



# **Final Environmental Assessment**

**I-10, Junction I-19 to Kolb Road  
and SR 210, Golf Links Road to I-10,  
Pima County, Arizona**

**010-E(210)S**

**010 PM 260 H7825 01L**

## **Errata Sheet**

**August 2020**

*The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by the Arizona Department of Transportation (ADOT) pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated April 16, 2019, and executed by the Federal Highway Administration and ADOT.*

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Arizona Department of Transportation

FINDING OF NO SIGNIFICANT IMPACT

for

I-10, Junction I-19 to Kolb Road  
and SR 210, Golf Links Road to I-10

010-E(210)S

010 PM 260 H7825 01L

The Arizona Department of Transportation (ADOT) has determined that this project will not have any significant impact on the human or natural environment. This finding of no significant impact is based on the attached environmental assessment, which has been evaluated and determined to adequately discuss the environmental issues and impacts of the project. The environmental assessment provides sufficient evidence and analysis for ADOT to determine that an environmental impact statement is not required. ADOT takes full responsibility for the accuracy, scope, and content of the attached environmental assessment.

DocuSigned by:  
Approved by: Paul O'Brien  
69D3A817999345F...

Paul O'Brien, PE  
Administrator, Environmental Planning  
Arizona Department of Transportation

Date: 8/6/2020

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

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**Acronyms and Abbreviations**


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ADOT	Arizona Department of Transportation
CFR	Code of Federal Regulations
DCR	Design Concept Report
EA	Environmental Assessment
FHWA	Federal Highway Administration
FY	fiscal year
I-10	Interstate 10
I-10/SR 210	I-10, Junction I-19 to Kolb Road and SR 210, Golf Links Road to I-10
I-19	Interstate 19
Kino Sports Complex	Kino Veterans Memorial Sports Complex
LOS	Level-of-Service
NEPA	National Environmental Policy Act
PAG	Pima Association of Governments
ROW	right-of-way
SR	State Route
TI	traffic interchange
TIP	Transportation Improvement Program
UA Tech Park	University of Arizona Science and Technology Park
U.S.	United States
U.S.C.	U.S. Code
USDOT	U.S. Department of Transportation

**I.****Introduction****Project Description**

The Arizona Department of Transportation (ADOT) plans to construct improvements to Interstate 10 (I-10) from Interstate 19 (I-19) to Kolb Road and to provide an extension of State Route (SR) 210 from Golf Links Road to I-10 in the city of Tucson, the city of South Tucson, and unincorporated Pima County, Arizona. Land uses in the area consist of rural, residential, commercial, industrial, office, recreational, governmental services, and Planned Area Development. Major facilities include Davis-Monthan Air Force Base, Tucson International Airport, Aerospace Research Park, the Tucson Electric Power plant, HEP Refining (bulk fuel oil storage facility), Southern Arizona Veteran's Administration Health Care System (hospital), Banner-University Medical Center South, Kino Veterans Memorial Sports Complex (Kino Sports Complex), Tucson Marketplace, University of Arizona Science and Technology Park (UA Tech Park), Tucson Rodeo Grounds, and an Amazon Fulfillment Center.

A Draft Environmental Assessment (EA) was prepared to document the potential environmental impacts of the I-10, Junction I-19 to Kolb Road and SR 210, Golf Links Road to I-10 (I-10/SR 210) project. The Draft EA was made available for public review and comment from October 29 through December 12, 2019. The Draft EA, which evaluates the Recommended Build Alternative and the No-Build Alternative, addresses I-10 between I-19 and Kolb Road, approximately 11.5 miles, and the connection of I-10 to SR 210 along the alignment of Alvernon Way, approximately 3.5 miles. Based on the current preliminary design, the width of the I-10 mainline right-of-way (ROW) for the Recommended Build Alternative will range from approximately 350 to 400 feet; however, the width of the ROW will vary widely at the traffic interchanges (TIs). The ROW of the SR 210 extension mainline will be approximately 200 feet wide but will expand at the Ajo Way intersection.

The I-10/SR 210 project will be separated into smaller projects for construction to be implemented over a 15- to 20-year period, as funding is available. The design of the first two projects, the I-10 TIs at Kino Parkway and Country Club Road, is included in the current Pima Association of Governments (PAG) 2020–2024 Five-year Transportation Improvement Plan (TIP)(PAG 2019). The TIP lists the I-10/Kino Parkway TI for design in fiscal year (FY) 2021–2022 and the I-10/Country Club Road TI for design in 2022. ROW and utility relocation work could begin the year following design, with construction to follow the year after that.

The Arizona State Transportation Board–approved 2020–2024 Statewide TIP includes funding for the I-10/SR 210 Corridor Study identified as TIP No. 753.00, I-10 East Corridor Design Concept Report (DCR) (I-19 East to Kolb Road). The I-10/SR 210 study has been assigned Federal No. 010-E(210)S and ADOT Project No. 010 PM 260 H7825 01L. Based on the results of the DCR and coordination with the region, future funding needs and priorities will be established. Two projects related to the study are programmed: I-10 Country Club TI, TIP No. 74.07, with \$8 million programmed in FY 2022 for design; and I-10 Kino Parkway TI, TIP No. 39.13, with \$8 million programmed in FY 2021–2022 for design and utilities (PAG 2019).

**Summary of the Draft Environmental Assessment**

The Draft EA for the I-10/SR 210 project was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States [U.S.] Code 4321 et seq.), and Council on Environmental Quality regulations that implement NEPA (40 Code of Federal Regulations [CFR] 1500–1508), with ADOT acting as the lead agency. 23 U.S. Code (U.S.C.). 327 established a Surface Transportation Project Delivery Program that allows the Secretary of the U.S. Department of

Transportation (USDOT) to authorize states to assume the USDOT responsibility under NEPA. The Federal Highway Administration (FHWA) and ADOT executed the NEPA Assignment Memorandum of Understanding on April 16, 2019. This allows ADOT to be the lead federal agency on the project. The FHWA participated as joint lead agency in planning and preparing technical and environmental documents prior to signing the Memorandum of Understanding. The NEPA process provides steps and procedures to evaluate the potential social, economic, and environmental impacts of the I-10/SR 210 project, and provides an opportunity for the public; federal, state, and local agencies; and tribes to provide input and/or comments through a scoping and public involvement process.

The Draft EA was completed and approved by ADOT on October 24, 2019. The document was made available for public review and comment from October 29 through December 12, 2019, during business hours at three public repositories (Littleton Community Center, Joel D. Valdez Main Library, and Sam Lena-South Tucson Public Library) and on the I-10/SR 210 project website at [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study). The general public, government agencies, elected officials, tribes, and other interested parties had an opportunity to provide comments on the Draft EA in writing by mail, email, or through the project website.

ADOT held a public hearing for the I-10/SR 210 project at the Billy L. Lauffer Middle School in Tucson on November 20, 2019. Advertisements were published in two newspapers: the *Arizona Daily Star* (in English) on October 29, 2019, and *La Estrella* (in Spanish) on November 1, 2019. The advertisements provided an overview of the project, information on how to provide comments on the Draft EA, and an invitation to the public to attend the public hearing.

During the public hearing, written and oral comments on the project were recorded between 5:30 and 7:30 p.m. Written comments could also be provided on comment sheets, and oral comments could be made to designated court reporters in both English and Spanish. All comments submitted at the hearing were assembled in the *I-10/SR 210 Public Involvement Summary for November 2019 Public Hearing*, which is attached (Attachment 1) for review as part of this Final EA.

