

FINAL PHASE INPUT OPPORTUNITY REPORT ADDENDUM

COMMENTS RECEIVED AT THE JUNE 7, 2016, PUBLIC HEARING ON THE DRAFT AMENDMENT TO THE 2035 MAG REGIONAL TRANSPORTATION PLAN, DRAFT FY 2017-2021 MAG TRANSPORTATION IMPROVEMENT PROGRAM, DRAFT FY 2016 TRANSIT PROGRAM OF PROJECTS, AND DRAFT APRIL 2016 MAG CONFORMITY ANALYSIS

Comments received at the June 7, 2016 Public Hearing:

Comments from Sharon Hettick, Sun City West Resident

Comment: Thank you for taking the time to listen to the public. I was here at a previous meeting and I do appreciate the fact that you have made some changes or recommendations in regard to the Northwest Valley. I'm still here because over 90,000 people who live in the Northwest Valley and Sun City West, Sun City, and Sun City Grand are still without any services, nor are we on your maps clear through 2035. The communities are completely left out of the process. We do have stakeholder meetings at all of them and we have talked with several members of the group that's over here in regard to what we need to do. But we still need circulators to go through our communities. One of the biggest problems is when I listen to Mr. (Valley Metro Representative Jorge) Luna talk about the average age of the rider on the bus as 35, I'm thinking of the number of senior communities that you have in the Northwest Valley who are not even counted because we have no services there. And we now have over 200,000 people living in the Surprise, Sun City West, Sun City Grand and Sun Cities areas that have absolutely no services. So I would appreciate it going forward, looking at the monies—we do pay our taxes, we do have Prop 400 monies that we were promised with services available that are not there yet. So I would ask that you look at that going forward for the future.

Response:

Valley Metro has been working with local partners to understand the extent of transit service gaps throughout the region, including in Sun City, Sun City West, Sun City Grand, and Surprise. Recently, Valley Metro has been working with the City of Surprise to analyze and better understand the cost of extending routes further into the Northwest Valley; data from MAG's Northwest Valley Local Transit System Study and feedback from city staff has helped to populate the Short Range Transit Program with a few local bus route extension options, routes 170 and 138. Additional efforts will need to be coordinated with Maricopa County regarding service extensions through unincorporated areas. While the Great Recession resulted in a deferral of many Prop 400 projects across the region, Valley Metro and MAG are committed to working collaboratively with local transit staff to enhance regional mobility, identifying improvements that could be recommended for funding in the future.

Comments from Kathryn Chandler, Surprise Resident

Comment: I want to thank you, for the consideration of letting us speak, but also for providing the transportation that we do have in this area. We do have a lot of good transportation. I have two daughters that benefit from the transportation in Tempe and downtown Phoenix. But none of us can benefit from that same transportation if we're in Surprise. So the Northwest Valley has very little

available, and you already know that the Dial-a-Ride is wonderful and we are glad to have that, but there is no fixed route in our area. So what I'd like to say is, I see in the Plan online that the 170 is going to come out to Surprise on Bell Rd., that the 138 is going to come out to Surprise from Thunderbird and Grand, and then Waddell, and so I'm thrilled to see that. The 83 is coming north on 83rd Avenue. And then I see a circulator going out in north Peoria. Those are wonderful, we are getting much closer. But none of those goes into Sun City West or around Surprise other than coming through to City Hall. But it's a really good first step and I wanted to tell you that we have some groups in Sun City and in Sun City West that are meeting that are actually talking about what the community might be able to do as far as putting together groups that have their own vehicles. Grandview Terrace has a nice bus. There are some other agencies that have nice vans that might start community circulators and work together as a group to start forming something. But we're really hoping that if this takes off, Valley Metro steps in or MAG steps in with a plan, or Valley Metro steps in picking up on those things in the years to come. So we are really moving to do our part as a community also.

Response: As you noted, the City of Surprise has provided additional dollars for Dial-a-Ride services. Valley Metro has been working with local partners to understand the extent of transit service gaps throughout the region, including in Sun City, Sun City West, and Surprise. Recently, Valley Metro has been working with the City of Surprise to analyze and better understand the cost of extending routes further into the Northwest Valley; as you already noted, data from MAG's Northwest Valley Local Transit System Study and feedback from city staff has helped to populate the Short Range Transit Program with a few local bus route extension options, routes 170 and 138. Additional efforts will need to be coordinated with Maricopa County regarding service extensions through unincorporated areas.

