidoscelis stictogramma</i>	Giant Spotted Whiptail	SC	S			1B
<i>Aspidoscelis xanthonota</i>	Red-backed Whiptail	SC	S			1B
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl	SC	S	S		1B
<i>Botaurus lentiginosus</i>	American Bittern					1B
<i>Buteo regalis</i>	Ferruginous Hawk	SC		S		1B
<i>Buteo swainsoni</i>	Swainson's Hawk					1C

**Species of Greatest Conservation Need
Predicted within 3 Miles of Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Calypte costae</i>	Costa's Hummingbird					1C
<i>Chilomeniscus stramineus</i>	Variable Sandsnake					1B
<i>Cistothorus palustris</i>	Marsh Wren					1C
<i>Colaptes chrysoides</i>	Gilded Flicker			S		1B
<i>Coluber bilineatus</i>	Sonoran Whipsnake					1B
<i>Corynorhinus townsendii pallescens</i>	Pale Townsend's Big-eared Bat	SC	S	S		1B
<i>Crotalus tigris</i>	Tiger Rattlesnake					1B
<i>Cynanthus latirostris</i>	Broad-billed Hummingbird		S			1B
<i>Cyprinodon macularius</i>	Desert Pupfish	LE				1A
<i>Dipodomys spectabilis</i>	Banner-tailed Kangaroo Rat			S		1B
<i>Empidonax wrightii</i>	Gray Flycatcher					1C
<i>Euderma maculatum</i>	Spotted Bat	SC	S	S		1B
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat	SC		S		1B
<i>Falco peregrinus anatum</i>	American Peregrine Falcon	SC	S	S		1A
<i>Glaucidium brasilianum cactorum</i>	Cactus Ferruginous Pygmy-owl	SC	S	S		1B
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise	CCA	S	S		1A
<i>Haliaeetus leucocephalus</i>	Bald Eagle	SC, BGA	S	S		1A
<i>Heloderma suspectum</i>	Gila Monster					1A
<i>Hypsiglena sp. nov.</i>	Hooded Nightsnake					1B
<i>Incilius alvarius</i>	Sonoran Desert Toad					1B
<i>Kinosternon sonoriense sonoriense</i>	Desert Mud Turtle			S		1B
<i>Lasiurus blossevillii</i>	Western Red Bat		S			1B
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			1B
<i>Leopardus pardalis</i>	Ocelot	LE				1A
<i>Leptonycteris yerbabuenae</i>	Lesser Long-nosed Bat	SC				1A
<i>Lepus alleni</i>	Antelope Jackrabbit					1B
<i>Lithobates yavapaiensis</i>	Lowland Leopard Frog	SC	S	S		1A
<i>Macrotus californicus</i>	California Leaf-nosed Bat	SC		S		1B
<i>Melanerpes uropygialis</i>	Gila Woodpecker					1B
<i>Melospiza lincolni</i>	Lincoln's Sparrow					1B
<i>Melospiza aberti</i>	Abert's Towhee		S			1B
<i>Micrathene whitneyi</i>	Elf Owl					1C
<i>Micruroides euryxanthus</i>	Sonoran Coralsnake					1B
<i>Myiarchus tyrannulus</i>	Brown-crested Flycatcher					1C
<i>Myotis occultus</i>	Arizona Myotis	SC		S		1B
<i>Myotis velifer</i>	Cave Myotis	SC		S		1B
<i>Myotis yumanensis</i>	Yuma Myotis	SC				1B
<i>Notiosorex cockrumi</i>	Cockrum's Desert Shrew					1B

**Species of Greatest Conservation Need
Predicted within 3 Miles of Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					1B
Oreoscoptes montanus	Sage Thrasher					1C
Oreothlypis luciae	Lucy's Warbler					1C
Panthera onca	Jaguar	LE				1A
Passerculus sandwichensis	Savannah Sparrow					1B
Peucaea carpalis	Rufous-winged Sparrow					1B
Phrynosoma solare	Regal Horned Lizard					1B
Phyllorhynchus browni	Saddled Leaf-nosed Snake					1B
Poeciliopsis occidentalis occidentalis	Gila Topminnow	LE				1A
Progne subis hesperia	Desert Purple Martin			S		1B
Setophaga petechia	Yellow Warbler					1B
Sonorella papagorum	Black Mountain Talussnail					1B
Sphyrapicus nuchalis	Red-naped Sapsucker					1C
Spizella breweri	Brewer's Sparrow					1C
Sturnella magna	Eastern Meadowlark					1C
Tadarida brasiliensis	Brazilian Free-tailed Bat					1B
Terrapene ornata	Ornate Box Turtle					1A
Toxostoma lecontei	LeConte's Thrasher			S		1B
Troglodytes pacificus	Pacific Wren					1B
Vireo bellii arizonae	Arizona Bell's Vireo					1B
Vulpes macrotis	Kit Fox	No Status				1B