This Final EA provides ADOT's responses to public and agency comments made during the comment period and public hearing. It also provides additional information, data, or revisions to the Draft EA, where necessary, and is intended to be used in conjunction with the Draft EA. This Final EA includes:

- List of mitigation measures to be undertaken by ADOT and the designated construction contractor
- Errata, providing revisions to the Draft EA
- *I-10/SR 210 Public Involvement Summary for November 2019 Public Hearing* (Attachment 1), containing:
  - Public hearing notification
  - Public hearing format
  - Public hearing presentation materials and other hearing materials
  - Public comment summary
  - Agency and public comments received and ADOT responses
  - Public hearing transcript
- List of existing load-bearing structures referenced in the mitigation measures



- Revised right-of-way acquisition table, which updates the table provided in the Draft EA
- Section 4(f) notifications, concurrences, and communications regarding Joint Planning and *de minimis* impacts (Attachment 4), containing:
  - Section 4(f) signed concurrence by the official with jurisdiction regarding potential new road across Julian Wash Greenway Trail
  - Section 4(f) signed notification form demonstrating cooperation and joint planning between the project team and the Kino Sports Complex official with jurisdiction
  - Project meeting notes regarding Kino Sports Complex
  - Project team correspondence with Kino Sports Complex
- Final Air Quality Technical Report, which updates the version included in the Draft EA

With the completion of this Final EA and the issuance of a Finding of No Significant Impact by ADOT, the NEPA requirements for this project have been met.

### **Selected Alternative**

The first phase of the 2010 ADOT and FHWA–commissioned study for the I-10/SR 210 project was a feasibility study and environmental overview that evaluated seven System Alternatives for improving I-10 and extending SR 210 to I-10. The resulting report, *I-10, Junction I-19 to SR 83 and SR 210, Golf Links Road to Interstate 10 Feasibility Report Update* (ADOT 2015), recommended three build alternatives to be carried forward for further evaluation, I-10/SR 210 System Alternatives I, II, and IV, and the others were eliminated from consideration. After subsequent review by the stakeholders, System Alternative II was also eliminated from consideration. System Alternatives I and IV were carried forward for further evaluation in the Design Concept Study phase.

Based on a detailed evaluation of System Alternatives I and IV in the Design Concept Study, System Alternative I was selected as the Recommended Build Alternative for the following reasons:

- System Alternative I will provide a slightly better Level-of-Service (LOS) than System Alternative IV at a cost that is \$88 million less than System Alternative IV.
- System Alternative I will have less of an impact on adjacent property owners, with less land taken and fewer properties affected. System Alternative I will provide better access to commercial properties between Alvernon Way and Kolb Road.
- Both alternatives provide excellent safety improvements, better spacing between TIs, reduced congestion, and improved LOS.
- Agency and public response supported System Alternative I largely due to unfamiliarity with the collector-distributor concept in System Alternative IV.
- Environmental concerns are nearly identical between the two alternatives. System Alternative IV would relocate a short stretch (approximately 250 feet) of the Rodeo Wash trail. System Alternative I will not impact the trail.

As the Recommended Build Alternative, System Alternative I and the No-Build Alternative were carried forward for detailed analysis in the Draft EA. The No-Build Alternative served as a baseline for comparing project implementation with maintaining the status quo.

The I-10/SR 210 improvements are needed to address traffic operations deficiencies, meet future travel demands, and provide improved vehicular connectivity to downtown Tucson. The purpose of the project will be met by adding capacity to I-10 to meet future year 2040 traffic demands, improving operational characteristics of the I-10 TIs between I-19 and Kolb Road, and providing a direct connection between I-10 and SR 210.

Based on the results of the I-10/SR 210 project engineering and environmental studies, and the public and agency comments received on the Draft EA and from the public hearing, ADOT has approved the Recommended Build Alternative evaluated in the Draft EA as the Selected Alternative.

**II.****Environmental Commitments**

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ADOT and the contractor shall follow the federal laws and regulations, guidelines, and the ADOT standards and specifications listed below for all relevant environmental resources:

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
- Uniform Relocation Act Amendments of 1987
- ADOT *Right of Way Procedures Manual*
- Title VI of the Civil Rights Act of 1964
- ADOT *Construction Manual*
- ADOT *Public Involvement Plan*
- ADOT *Air Quality Guidebook for Transportation Conformity*
- ADOT *Clean Water Act Guidance Manual*
- ADOT Temporary Traffic Control Design Guidelines
- ADOT *Erosion and Pollution Control Manual for Highway Design and Construction*
- ADOT *Noise Abatement Requirements*
- ADOT *Standard Specifications for Road and Bridge Construction*
- SAF-6.01 Asbestos Management Policy
- ADOT *Roadside Vegetation Management Guidelines*

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**III.****Mitigation Measures**

Mitigation measures have been defined to avoid or minimize the environmental impacts of the project. Global changes made to the mitigation measures from the Draft EA for the Selected Alternative include changing “would” to “will” for ADOT responsibilities. In addition, all references to “would” in connection with the contractor’s responsibilities have been changed to “shall.” All of the following mitigation measures apply and will be implemented during all phases of construction. The mitigation measures listed below supersede the mitigation measures from the Draft EA and are not subject to change without prior written approval from ADOT.

**Arizona Department of Transportation Design Responsibilities**

- During final design, the Arizona Department of Transportation will coordinate with emergency response and transit providers (Arizona Department of Public Safety, City of Tucson Police Department, Pima County Sheriff’s Department, South Tucson Police Department, City of Tucson Fire Department, City of South Tucson Fire Department, Rural Metro Fire Department, Southern Arizona Veterans Hospital, Banner-University Medical Center South, and Sun Tran), and Tucson Unified School District and Sunnyside Unified School District to accommodate emergency and transit needs in the Transportation Management Plan (see Draft EA page 49).
- The Arizona Department of Transportation Southcentral District will coordinate with the Sunnyside School District to develop pedestrian or traffic control measures related to Craycroft Road and truck traffic through the Littletown community, as warranted (see Draft EA page 57).
- During final design, the Arizona Department of Transportation will coordinate with the Pima County Project Management Office to minimize the temporary impacts of the Julian Wash Greenway Trail (see Draft EA page 67).
- Where feasible, the noise barriers required as mitigation measures will be constructed as early as possible in the construction phasing to shield adjacent properties from construction-related noise (see Draft EA page 78).
- During final design, Arizona Department of Transportation Environmental Planning will determine Clean Water Act Section 404 and Section 401 permitting needs (see Draft EA page 86).
- Site-specific environmental site assessments will be conducted prior to property acquisition, as recommended in the June 2019 Preliminary Initial Site Assessment (see Draft EA page 93).

**Arizona Department of Transportation 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 (see Draft EA page 90).
- 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 (see Draft EA page 90).

### **Arizona Department of Transportation Southcentral District Responsibilities**

- 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 (see Draft EA page 90).
- The contractor shall complete a National Emissions Standards for Hazardous Air Pollutants notification for the work associated with demolition or modification of the structures listed in the attached Existing Load-Bearing Structures table (Attachment 2, Existing Load-Bearing Structures) and submit it to the Arizona Department of Transportation Environmental Planning hazardous materials coordinator (602.920.3882 or 602.712.7767) for a five (5) working day review and approval. Upon approval, the contractor shall file the notification with the Pima County Department of Environmental Quality prior to commencement of work associated with demolition or modification (see Draft EA page 94). The contractor cannot start work associated with the demolition or modification of the structures listed in the attached Existing Load-Bearing Structures table until 10 (ten) working days have passed since the submittal of the notification to the Pima County Department of Environmental Quality (see Draft EA page 93).

### **Contractor Responsibilities**

- The contractor shall contact the ADOT Environmental Planning Historic Preservation Team (602.712.6371 or 602.712.2343) at least 10 (ten) business days prior to the start of ground-disturbing activities to arrange for qualified personnel to monitor and be present during construction (see Draft EA page 63).
- If vegetation clearing shall 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 (see Draft EA page 90).
- 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 (see Draft EA page 90).
- 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 (see Draft EA page 90).
- 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 United States Fish and Wildlife Service to relocate burrowing owls from the study area, as appropriate (see Draft EA page 90).

- 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 (see Draft EA page 90).
- 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 study area (see Draft EA page 91).
- 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 (see Draft EA page 91).
- 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 (see Draft EA page 91).
- The contractor shall comply with all terms and conditions of the Clean Water Act Section 404 and Section 401 permit and certification (adopted subsequent to Draft EA).
- The contractor shall complete a National Emissions Standards for Hazardous Air Pollutants notification for the work associated with demolition or modification of the structures listed in the attached Existing Load-Bearing Structures table (Attachment 2, Existing Load-Bearing Structures) and submit it to the Arizona Department of Transportation Environmental Planning hazardous materials coordinator (602.920.3882 or 602.712.7767) for a five (5) working day review and approval. Upon approval, the contractor shall file the notification with the Pima County Department of Environmental Quality prior to commencement of work associated with demolition or modification (see Draft EA page 94). The contractor cannot start work associated with the demolition or modification of the structures listed in the attached Existing Load-Bearing Structures table until 10 (ten) working days have passed since the submittal of the notification to the Pima County Department of Environmental Quality (see Draft EA page 93).

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**IV.****Errata from Draft Environmental Assessment**

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This section contains additions or changes to the Draft EA to revise, clarify, or make corrections to the text, and this document should be used in conjunction with the Draft EA.

These changes are the result of public comments and are provided below with reference to the page numbers of the original text in the Draft EA. Deleted text is identified with strikethrough (~~strikethrough~~) and new or revised text appears in red italics (*italics*). Where applicable, the entire paragraph from the Draft EA has been included to provide context for the changes.

The following global changes apply to all text in the Draft EA:

- “Proposed project” has been changed to “project.”
- “Recommended Build Alternative” has been changed to “Selected Alternative.”
- References to “would” with regard to the project and/or Selected Alternative have been changed to “will.”

Revised mitigation measures are provided in Section II, Mitigation Measures, of this Final EA. A table of Existing Load-Bearing Structures is now referenced in the Mitigation Measures and inserted in this Final EA as Attachment 2.

The contents of the Draft EA, Appendix B, have been updated to reflect new information on ROW acquisitions. Revised tables of ROW acquisitions are included in this Final EA Errata Sheet as Attachment 3.

On June 3, 2020, the Pima County official with jurisdiction concurred with the U.S. Department of Transportation Act Section 4(f) determination for the potential new road across Julian Wash Greenway Trail. The signed concurrence is included in this Final EA Errata Sheet as Attachment 4.

On February 25, 2020, the Pima County official with jurisdiction signed the notification form demonstrating that cooperation and joint planning had taken place between the project team and the Kino Sports Complex. The signed form, meeting notes, and team correspondence with the Kino Sports Complex are included in this Final EA Errata as Attachment 4.

The Draft Air Quality Technical Report included in the Draft EA, Appendix F, has been updated. The Final Air Quality Technical Report is included in this Final EA Errata Sheet as Attachment 5.

No revisions, clarifications, or corrections were required for the following section of the Draft EA, other than the global changes noted above:

- Part VI, References

## Introduction

The following updates were made to Part I, Introduction, of the Draft EA.

### C. Project Background and Overview

*(Page 6 of the Draft EA)*

Original plans for SR 210 called for a connection at the west end at I-10 and St. Mary's Road. The I-10/St. Mary's Road connection had been delayed for several years; however, in 2008 the City of Tucson approved the I-10 west end link. Construction of this last ~~mile~~ **1.3 miles** from Broadway Road to I-10 is scheduled to begin in late ~~2019~~ **spring 2020**. This last ~~mile~~ **1.3 miles**, which ~~has~~ **have** been renamed Downtown Links, is not a part of this project. In 2010, ADOT and the FHWA commissioned the preparation of a two-phased study to define and evaluate future safety and capacity improvements to I-10 from the junction with I-19 to the junction with SR 83. The study also included the extension of SR 210 from Golf Links Road to a connection with I-10 at a location to be determined. The study and potential future construction are programmed in the ADOT Fiscal Year (FY) 2019–2022 Statewide Transportation Improvement Program (STIP). The STIP identifies the following projects: East Corridor Design Concept Report I-19 East to Kolb Road (current Design Concept Report [DCR]/EA phase), I-10 Country Club Road TI (FY 2022), and I-10 Kino Parkway TI (FY 2021–2022). The FY 2020–2024 Pima Association of Governments (PAG) Transportation Improvement Program (TIP) identifies the I-10/Country Club Road TI as TIP ID-No. 74.07 (*Note: the TIP project funding is identified as \$8 million for design; no construction funding is identified*) and the I-10 Kino Parkway TI as TIP ID No. 39.13 (TIP funding is listed as \$1,914,000 for Utilities and \$6,086,000 for design).

### Project Purpose and Need

The following updates were made to Part II, Project Purpose and Need, of the Draft EA.