Species of Economic and Recreation Importance Predicted within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Callipepla squamata	Scaled Quail					1C
Odocoileus hemionus	Mule Deer					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Transportation & Infrastructure, Road construction (including staging areas), Road widening (shoulders or additional or new lanes)

Project Type Recommendations:

Fence recommendations will be dependant upon the goals of the fence project and the wildlife species expected to be impacted by the project. General guidelines for ensuring wildlife-friendly fences include: barbless wire on the top and bottom with the maximum fence height 42", minimum height for bottom 16". Modifications to this design may be considered for fencing anticipated to be routinely encountered by elk, bighorn sheep or pronghorn (e.g., Pronghorn fencing would require 18" minimum height on the bottom). Please refer to the Department's Fencing Guidelines located on Wildlife Friendly Guidelines page, which is part of the Wildlife Planning button at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information <https://www.azgfd.com/hunting/regulations>.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Design culverts to minimize impacts to channel geometry, or design channel geometry (low flow, overbank, floodplains) and substrates to carry expected discharge using local drainages of appropriate size as templates. Reduce/minimize barriers to allow movement of amphibians or fish (e.g., eliminate falls). Also for terrestrial wildlife, washes and stream corridors often provide important corridors for movement. Overall culvert width, height, and length should be optimized for movement of the greatest number and diversity of species expected to utilize the passage. Culvert designs should consider moisture, light, and noise, while providing clear views at both ends to maximize utilization. For many species, fencing is an important design feature that can be utilized with culverts to funnel wildlife into these areas and minimize the potential for roadway collisions. Guidelines for culvert designs to facilitate wildlife passage can be found on the home page of this application at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Based on the project type entered, coordination with U.S. Army Corps of Engineers may be required (<http://www.usace.army.mil/>)

Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

The Department requests further coordination to provide project/species specific recommendations, please contact Project Evaluation Program directly. PEP@azgfd.gov

Project Location and/or Species Recommendations:

HDMS records indicate that one or more native plants listed on the Arizona Native Plant Law and Antiquities Act have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture

1688 W Adams St.

Phoenix, AZ 85007

Phone: 602.542.4373

<https://agriculture.az.gov/environmental-services/np1>

HDMS records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <http://www.fws.gov/southwest/es/arizona/> or:

Phoenix Main Office

2321 W. Royal Palm Rd, Suite 103

Phoenix, AZ 85021

Phone: 602-242-0210

Fax: 602-242-2513

Tucson Sub-Office

201 N. Bonita Suite 141

Tucson, AZ 85745

Phone: 520-670-6144

Fax: 520-670-6155

Flagstaff Sub-Office

SW Forest Science Complex

2500 S. Pine Knoll Dr.

Flagstaff, AZ 86001

Phone: 928-556-2157

Fax: 928-556-2121

HDMS records indicate that Western Burrowing Owls have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at:

<https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.

HDMS records indicate that Sonoran Desert Tortoise have been documented within the vicinity of your project area.

Please review the Tortoise Handling Guidelines found at: <https://www.azgfd.com/wildlife/nongamemanagement/tortoise/>

From: Project Evaluation Program <PEP@azgfd.gov>
Sent: Tuesday, March 28, 2017 2:45 PM
To: Mike Dawson; Project Evaluation Program
Cc: 'Sarah Karasz'; 'jwhite@azdot.gov'; Maria Altemus; Project Evaluation Program
Subject: RE: I-10, Jct I-19 to Kolb Rd and SR210, Golf Links to I-10 ADOT # H7825

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Mike,
My apologies on running behind on my response to you.
Then Department does not have any significant comments at this time, but would like to be kept in the loop as the project moves forward (i.e. we would like to review a Draft of the DCR and EA when they are prepared).

Regards,

Cheri A. Bouchér

Project Evaluation Program Specialist
Arizona Game & Fish Department- WMHB
5000 W Carefree Highway
Phoenix AZ 85086-5000
623-236-7615
cboucher@azgfd.gov



From: Mike Dawson [<mailto:mdawson@ecoplanaz.com>]
Sent: Tuesday, February 21, 2017 2:33 PM
To: Project Evaluation Program
Cc: 'Sarah Karasz'; 'jwhite@azdot.gov'; Maria Altemus
Subject: I-10, Jct I-19 to Kolb Rd and SR210, Golf Links to I-10 ADOT # H7825

Ms. Bouchér;
On behalf of Sarah Karasz of the Arizona Department of Transportation Environmental Planning Group, please see the attached scoping letter for the referenced Interstate 10 widening/ traffic interchange improvements and State Route 210 extension to I-10 in metro Tucson and Pima County. As the letter notes, we would appreciate receipt of your comments by March 21, 2017.

Thank you.