#### A. Need

##### ***Safety***

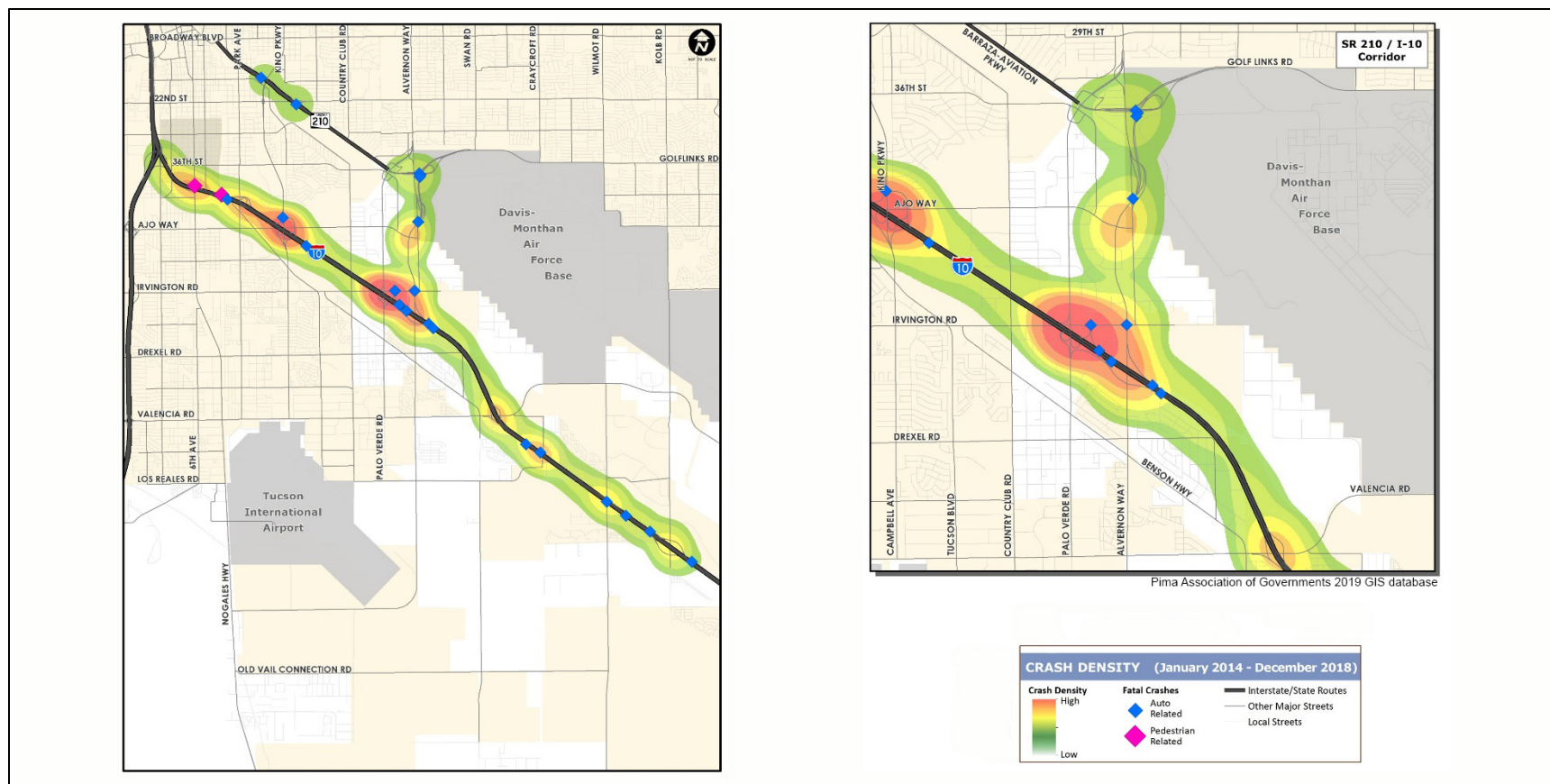
*(Pages 10–13 of the Draft EA)*

East of the system interchange with I-19, I-10 was constructed in the 1960s as a rural interstate freeway with rural design criteria and typically only two lanes of traffic in each direction. Several of the TIs (Park Avenue, Kino Parkway, and Palo Verde Road) include loop on-/off-ramps that have short ramp weave distances that adversely impact traffic operational efficiency and safety. Several interchanges are spaced closer together than the current recommended minimum of one mile, thus reducing weaving distances between successive ramps and contributing to reduced operational efficiency and crashes. As traffic volumes increase over time, the operational efficiency of the existing ramps will continue to degrade.

Crash data analysis accomplished for the FS and updated for the DCR demonstrated that annual crash rates on I-10 within the project limits have ~~been increasing~~ *increased since 2014*. Some of these crashes may be attributed to the old 1960s design of I-10 and the interchanges (Table 1).

**Table 1. 5-year crash summary (~~July 2011~~  
~~January 2014–June 2016~~ *December 2018*)**

Year	Total Crashes
<del>July 2011–June 2012</del> <i>2014</i>	<del>335</del> <i>427</i>
<del>July 2012–June 2013</del> <i>2015</i>	<del>372</del> <i>496</i>
<del>July 2013–June 2014</del> <i>2016</i>	<del>393</del> <i>552</i>
<del>July 2014–June 2015</del> <i>2017</i>	<del>470</del> <i>515</i>
<del>July 2015–June 2016</del> <i>2018</i>	<del>486</del> <i>485</i>
<b>Total</b>	<del>2,056</del> <b><i>2,475</i></b>



## Need Summary

(Page 17 of the Draft EA)

The Initial DCR (ADOT 2019b) identified the following needs associated with the project:

- **Traffic Capacity and Operation**—Projected traffic growth will exceed the current capacity of I-10 and result in unacceptable LOS. Projected traffic growth by 2040 will result in substantive motorist delay times reflected as LOS E and F for I-10 without improvements (Figure 8). This is unacceptable for a regional transportation system.
- **Safety**—The I-10 TIs have poor operational performance and high crash rates due to spacing and outdated design types. As shown in Figure 5, there is a high rate of crashes and fatalities associated with the close spacing of loop ramp designed TIs. In addition, there is a high rate of crashes at the SR 210 connection to Alvernon Way.
- **Transportation System Connectivity**—There is a lack of north–south arterial options to deliver traffic to the downtown business district, resulting in local trips using I-10 for downtown access. ~~The proposed I-10 improvements and the SR 210 extension are needed to provide improved connectivity to downtown Tucson, address the traffic operations deficiencies, and meet future travel demands. Much of I-10 within the project limits is over 40 years old, and the interstate lacks the capacity to handle projected traffic volume increases. Poor operational performance, high crash rates, and future capacity needs must be addressed. The extension of SR 210 to a connection with I-10 will provide improved access from I-10 to downtown Tucson, a primary travel destination.~~

*The proposed I-10 improvements and the SR 210 extension are needed to provide improved connectivity to downtown Tucson, address the traffic operations deficiencies, and meet future travel demands. Much of I-10 within the project limits is over 40 years old, and the interstate lacks the capacity to handle projected traffic volume increases. Poor operational performance, high crash rates, and future capacity needs must be addressed. The extension of SR 210 to a connection with I-10 will provide improved access from I-10 to downtown Tucson, a primary travel destination.*

## C. Conformance with Regulations, Land Use Plans, and Other Plans

### ***Transportation Plans/Studies***

*(Page 19 of the Draft EA)*

#### • Sonoran Corridor Tier 1 EIS

In May 2017, the FHWA and ADOT initiated the environmental review process for the Sonoran Corridor, a potential new transportation corridor that would connect I-19 to I-10 south of Tucson International Airport. A Tier 1 EIS is being prepared as part of this process in accordance with NEPA and other regulatory requirements. A future connection point with I-10 is expected to be east of Kolb Road in the vicinity of Rita Road. Coordination between the I-10/SR 210 and Sonoran Corridor study teams will be ongoing. Based on the preliminary Sonoran Corridor schedule, corridor alternatives are not expected until ~~late 2019~~ **early 2020** (ADOT 2019c).

### **Alternatives**

The following updates were made to Part III, Alternatives, of the Draft EA.

## B. Alternatives Considered

### ***System Alternative I***

#### *I-10 Mainline Improvements*

*(Page 28 of the Draft EA)*

From I-19 to west of Kino Parkway, the intent of the design is to retain the existing pavement, widen as additional lanes are needed, and retain the existing I-10 vertical profile. East of Kino Parkway, I-10 would have a new vertical profile, which would be designed to accommodate overpass structure replacements at the TIs and a new structure over Country Club Road (see System I Preliminary Plan Sheets at [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study)). The new TI at Country Club Road would alter local access in the southwest quadrant (residential properties). Missouri Street would be closed at Country Club Road. Neighborhood access would be replaced via Irvington Road with an extension of either Bentley Avenue or Treat Avenue to Irvington Road. Continued coordination with the City of Tucson in final design will determine the preferred connection. Either road option would connect with Missouri Street to reestablish neighborhood access (see Figure 2a: Detail 2). This would result in out-of-way travel of about a half-mile for ingress and egress from the neighborhood. ***Access to Julian Wash Greenway Trail south of I-10 at County Club Road will be maintained through reconstruction of the multi-use path ramps on both sides of Country Club Road.***

### ***Build Alternatives***

#### *Right-of-Way*

*(Page 33 of the Draft EA)*

ROW requirements are the same for both alternatives for I-10 between I-19 and Alvernon Way and for SR 210. The differences in ROW between the two alternatives occur between Alvernon Way and Kolb Road. Because System Alternative IV would have a wider pavement section than System Alternative I, more ROW would be required for System Alternative IV. System Alternative I requires ~~180~~ **179** parcels and about 160.6 acres, while System Alternative IV **would** requires ~~191~~ **190** parcels and about 175.3 acres.

*ADOT will coordinate with the City of Tucson regarding ROW acquisitions and relocations within its jurisdiction. Coordination will allow City representatives to assist in mitigating impacts or providing direction from a planning and development perspective.*

## **C. General Project Schedule**

*(Page 35 of the Draft EA)*

The Initial DCR ~~has been approved. Approval of the EA is subject to public review.~~ *was approved in October 2019, and Final DCR approval is pending.* After satisfactory public review, the EA ~~would be approved~~ *The EA has been subject to public review and comment, as documented in Chapter V. The result is this Final EA* and a Finding of No Significant Impact. ~~would be issued in mid-2020.~~ Because the I-10/SR 210 project will cost over a billion dollars, it will be separated into smaller projects for construction. An implementation plan was developed as a part of the DCR. The plan included 18 projects that ~~would~~ *will* be implemented over a 15- to 20-year period (Table 2). The timing of the projects ~~would~~ *will* be dependent on availability of funding *and further coordination with the PAG region.* The design of the first two projects, the I-10 TIs at Kino Parkway and Country Club Road, are included in the current PAG 2018–2022 5-year TIP. The selection of the first project will be determined by the Regional Transportation Authority as part of its review of the DCR. The current PAG 2018–2022 TIP shows the I-10/Kino Parkway TI being designed in FY 2021–2022 and the I-10/Country Club Road TI being designed in 2022. ROW and utility relocation work could begin the year following design, with construction to follow the year after that (PAG 2018).

## **Affected Environment, Environmental Consequences, and Mitigation/Commitments**

The following updates were made to Part IV, Affected Environment, Environmental Consequences, and Mitigation/Commitments, of the Draft EA.

## **B. Land Ownership, Jurisdiction, and Land Use**

### ***Existing Conditions***

#### ***Future Development Plans***

*(Pages 41 and 42 of the Draft EA)*

The proposed SR 210 extension corridor along Alvernon Way is developed. There is minimal vacant land, and the current industrial zoning is expected to result in limited further development from Golf Links Road to I-10. The I-10 corridor from I-19 to Kolb Road falls mostly within the City of Tucson *Rincon/Southeast Sub-regional Plan* (updated in 2005). The plan limits extend from Kino Parkway southeast to Houghton Road, well beyond the I-10 project limits. Several major planned developments are underway, with ongoing activity driven by market demand. Commercial ventures at The Bridges and Century Park Marketplace (I-10 and Kino Parkway vicinity) are well underway, with available vacant land for further development. La Estancia, a major residential development off I-10 between Wilmot Road and Kolb Road, ~~is underway and opening three~~ *continues* new housing phases in ~~2019~~ *2020*. *The City of Tucson is reviewing a potential 70-acre residential development plan at I-10 and Wilmot Road (Blackhawk Property).* The UA Tech Park is expected to continue to grow, and the new Amazon Fulfillment Center will continue to attract employment and additional housing demand in the near term.



## ***Environmental Impacts—Selected Alternative***

### ***Future Land Use***

*(Page 43 of the Draft EA)*

The Selected Alternative is consistent with planned future land use. The affected jurisdictions recognize the need for improved I-10 capacity and operations and the extension of SR 210 to better serve downtown Tucson. The improved transportation facility will better serve the growing population and employment sectors along the project corridors. The ROW acquisition at SR 210 and the Golf Links Road vicinity will remove 25 businesses. Redevelopment in this area will be minimal due to lack of access with the new bridge and ramp configurations. Along I-10, much of the land to be acquired will be portions of parcels, leaving a viable remainder with access to frontage roads or cross streets available for development. Future development of vacant properties in the I-10 corridor will not be negatively impacted. The Craycroft TI proposed improvements could impact future development plans for vacant land held by Triple T Truck Stop. Though no development plans are currently in place, ADOT will coordinate with the Triple T Truck Stop to limit potential impacts as the project advances in design.

*Coordination with the Blackhawk Property (I-10 and Wilmot Road) and the City of Tucson will also continue as the project advances in design.*

## **C. Social and Economic Considerations**

### ***Existing Conditions***

#### ***Social Services, Schools, Recreation***

*(Page 46 of the Draft EA)*

The Kino Sports Complex abuts I-10 just east of Kino Parkway. Currently, the baseball portion of the facility hosts baseball teams for tournaments and seasonal training events. The soccer portion of the complex is the home host for the United Soccer League *FC Tucson* team and provides a winter training facility for several Major League Soccer teams from around the United States. The baseball and soccer facilities also host local Tucson teams and a variety of entertainment events (e.g., concerts, charity functions, gem and mineral show). The complex is currently undergoing an expansion on the south side of I-10 to increase soccer capabilities to become a nationally recognized tournament venue. *The Phase 1 of the south complex was completed in January 2020. Future expansion includes will include a new roadway tunnel under I-10 to provide access to both sides of the sports complex.*

## **D. Title VI and Environmental Justice**

### ***Conclusion***

*(Page 57 of the Draft EA)*

*Area residents, business owners, employees, customers, suppliers, and motorists using the transportation network in the study area will benefit to varying degrees from the positive impacts of improving the interstate, enhancing state route capacity, improving connectivity to downtown, improving operation of the TIs, improving traffic flow and access in the region, and reducing congestion and its associated impacts on air quality and vehicular noise. Though the positive effects of widening the interstate and TIs would most directly apply to the operation of personal and commercial vehicles, trucks, and buses, the project would enhance the movement of people, goods, and services throughout the region, which would benefit all residents. The project would also improve other modes of transportation by opening up interstate crossings with wider roadways, and constructing bike paths and sidewalks.*



It is expected that all *area* residents *and users of the transportation system* of the area will experience short-term impacts, such as noise, vibration, dust, and temporary street restrictions or closures, during construction. *However, these construction-related impacts will be temporary, and traffic control plans will be implemented to maintain access to schools, parks, emergency services, commercial properties, and neighborhoods throughout construction. The previously stated long-term benefits of the project to the region's transportation system are considered to outweigh short-term, temporary, construction-related impacts.* All residents will benefit from the positive impacts of improving the interstate, state route capacity, improved connectivity to downtown, and improved operation of TIs.

## F. Section 4(f) Resources

### **Existing Conditions**

#### *Kino Sports Complex*

*(Page 65 of the Draft EA)*

The Pima County Stadium District is in the process of a 144-acre expansion of the sports complex south of I-10. Phase I is ~~underway~~ *opened in January 2020* and includes facilities for 12 natural grass, sand-based multi-use fields, 20 pickleball courts, and related infrastructure, including concessions, lockers, and an area for players and vendors. Phase 2 expansion plans will begin around 2025 to include additional soccer fields, a stadium, and commercial facilities.