Mike Dawson
President - Arizona Association of Environmental Professionals
Senior Environmental Planner

EcoPlan Associates
78 W. Cushing Street
Tucson, Az. 85701
520.624.4326 ext. 177
520.423.3950 (fax)
520.403.9614 (cell)
480.733.6666 ext. 177 (Mesa office)

From: Sabra Tonn <stonn@azgfd.gov>
Sent: Monday, January 07, 2019 8:08 PM
To: Maria Altemus
Cc: Matthew King
Subject: Re: FW: H7825 I-10/SR210 Species Occurrences

Maria,

For western yellow bat, there are several records within 5 miles including east near the Air Force Base (2015), a historic record near Himmel Park, and at a residence south of the Tucson Airport (2007). The records from 2017 are SE of Vail along the River.

Western burrowing owl: lots of records in all directions, some along the road shoulder on the northern third of the project. I have records through May 2017, but we haven't received any of the 2018 data yet.

Sonoran desert tortoise: Records up through 2012 for the Tumamoc area. I have no data from 2017 - 2018 added. Unless you are in the bajadas or foothills of the small hills/mountains, I would not anticipate the project negatively affecting this species.

Pima pineapple cactus: We have records for 2017 south of the project area closer to Vail. I do not have any along the roadway for the project area. This project is to the NE edge of their currently known distribution range. Nothing east of I-10 along that stretch, but north of I-10 near Vail. The closest record along I-10 is about 3 miles SE of the project.

Giant spotted whiptail: 2006-2010 about 1 mile west of the northern part of the project; west of the river.

Yellow-billed cuckoo: up through 2017 near the Cienega Creek Preserve. 2013 from Kino Sports Complex area and also 2007 at a residence about 1.7 miles to the north of the project area.

American peregrine falcon: 2017 near Reid Park (others in area in eBird from 2015-2017 as breeding) and near Sentinel Park. Many non-breeding records in eBird for the project area.

Lowland Leopard frog: refugia pond to the west of the project area along West Branch of Santa Cruz River. Data from 2006-2012. Historic record along I-19 west of the airport.

Cave myotis: 2005 near canal bridge at Country Club Rd. 2015 on east end of Air Force Base. Historic record at old Wilmot Interchange on Hwy 80.

Again, please know that we have not received any of the 2018 data from Scientific Collecting Licenses or final reports from any formal surveys or studies conducted during 2018.

Sabra

On Mon, Jan 7, 2019 at 2:35 PM Maria Altemus <maltemus@ecoplanaz.com> wrote:

Hi Sabra,

Just wondering if you had a chance to review the occurrence records for the referenced project. At this point, I think the only species that I really need survey/occurrence records for is the Western yellow bat. Also, if there are any new surveys/records since September 2017 for the following species: Pima pineapple cactus, burrowing owl, and desert tortoise. Thank you!

All the best,

Maria M. Altemus, M.S.

Environmental Planner/Biologist

EcoPlan Associates, Inc.

3610 N. Prince Village Place, Suite 140

Tucson, AZ 85719

Office: (520) 624-4326, ext. 111

Cell: (520) 256-4748

From: Maria Altemus
Sent: Monday, December 31, 2018 11:59 AM
To: 'Sabra Tonn'
Subject: H7825 I-10/SR210 Species Occurrences

Hi Sabra,

I'm working on a BE for H7825 I-10/SR210 (HGIS-04837) and was hoping to get some updated information on species occurrences near the project area. Steve Hale had previously inquired about species occurrences for this project last year, however, we are getting closer to submitting the BE at this point, and need some updated info. If you could please give occurrence information for the following species, it would be super helpful.

Giant spotted whiptail

Western burrowing owl

Yellow-billed cuckoo

Sonoran Desert tortoise

Pima pineapple cactus

American peregrine falcon

Lowland leopard frog

Cave myotis

Thank you very much and happy new year!

All the best,

Maria M. Altemus, M.S.

Environmental Planner/Biologist

EcoPlan Associates, Inc.

3610 N. Prince Village Place, Suite 140

Tucson, AZ 85719

Office: (520) 624-4326, ext. 111

Cell: (520) 256-4748

--



From: Sabra Tonn <STonn@azgfd.gov>
Sent: Monday, April 17, 2017 2:37 PM
To: Steve Hale
Subject: RE: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

See below.