To connect the existing complex north of I-10 to the expansion, an underpass has been incorporated into the proposed I-10 improvements and would be constructed as part of this project. ~~The planning for I-10 and the sports complex expansion has been well coordinated between ADOT and the Pima County Stadium District. The two major coordination elements were the vehicular underpass and a new intersection on Kino Parkway that will access the sports complex. Through this joint planning effort, the current Phase 1 and planned Phase 2 sports complex expansions are designed to accommodate I-10 widening, and the I-10 improvements would benefit and serve the expansion. ADOT has determined that Section 4(f) is not applicable under 23 CFR 774.11 because the interstate project and sports complex expansion have been jointly planned.~~

### **Environmental Impacts—Recommended Build Alternative**

#### *Park/Recreation-Related Section 4(f)—Julian Wash Greenway Trail*

*(Page 66 of the Draft EA)*

A *de minimis* impact finding would be appropriate because the following *de minimis* criteria are met:

1. The proposed improvements would result in the incorporation of approximately 44 feet of the more than 12-mile Julian Wash Greenway *Trail*/Chuck Huckelberry Loop Trail for a new local neighborhood road. This would result in a ~~direct impact~~ *minor use of the property without adverse effect*. Traffic on the road would be minimal and would be signed for motorists to yield to users of the greenway. The greenway would continue to function in its current state. No other attributes or features would be affected by the proposed construction. The project would not adversely affect the activities, features, or attributes qualifying the resource for protection under Section 4(f). This use of the Section 4(f) resource is disclosed in this EA. The EA ~~will be~~ *was* available for a ~~minimum 30~~ *45*-day review/comment period ~~and a public hearing will be held during the public comment period. (October 29 through December 12, 2019) and the~~ *de minimis use of the property was discussed during the project public hearing.*

2. A form that provides provided notification of the ADOT's *intent to make a de minimis* impact determination will be *was* sent to *the* Pima County Natural Resources Parks and Recreation Department *Project Management Office*, the owner of the property *the agreed official with jurisdiction of the trail*, for its concurrence. If Pima County concurs, it would *concur on June 3, 2020, thereby acknowledge that acknowledging that* the use of the *this portion of* Julian Wash Greenway *Trail* for the extension of access into a neighborhood would not adversely affect the activities, features, or attributes qualifying the resource for protection under Section 4(f).

In addition, the Julian Wash Greenway Trail would be temporarily closed during construction while culverts are extended and TI/surface road improvements on Country Club Road, Drexel Avenue, Kino Parkway, and Alvernon Way are in progress. Attributes of this resource include the path crossings under the roadways and trailhead ramps connecting the surface streets with the path. Surface streets can be used to bypass the construction zone. Drexel Bridge would be widened to accommodate the Julian Wash Greenway over the bridge. The duration of the closure would be approximately 4 months per crossing, which is shorter than the duration of the overall project. The remaining trail would be of the same condition or better following construction. ~~Potential temporary impacts to Julian Wash Greenway Trail during construction would qualify as a temporary occupancy, which is not considered a "use" of the resource because it satisfies all the conditions listed in 23 CFR 774.13.~~ The project would not affect the activities, features, or attributes of the trail/trailheads.

*(Page 67 of the Draft EA)*

Coordination with *the* Pima County Natural Resources Parks and Recreation Department *Project Management Office*, the official with jurisdiction, is *had been* ongoing regarding this temporary occupancy and *the de minimis impact determination of the potential new road across Julian Wash Greenway Trail*. Through the publication of the Draft EA and holding a public hearing, ADOT ~~will seek~~ *sought* concurrence that the use of this Section 4(f) resource would qualify as a temporary occupancy *de minimis impact. The potential use of this Section 4(f) resource and its de minimis impact was disclosed in the Draft EA published on October 29, 2019. A public hearing was held on November 20, 2019, during the 45-day public comment period, which extended from October 29 through December 12, 2019. The potential crossing of Julian Wash Greenway Trail was also presented at the public hearing, and an exhibit depicting its location was on display (Attachment 1: Appendix B, Section 4[f]). No comments were received relevant to this Section 4(f) resource impact (Attachment 1: Appendix C). On June 3, 2020, Nancy Cole, Director, Pima County Project Management Office, the official with jurisdiction, signed the notification form concurring with the de minimis impact for the potential new road across Julian Wash Greenway Trail (Attachment 4).*

#### *Kino Sports Complex*

*The planning for I-10 and the sports complex expansion has been well coordinated between ADOT and the Pima County Stadium District. The two major coordination elements were the vehicular underpass and a new intersection on Kino Parkway that will access the sports complex. Through this joint planning effort, the current Phase 1 and planned Phase 2 sports complex expansions are designed to accommodate I-10 widening, and the I-10 improvements would benefit and serve the expansion. ADOT has determined that Section 4(f) is not applicable under 23 CFR 774.11 because the interstate project and sports complex expansion have been jointly planned. On February 25, 2020, Nancy Cole, Director, Pima County Project Management Office, the official with jurisdiction, signed the notification form demonstrating that cooperation and joint planning had taken place (Attachment 4).*

*Historic Section 4(f)—Triple T Truck Stop**(Page 67 of the Draft EA)*

Located at 5383 East Benson Highway (I-10/Craycroft TI), the Triple T Truck Stop is one of a few remaining Mid-Century truck stops in Tucson. The building is NRHP-eligible under Criterion C. Approximately 3.7 acres of the 25-acre property would be required to provide access to commercial and residential properties north of the I-10/Craycroft Road TI. A loop connector road would be needed, requiring undeveloped land from the Triple T Truck Stop parcel. Refer to Appendix D for a detailed discussion of the access issues. Proposed ROW acquisition would extend to approximately 250 feet from the building. Though this acquisition would not impact the historic architecture, a portion of the parking lot would be incorporated into the transportation ROW for the project. In accordance with Section 4(f), ADOT notified SHPO of a *de minimis* impact finding. A Continuing Section 106 consultation letter was sent to SHPO on September 17, 2019, and SHPO concurred on October 22, 2019 (see Appendix E). This use of the Section 4(f) resource ~~is included~~ *was disclosed in this EA the Draft EA published on October 29, 2019. The use of this Section 4(f) resource was also presented at the public hearing (November 20, 2019), which was held during the 45-day public comment period (October 29 through December 12, 2019).* ~~The EA will be available for a minimum 30-day review/comment period, and a public hearing will be held during the public comment period.~~

***Environmental Commitments and/or Mitigation Measures****(Page 67 of Draft EA)*Arizona Department of Transportation Design Responsibility

- During final design, the Arizona Department of Transportation would coordinate with Pima County ~~Natural Resources Parks and Recreation Department~~ *Project Management Office* to minimize the temporary occupancy *impacts* of the Julian Wash Greenway Trail.