From: Steve Hale [<mailto:shale@ecoplanaz.com>]
Sent: Friday, April 14, 2017 10:17 AM
To: Sabra Tonn <STonn@azgfd.gov>
Subject: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

Hi Sabra: I am working on a BE for a multi-phase project to improve I-10 and associated Tis from I-19 to Kolb Road and SR 210 from Golf Links Road to I-10. The AGFD tool Project ID: HGIS-04837 indicates the following species within 3 miles of the project area:

Giant Spotted Whiptail **Santa Cruz River area. Observations from 2000 – 2010 from Scientific Collecting Permits. Within one mile to the west.**

Western Burrowing Owl **Large populations on Davis Monthan Air Force Base. As well as many other small sites (14 sites) within 150 meters to 2 miles of the road – central part of the project has population near Kino Sports Complex within 150 meters.**

Yellow-billed Cuckoo **1.9 miles to the north 2007-07-10: bird captured and released at home near xeroriparian corridor for Santa Cruz River.**

Pima Pineapple Cactus **Only one within search area is about 2 miles to the SW of Road from 1985 near junction of Nogales Hwy and S Fletcher Road. The survey was done because of work on “aqueduct route” that never was built. Single plant seen, no idea if it is still alive.**

Western Narrow-mouthed Toad **Multiple records within search distance (7 on far NW end of project near the Santa Cruz) and another west of Alvernon north of I-10. All from 1000 to 2000 meters from road. Dates range from 2004 - 2010.**

Sonoran Desert Tortoise **over 2 miles to the NW of the NW end of project. Area includes Tumamoc Hill and west through the Tucson Mountains. Nothing near the road in project area.**

Reticulate Gila Monster **About 2 miles to the NW of NW end of project near Sentinel Peak Park from 2013-07-14.**

Cave Myotis **About 2.6 miles to the ESE of SE end of project. Railroad bridge. Surveys in 1999 and 2011 show bats utilizing bridge – 3 species and over 400 counted.**

Stag-horn Cholla **6 sites all over 2 miles to the NW of the NW end of project. Areas includes Tumamoc Hill, Sentinel Peak Park, Greasewood Park, Pima CC and surrounding areas. Dates range from 1984 – 1999.**

Tumamoc Globeberry **7 sites all over 2 miles to the NW of the NW end of project. Areas includes Tumamoc Hill, Sentinel Peak Park, Greasewood Park, Pima CC and surrounding areas. Dates range from 1984 – 2014.**

As well as at least one Bat Colony See cave myotis record. Also 4 more along NW end of road. Ajo Way Bridge near Sprots Complex, Country Club Bridge, and bridge at 36th st east of Palo Verde all in 1999-04-13: S Wolf and W Shaw, 2002, roost selection of bridges by bats in an urban area, Heritage Grant #U98007. Another area within 100-1000 meters of road from Kino Pkwy to point where the road runs north (NW end of project), there is an area that includes netting records and roosts along Julian Wash at several brdiges. All from same source as other bridges, some are maternity colonies.

With the exception of the stag-horn which I would anticipate is probably present, if uncommonly, adjacent to the project limits, could you provide location information for the remaining species. Since the project is getting close to the northern edge of the distribution of the Pima pineapple cactus in the area, I would be particularly interested in records near the project.

Thank you for any information you may be able to provide.

Stephen Hale
Senior Project Scientist
EcoPlan Associates, Inc.

From: Sabra Tonn <STonn@azgfd.gov>
Sent: Wednesday, April 19, 2017 3:33 PM
To: Steve Hale
Subject: RE: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

From: Steve Hale [<mailto:shale@ecoplanaz.com>]
Sent: Tuesday, April 18, 2017 4:38 PM
To: Sabra Tonn <STonn@azgfd.gov>
Subject: RE: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

Hi Sabra: I want to be sure I understand the bridge bat colony information you sent.

Are the Ajo Way and Country Club bridges both along I-10? Ajo Bridge is East of Kino Pkwy and north of I-10. Country Club is about a mile north of I-10.

Is the 'bridge at 36th St. east of Palo Verde' still south of SR 210? It is just south of 210, but in the same general mass transportation interchange. Burrowing owl in the same general area too.

Thank you. Steve

From: Sabra Tonn [<mailto:STonn@azgfd.gov>]
Sent: Monday, April 17, 2017 2:37 PM
To: Steve Hale
Subject: RE: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

See below.

From: Steve Hale [<mailto:shale@ecoplanaz.com>]
Sent: Friday, April 14, 2017 10:17 AM
To: Sabra Tonn <STonn@azgfd.gov>
Subject: Sensitive species in the area of I-10, I-19 to Kolb Road and SR 210, Golf Links Road to I-10

Hi Sabra: I am working on a BE for a multi-phase project to improve I-10 and associated Tis from I-19 to Kolb Road and SR 210 from Golf Links Road to I-10. The AGFD tool Project ID: HGIS-04837 indicates the following species within 3 miles of the project area:

Giant Spotted Whiptail Santa Cruz River area. Observations from 2000 – 2010 from Scientific Collecting Permits. Within one mile to the west.

Western Burrowing Owl Large populations on Davis Monthan Air Force Base. As well as many other small sites (14 sites) within 150 meters to 2 miles of the road – central part of the project has population near Kino Sports Complex within 150 meters.

Yellow-billed Cuckoo 1.9 miles to the north 2007-07-10: bird captured and released at home near xeroriparian corridor for Santa Cruz River.

Pima Pineapple Cactus Only one within search area is about 2 miles to the SW of Road from 1985 near junction of Nogales Hwy and S Fletcher Road. The survey was done because of work on “aqueduct route” that never was built. Single plant seen, no idea if it is still alive.

Western Narrow-mouthed Toad Multiple records within search distance (7 on far NW end of project near the Santa Cruz) and another west of Alvernon north of I-10. All from 1000 to 2000 meters from road. Dates range from 2004 - 2010.

Sonoran Desert Tortoise over 2 miles to the NW of the NW end of project. Area includes Tumamoc Hill and west through the Tucson Mountains. Nothing near the road in project area.

Reticulate Gila Monster About 2 miles to the NW of NW end of project near Sentinel Peak Park from 2013-07-14.

Cave Myotis About 2.6 miles to the ESE of SE end of project. Railroad bridge. Surveys in 1999 and 2011 show bats utilizing bridge – 3 species and over 400 counted.

Stag-horn Cholla 6 sites all over 2 miles to the NW of the NW end of project. Areas includes Tumamoc Hill, Sentinel Peak Park, Greasewood Park, Pima CC and surrounding areas. Dates range from 1984 – 1999.

Tumamoc Globeberry 7 sites all over 2 miles to the NW of the NW end of project. Areas includes Tumamoc Hill, Sentinel Peak Park, Greasewood Park, Pima CC and surrounding areas. Dates range from 1984 – 2014.

As well as at least one Bat Colony See cave myotis record. Also 4 more along NW end of road. Ajo Way Bridge near Sprots Complex, Country Club Bridge, and bridge at 36th st east of Palo Verde all in 1999-04-13: S Wolf and W Shaw, 2002, roost selection of bridges by bats in an urban area, Heritage Grant #U98007. Another area within 100-1000 meters of road from Kino Pkwy to point where the road runs north (NW end of project), there is an area that includes netting records and roosts along Julian Wash at several brdiges. All from same source as other bridges, some are maternity colonies.

With the exception of the stag-horn which I would anticipate is probably present, if uncommonly, adjacent to the project limits, could you provide location information for the remaining species. Since the project is getting close to the northern edge of the distribution of the Pima pineapple cactus in the area, I would be particularly interested in records near the project.

Thank you for any information you may be able to provide.

Stephen Hale
Senior Project Scientist
EcoPlan Associates, Inc.

From: Jill Sherwood <JSherwood@azgfd.gov>
Sent: Wednesday, July 05, 2017 3:28 PM
To: Steve Hale
Cc: Sabra Tonn; Tom Ashbeck
Subject: RE: Additional species for HGIS 04837

Stephen,

Sabra asked me to work this up for you so I've included the information that you requested below:

Lowland leopard frog (*Lithobates yavapaiensis*)

The closest population is a Refugia site thru USFWS ~1.25 miles to the W of Northern portion of project that was last surveyed in 2012. Stocked in 2006. The refugia sites don't typically show up on the ERT so we'll correct that so it doesn't show up on future reports.

An egg mass was found ~2.5 miles to the N. of the Alvernon Way portion of the project during a survey in 2006.

Several populations were surveyed in 2009 ~6 - 8 miles NE of the project near Box Canyon area.

A large population surveyed between 1993 – 2014 is located ~9 miles to the SE in Cienega Creek.

Populations were also found ~6.5 miles to the N. in Rillito Creek area during a 2009 survey.