***Conclusion****(Page 67 of Draft EA)*

The construction of the proposed project, which would result in the incorporation of a minor amount of the Julian Wash Greenway Trail for the construction of Bentley Avenue or Treat Avenue, would not adversely affect the activities, features, or attributes that qualify the Julian Wash Greenway Trail for protection under Section 4(f) and meets the requirements of a use with a *de minimis* impact. As such, the proposed project would not result in a use of these resources, ~~and a temporary occupancy Section 4(f) exception applies to impacts under 23 CFR 774.13(d).~~ Finally, the proposed project would not adversely affect the activities, features, and attributes that qualify this future recreational feature for protection under Section 4(f) and meets the requirements of use with a *de minimis* impact. *The potential use of this Section 4(f) resource was disclosed in the Draft EA and presented in the public hearing. No comments were received relevant to these Section 4(f) resource impacts. Nancy Cole, Director, Pima County Project Management Office, the official with jurisdiction, signed the notification form on June 3, 2020, concurring with the de minimis impact for the potential new road across Julian Wash Greenway Trail (Attachment 4).*

The ROW acquisition from the Triple T Truck Stop would not impact the historic building architecture. The use of a minor amount of land from the property would not compromise the properties eligibility as historic and under Section 4(f) meets the requirements of a use with a *de minimis* impact. *ADOT notified*

*SHPO of a de minimis impact finding, and SHPO concurred. This use was disclosed to the public in the Draft EA and presented at the public hearing.*

*The design of the I-10 improvements to include a new intersection on Kino Parkway and construction of an underpass at I-10 to connect the existing sports complex to the expansion south has been jointly planned between ADOT and the Pima County Stadium District. Through this joint planning effort, the current Phase 1 and planned Phase 2 sports complex expansions will accommodate the I-10 widening.*

~~Comments obtained during the public comment period of the Draft EA will be compiled and provided to the officials with jurisdiction over the Section 4(f) resources for their consideration. No decisions will be made until the officials with jurisdiction have had the chance to review the public comments.~~

~~As design advances, ADOT would coordinate with Section 4(f) resource owners, as needed.~~

*(page 68 of the Draft EA)*

The proposed project would result in long-term, less-than-significant adverse impacts on the Julian Wash Greenway Trail and short-term, less-than-significant adverse impacts during construction due to temporary closures. ~~The temporary occupancy of the Julian Wash Greenway Trail at Treat Avenue during construction would be short-term and coordinated with Pima County. No long-term impact was identified in association with the No-Build Alternative.~~

## **G. Air Quality Analysis**

*(Page 71 of the Draft EA)*

### **Existing Conditions**

The project is in an area *formerly* designated as maintenance for CO (Tucson CO Maintenance Area) and *designated as* attainment or unclassified for all other criteria pollutants. *It has been subject to a CO maintenance plan since July 10, 2000. As of July 10, 2020, the Tucson CO Maintenance Area is in attainment for the 1-hour/8-hour CO NAAQS. Therefore, project-level conformity requirements no longer apply.* The Tucson region was previously a CO nonattainment area. ~~It is currently subject to a maintenance plan (effective July 10, 2000).~~ The project was evaluated *under NEPA* for potential impacts comparing the Recommended Build Alternative to the No-Build Alternative. A summary of the evaluation is found in *a Draft Air Quality Technical Report, Appendix F of the Draft EA. This draft report has been superseded by a Final Air Quality Technical Report included as Attachment 5 in this Final EA Errata.* The full analysis is found at the project website (see Air Quality Report Final at [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study)).

### **Transportation Conformity**

*(page 73 of the Draft EA)*

~~Documentation of interagency correspondence, including completed questionnaires that provide methodologies for the analyses,~~ *a completed questionnaire to qualitatively assess carbon monoxide (CO) concentrations for a NEPA comparison of alternatives and a completed questionnaire for MSATs that provides methodologies for the quantitative analyses* can be found at the project website (see Air Quality Report Final at [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study)).

## K. Drainage and Floodplain Considerations

### ***Environmental Impacts—Recommended Build Alternative***

*(Page 84 of the Draft EA)*

The Recommended Build Alternative would construct several retention/detention basins to collect local runoff. These basins would accept the added runoff from pavement surfaces. Generally, those basins would be within the existing TI ROW. In a few instances, new ROW would be acquired to provide basins outside the TI at I-10/Craycroft Road, Alvernon Way/Ajo Way, and Alvernon Way/Irvington Road. No proposed roadway improvements would be expected to result in an increased flood hazard to adjacent properties.

*Associated with the public hearing held for this project, additional drainage concerns were voiced by several members of the public for the area of Country Club Road just south of I-10. Landowners were concerned that with the construction of the project, drainage would back up on private property or otherwise result in flooding. ADOT will ensure that detailed drainage analyses are undertaken during each phase of final design to identify and address the potential for project construction to cause or contribute to flooding.*

## P. Secondary Impacts

*Title VI and Environmental Justice*

*(Page 95 of the Draft EA)*

With the presence of minority and low-income populations throughout much of the study area, the secondary impacts related to social and economic conditions described in the previous section could be experienced by minorities and persons of low income. The relocation of 25 businesses could result in job losses to individuals (it is assumed that some percentage of job losses will affect minorities or persons of low income), and a potential reduction in local employment opportunities for minority and low-income populations in the study area. With a reduction in local employment opportunities, some may need to find employment farther from home, increasing the time and expense of commuting to and from work. A moderate negative secondary economic impact could be expected to minority and low-income populations if acquired businesses do not relocate within the project vicinity. *As individual projects are programmed and advanced to Final Design, the potential negative secondary impacts associated with business relocations will be reviewed or analyzed in future EA Reevaluations, and mitigation beyond that stipulated in the Final EA will be considered. The PAG Regional Transportation Authority Main Street Assistance Program will be one avenue used to assist businesses impacted by the project. ADOT will continue to provide bilingual services for all public and business outreach through final design, acquisition, and construction.*

## Public Involvement and Coordination

The following updates were made to Part V, Public Involvement and Coordination, of the Draft EA.

## C. Draft EA Comment Period and Public Hearing

*(Pages 102 and 103 of the Draft EA)*

Agencies and members of the public ~~are~~ **were** invited to review and comment on the Draft EA and Initial DCR. The 45-calendar-day comment period ~~begins~~ **began** on October 29, 2019, ~~(the anticipated date of publication)~~ and ~~ends~~ **ended** on December 12, 2019. The Draft EA and Initial DCR ~~can be reviewed~~ **were**

*available for review* during business hours at the following repositories or on the study website at [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study):

Littletown Community Center  
6465 S. Craycroft Road  
Tucson, AZ 85756

Joel D. Valdez Main Library  
101 N. Stone Ave.  
Tucson, AZ 85701

Sam Lena-South Tucson Public Library  
1607 S. 6th Ave.  
Tucson, AZ 85713

A public hearing ~~will be~~ *was* held during the comment review period on Wednesday, November 20, 2019, from 5:30 p.m. to 7:30 p.m. at the Billy L. Lauffer Middle School, 5385 E. Littletown Road, Tucson, Arizona, to provide opportunity for review and comment. The study team ~~will be~~ *was* available to share information and answer questions during the open house portion of the meeting (5:30 p.m. to 7:30 p.m.). A presentation ~~will be~~ *was* made from 6:00 p.m. to 6:20 p.m. The formal public hearing ~~will begin~~ *began* at 6:30 p.m. The public hearing ~~provides~~ *provided* attendees the opportunity to submit comments verbally in front of a listening panel. Comments ~~can also be made at the public hearing in writing or by speaking to a~~ *were also accepted at the public hearing in writing or orally before a* court reporter one-on-one.

~~Comments can also be submitted any time during the comment period~~ *In addition, comments were accepted throughout the comment period* using any of the following methods:

- Mail to:  
ADOT Community Relations  
1221 S. Second Ave., Tucson, AZ 85713
- Telephone: 1-888-692-2678
- Email to: [i10SR210Study@hdrinc.com](mailto:i10SR210Study@hdrinc.com)
- Online via: [www.azdot.gov/i10SR210study](http://www.azdot.gov/i10SR210study)

All comments received by ADOT during the public comment period ~~will be~~ *have been* incorporated and considered in the Final EA and Final DCR and, if applicable, the Finding of No Significant Impact. ADOT responses to each comment ~~will be~~ *have been* included *in the Final EA Errata Sheet, Attachment 1: Appendix C. For more information contact:*

*ADOT Communications  
1655 W. Jackson St., Mail Drop 126F  
Phoenix, AZ 85007  
Telephone: (602) 712-8530  
Email: [i10SR210Study@hdrinc.com](mailto:i10SR210Study@hdrinc.com)*

~~Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national~~

origin, sex, age, or disability. Persons that require a reasonable accommodation based on language or disability should contact Jeremiah Moerke at 520-237-7605, or [JMoerke@azdot.gov](mailto:JMoerke@azdot.gov). Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

De acuerdo con el título VI de la Ley de Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades, el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) no discrimina por raza, color, nacionalidad, edad, género o discapacidad. Personas que requieren asistencia (dentro de lo razonable) ya sea por el idioma o por discapacidad deben ponerse en contacto con Jeremiah Moerke al [JMoerke@azdot.gov](mailto:JMoerke@azdot.gov) (520-237-7605). Las solicitudes deben hacerse lo más pronto posible para asegurar que el equipo encargado del proyecto tenga la oportunidad de hacer los arreglos necesarios.

#### ***D. Ongoing Activities***

*As ADOT continues the process of design, engineering, and construction of the I-10/SR 210 Selected Alternative, the public will have additional opportunities to provide input on the project. As the project moves forward, ADOT will maintain and update the project website, [www.azdot.gov/i10sr210study](http://www.azdot.gov/i10sr210study), to provide information about the project and to collect additional feedback from the public.*





**V.****Public Comments**

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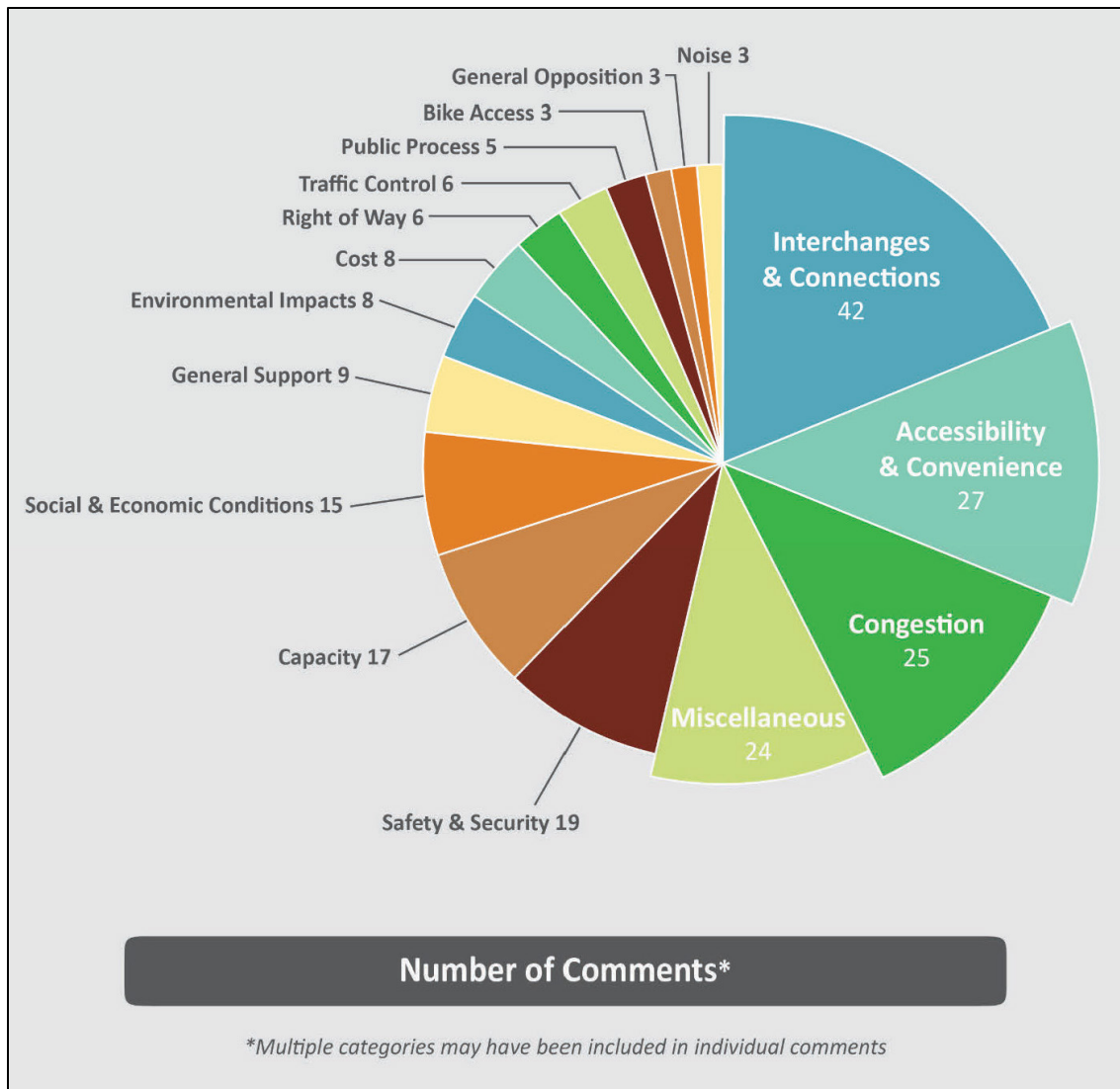
Public comments received on the Draft EA throughout the public comment period from October 29 through December 12, 2019, and at the public hearing on November 20, 2019, are included in the attached public involvement summary (Attachment 1: Appendix C). By the official close of the public comment period, 108 comments were received addressing a range of issues. Many similar comments were received from multiple commenters. Comments were classified into the following categories:

- Interchanges and connections
- Accessibility and convenience
- Congestion
- Miscellaneous
- Safety and security
- Capacity
- Social and economic conditions
- General support
- Environmental Impacts
- Cost
- Right-of-way
- Traffic control
- Public process
- Bike access
- General opposition
- Noise

Figure 1 shows the distribution of comments among the above-listed categories.

The comments received were focused primarily on interchanges and connections, accessibility and convenience, congestion, miscellaneous, and safety and security.

See Section 3, Public Comment Summary, in the attached I-10/SR 210 Public Involvement Summary in Attachment 1 of this document for additional information. Refer to Attachment 1: Appendix C for agency and public comments received and ADOT's responses to them.



**Figure 1. Comment categories**

## VI.

## References

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ADOT. 2015. *I-10, Junction I-19 to SR 83 and SR 210, Golf Links Road to Interstate 10 Feasibility Report Update*. February.

PAG. 2019. Pima Association of Governments Transportation Improvement Program, 2020–2024. [www.pagregion.com](http://www.pagregion.com). Accessed February 2020.

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