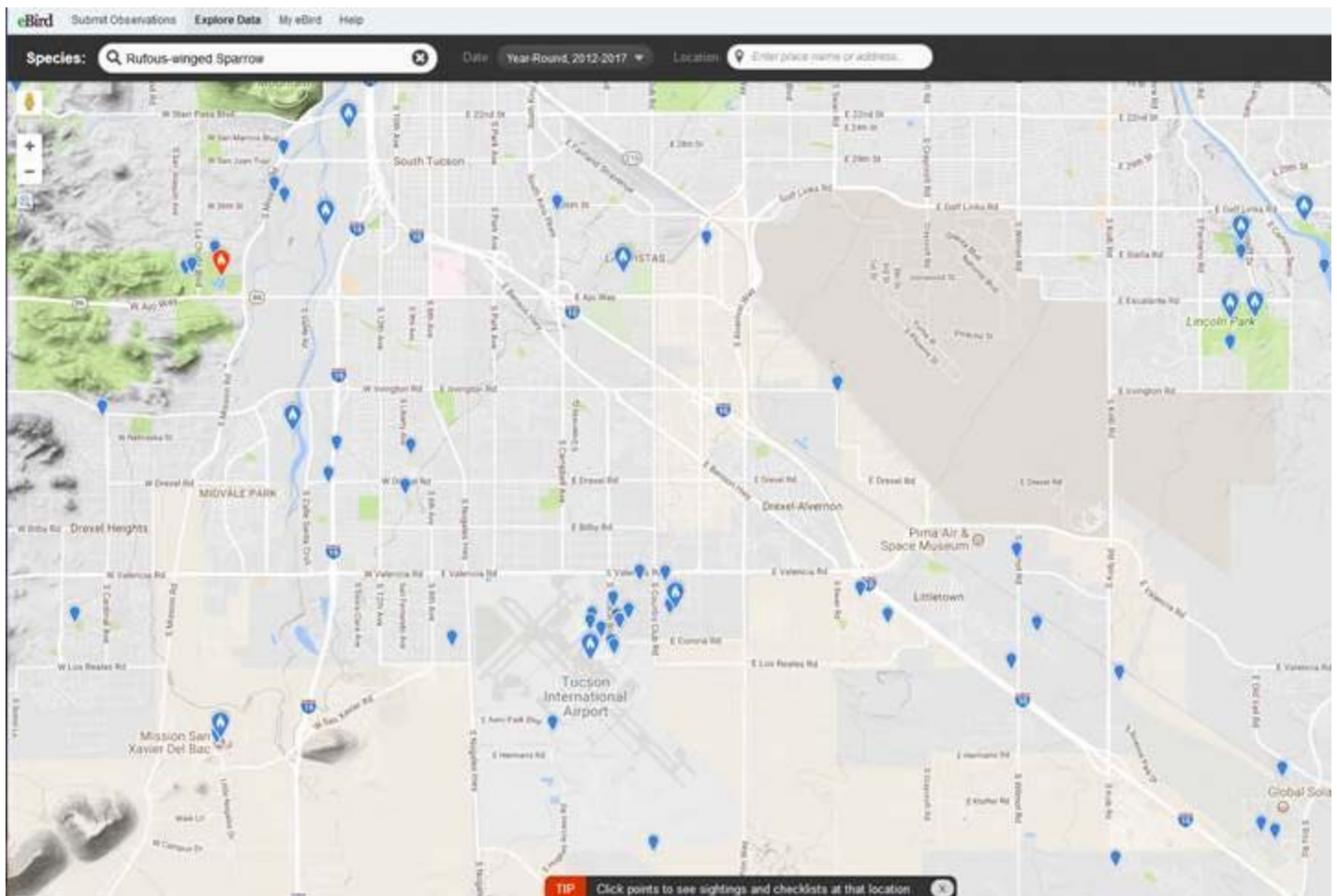
Cockrums desert shrew (*Notiosorex cockrumi*):

2.6 miles SE of project near I-10 and Houghton Rd. Last surveyed in 2003.

Rufous-winged sparrow (*Peucaea carpalis*):

2 observations from 1967: ~200 – 300 meters to the W of project area and also ~0.8 miles to the E of project area.

There are also more recent year-round observations over the past 5 years that were reported on eBird throughout the project area. See below:



Brazilian free-tailed bat (*Tadarida brasiliensis*):

Several Maternity/Nesting Colonies found in 1999 at various bridges in Julian Wash 100 – 700 meters S. of project area between I-19 and Kino Way.

3 more roosts were observed at the northern portion of project area between I-10 and Alvernon Way from surveys in 1999.

~0.25 miles to the N. of I-10 at bridge near Kino Sport Complex.

~1 miles to the NE of I-10 just W of Davis-Monthan AFB canal bridge.

~0.5 miles to E. of project. W of Davis-Monthan AFB canal bridge.

Another roost observed in 1994 ~2 miles to N. of the project area near Tucson City Hall.

At the southern portion of the project, a roost was observed ~2.5 miles to the SE. of the project area at Houghton RR Bridge. Last surveyed 2011.

Please let me know if you have any further questions.

–Jill

Jill Sherwood
 HDMS Data Specialist
 AZ Game and Fish Department
 Phoenix, Arizona
 623.236.7686
jsherwood@azgfd.gov

From: Steve Hale [<mailto:shale@ecoplanaz.com>]
Sent: Thursday, June 29, 2017 4:52 PM
To: Sabra Tonn <STonn@azgfd.gov>
Cc: Tom Ashbeck <tashbeck@ecoplanaz.com>
Subject: Additional species for HGIS 04837

Hi Sabra: I recently updated the environmental tool report for the Interstate 10, Junction Interstate 19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 project (HGIS 04837) and found 4 species not present on the original tool including:

Lowland leopard frog

Cockrums desert shrew

Rufous-winged sparrow

And Brazilian free-tailed bat

Could you provide locality information for these species. Thank you for your help.

Stephen Hale
Senior Project Scientist
EcoPlan Associates, Inc.



February 21, 2017

Mr. Steve Spangle
Field Supervisor
Attn: Bob Lehman, ADOT Liaison
US Fish and Wildlife Service
9828 N. 31st Ave., #C3
Phoenix, AZ 85051-2517

Submitted by email to incomingazcorr@fws.gov

RE: 010-E(210)A
010 PM 260 H7825 01L
Interstate 10, Junction Interstate 19 to Kolb Road
and State Route 210, Golf Links Road to Interstate 10
IPaC Consultation Code: 02EAAZ00-2017-SLI-0250

Dear Mr. Spangle:

The Arizona Department of Transportation (ADOT) is initiating a Design Concept Report (DCR) and an Environmental Assessment (EA) for proposed improvements to Interstate 10 (I-10) from Junction Interstate 19 (I-19) to Kolb Road and to State Route (SR) 210 from Golf Links Road to I-10. The project limits on I-10 extend from the I-19 Junction at approximately milepost (MP) 260.2 eastbound to east of Kolb Road (MP 271.8), and the SR 210 limits extends from Golf Links Road to a future planned connection with I-10 at Alvernon Way (see Figures 1, 2, 3a, and 3b). The project limits fall within the jurisdictions of the City of Tucson, the City of South Tucson, unincorporated Pima County, and Davis-Monthan Air Force Base (U.S. Department of Defense). The DCR/EA phase is a continuation of the 2015 Feasibility Study, which looked at improvement alternatives on I-10 out to SR 83 (Figure 2). Based on the results of that study, two alternatives and the no build option are being evaluated for I-10 from I-19 to Kolb Road and on SR 210 from Golf Links Road to a connection with I-10 at Alvernon Way.

The U.S. Department of Defense and the Federal Aviation Administration have been invited to be cooperating agencies with the Federal Highway Administration in the preparation of the EA. Within the project limits, I-10 consists of a six-lane divided highway (three through lanes in each direction) from I-19 to Kino Parkway and a four-lane divided highway (two through lanes in each direction) from Kino Parkway to Kolb Road. The I-10 right-of-way ranges from 200 to 300 feet within the project limits. SR 210 (also known as Aviation Parkway) extends from downtown Tucson as a four-lane divided highway (two through lanes in each direction), terminating at Golf Links Road. The need for improvements identified in the Feasibility Study include:

- A lack of north-south arterial options to deliver traffic to the downtown business district
- Poor operation performance and high crash rates at the I-10 traffic interchanges (TIs) due to spacing and outdated design types

- The current capacity of I-10 would not meet projected traffic growth
- A high percentage of travel on I-10 is for local trips rather than through traffic

The purpose of the proposed improvements is to address deficiencies in the interstate highway system and provide motorists with an alternative route into the City of Tucson's downtown business district. The two build alternatives differ in their concepts for widening I-10. System Alternative I (Figure 3a) adds through lanes to I-10, while System Alternative IV (Figure 3b) creates a Collector-Distributor (C-D) roadway from Alvernon Way to Kolb Road. A C-D roadway is a supplemental facility between freeway main lanes and the frontage roads. Their primary purpose is to move weaving and lane-changing traffic from the high-speed traffic on the freeway. The C-D roadways accommodate local traffic, allowing freeway main lanes to function as an expressway for higher-speed through traffic. The extension of SR 210 along the Alvernon Way alignment is identical under the System I and System IV alternatives, creating a limited access roadway with a system interchange connection to I-10.

In general, the major project improvements would include:

- Widening I-10 (additional through lanes and/or C-D roadway concept)
- Extending SR 210 to I-10 along the Alvernon Way alignment
- Eliminating the Palo Verde Road TI
- Adding a new TI at Country Club Road
- Replacing or widening existing bridges along I-10
- Improving existing TIs and crossroads

Project construction would be phased over 10 to 20 years, as funding becomes available. Currently programmed projects focus on TI improvements at I-10/Kino Parkway, I-10/Park Avenue, and constructing a new TI at I-10/Country Club Road. The DCR and the EA are scheduled to be completed in March 2019. The results of the DCR and the EA would allow ADOT to determine logical project segments, phasing construction over multiple years.

If you or others in your agency have specific concerns, suggestions, or recommendations regarding this project, such as information on wildlife movement, habitat issues, or seasonal concerns, please let us know.

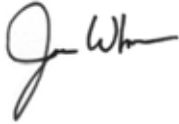
Please submit your comments or concerns by March 21, 2017, to ADOT c/o Michael R. Dawson via email at mdawson@ecoplanaz.com; by phone at 480.733.6666, ext. 177; by fax at 480.383.6915; or mail them to:

Arizona Department of Transportation
c/o Michael R. Dawson
EcoPlan Associates, Inc.

78 W. Cushing St.
Tucson, AZ 85701

Thank you for your time and assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin White". The signature is fluid and cursive, with the first name "Justin" written in a larger, more prominent script than the last name "White".

Justin White
Biology Program Manager
ADOT Environmental Planning

Enclosures: Figure 1–Project location
 Figure 2–Project vicinity
 Figure 3a–System Alternative I
 Figure 3b–System Alternative IV

c: Ammon Heier, Federal Highway Administration
Tremaine Wilson, Federal Highway Administration
Sarah Karasz, ADOT Environmental Planning
Rudy Perez, ADOT Statewide Project Management
Brad Olbert, Jacobs Engineering Inc.
Michael R. Dawson, EcoPlan Associates, Inc.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3

Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513
<http://www.fws.gov/southwest/es/arizona/>
http://www.fws.gov/southwest/es/EndangeredSpecies_Main.html



In Reply Refer To:

November 08, 2018

Consultation Code: 02EAAZ00-2017-SLI-0250

Event Code: 02EAAZ00-2019-E-00313

Project Name: SR 210 and I-10 EA

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that may occur within one or more delineated United States Geological Survey 7.5 minute quadrangles with which your project polygon intersects. Each quadrangle covers, at minimum, 49 square miles. In some cases, a species does not currently occur within a quadrangle but occurs nearby and could be affected by a project. Please refer to the species information links found at:

http://www.fws.gov/southwest/es/arizona/Docs_Species.htm

<http://www.fws.gov/southwest/es/arizona/Documents/MiscDocs/AZSpeciesReference.pdf>.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to consult with us if their projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, we recommend preparing a biological evaluation similar to a Biological Assessment to determine whether the project may

affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat may be affected by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. You should request consultation with us even if only one individual or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream effects. If the Federal action agency determines that the action may jeopardize a proposed species or adversely modify proposed critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend considering them in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 et seq.). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1026 species of birds are protected by the MBTA, including species such as the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls are often found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle (or golden eagle) nest occurs in or near the proposed project area, you should evaluate your project to determine whether it is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles:

<https://www.fws.gov/migratorybirds/pdf/management/>

[nationalbaldeaglenagementguidelines.pdf](https://www.fws.gov/migratorybirds/pdf/management/nationalbaldeaglenagementguidelines.pdf)

<https://www.fws.gov/birds/management/managed-species/eagle-management.php>.

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following: <https://www.fws.gov/birds/policies-and-regulations/incidental-take.php>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital

television, radio, and emergency broadcast) can be found at:

<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/communication-towers.php>.

Activities that involve streams (including intermittent streams) and/or wetlands are regulated by the U.S. Army Corps of Engineers (Corps). We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program <https://www.azgfd.com/Wildlife/HeritageFund/>.

For additional communications regarding this project, please refer to the consultation Tracking Number in the header of this letter. We appreciate your concern for threatened and endangered species. If we may be of further assistance, please contact our following offices for projects in these areas:

Northern Arizona: Flagstaff Office 928/556-2001

Central Arizona: Phoenix office 602/242-0210

Southern Arizona: Tucson Office 520/670-6144

Sincerely,

/s/ Steven L. Spangle Field Supervisor

Attachment

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

Project Summary

Consultation Code: 02EAAZ00-2017-SLI-0250

Event Code: 02EAAZ00-2019-E-00313

Project Name: SR 210 and I-10 EA

Project Type: TRANSPORTATION

Project Description: The Arizona Department of Transportation (ADOT) is initiating a Design Concept Report (DCR) and Environmental Assessment (EA) for proposed Interstate 10, Junction Interstate-19 to Kolb Road and State Route 210, Golf Links Road to Interstate 10 planned improvements. The project limits on Interstate 10 (I-10) extend from the Interstate 19 (I-19) Junction at approximately milepost (MP) 260.2 eastbound to Kolb Road (MP 270.5) and the State Route 210 (SR 210) limits extends from Golf Links Road to a future planned connection with I-10 at Alvernon Way (See Figures 1 and 2). The purpose of the proposed improvements to I-10 and the extension of SR 210 to a direct connection with I-10, are to address deficiencies in the interstate highway system and provide motorists with an alternate route into Tucson's business district. The project limits fall within the jurisdictions of the City of Tucson, City of South Tucson, unincorporated Pima County, and Davis Monthan Air Force Base (U.S. Department of Defense). The U.S. Department of Defense has agreed to be a Participating Agency with the Federal Highway Administration in the preparation of a National Environmental Policy Act EA.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/32.14239100357922N110.89166522845572W>



Counties: Pima, AZ

Endangered Species Act Species

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Jaguar <i>Panthera onca</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3944	Endangered

Birds

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is proposed critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Northern Mexican Gartersnake <i>Thamnophis eques megalops</i> There is proposed critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7655	Threatened
Sonoyta Mud Turtle <i>Kinosternon sonoriense longifemorale</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7276	Endangered

Flowering Plants

NAME	STATUS
Pima Pineapple Cactus <i>Coryphantha scheeri var. robustispina</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4919	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.