Comments from Amina Donna Kruck, Vice President of Advocacy – Ability 360

Comment: We appreciated that there was a little adjustment at the last meeting of the transportation committee about the transportation improvement to decide to still include some ADA bus stop improvement funds. We think that's really important. We understand the concern about the amount of cost that it takes to do small projects. It let me know that we need to get with our cities to make sure they are spending their money, right? And we're very excited about the light rail stop that's included in this plan at 50th Street and Washington. So I want to thank you for your efforts and hope that this moves along quickly, we can't wait.

Response: Action taken at the May 17, 2016, Transit Committee recommended inclusion of ADA bus stop improvement funding in the amount of \$1 million in 2016 and \$1.5 million in 2017, with \$6 million unassigned and to be programmed for future projects in fiscal years 2018 through 2021 with consideration for additional ADA funding. MAG staff will work with the community and member agencies to ensure that funds are utilized efficiently.

The light rail transit station at 50th and Washington is scheduled to open in 2019.

Comments from Dianne Barker, Phoenix Resident

Comment: I am a friend of transit. I believe in multimodal, many modes of getting around. I'm asking this body and all of the bodies I go in front of to be part of the voluntary effort. To be part of the multimodal, to cut down on congestion and pollution, not only in Maricopa County but in Pinal. In

regard to the air quality presentation, I'm very aware of our longstanding carbon monoxide maintenance program. I read that Bolin, the Governor, back in 1976, found out that Tucson and Phoenix, the greater Phoenix area, was having a carbon monoxide problem. The cars, through technology, have helped that effort. But now what we have is increasing particulates, it's been going on since the 90's. And we have the ozone in the last couple of days. I will tell you I was over at Burton Barr (library) the other day and we had to leave the library some of us because we were coughing. They are building so many things it could be somebody caught the gas but it was not that much better outside. It was around rush hour around Deck Park.

Response: Over time, there have been significant improvements in air quality in the MAG region. On April 4, 2016, the Environmental Protection Agency approved the MAG 2013 Carbon Monoxide Maintenance Plan. There have been no violations of the 1-hour carbon monoxide standard since 1984 and no violations of the 8-hour carbon monoxide standard since 1996. Effective July 10, 2014, EPA determined that the region has attained the PM-10 standard based upon 2010-2012 monitor data. In 2015, there were no exceedances of the PM-10 standard and no PM-10 exceptional events. For ozone, the region has met the 1-hour ozone standard and there were no violations at any monitor after 1996. The region has also met the 1997 8-hour ozone standard and there have been no violations of that standard since 2004. The region currently does not meet the new 2015 ozone standard. In addition, the new federal Tier 3 tailpipe standards and cleaner fuels will be implemented in 2017, which will also reduce ozone based upon EPA data.

Comment: We need to see where we have bottlenecks. We're running not only light rail, but we've got new buses. They're very nice and air conditioned. I suggest that you try them. It's good for getting us quicker around the Valley if we would put in bus rapid transit. So I'm for some innovative ways to move we people in a quicker and more efficient manner.

Response: Bus rapid transit is a service that operates at higher speeds by taking advantage of limited stops and other time-saving enhancements, including signal priority systems, queue jumpers, and/or exclusive or semi-exclusive travel lanes. Implementation of bus rapid transit has been proposed under the City of Phoenix's Transportation 2050, a voter-approved 0.4 cent sales tax to fund transportation projects across the city. While the City of Phoenix begins implementation of improved transit service, Valley Metro and MAG will continue evaluating opportunities to enhance regional service and connectivity.

Comment: I think on your chart you have all the different light rail you're going for, but I went to Valley Metro and I understand Leslie Rogers from the ninth region, I believe I have this right, says only the Tempe streetcar is in the chute for that. So what we need to do here at MAG is see if we are properly aligned or are we going to have to go with decreasing Prop 400 regional monies for this.

Response: Tempe Street Car is currently in the Federal Transit Administration project development phase and has been included President Obama's budget for Fiscal Year 2017 for \$75 million. The Tempe Streetcar project capital costs are estimated at \$177 million and will be funded using regional Proposition 400 funds, local funds, and federal grant dollars.

Comment: And then the City of Phoenix, the Phoenix commission, they were surprised they only had two bidders on the project management. Well the project management for light rail, they bring in all of

these engineers directly that don't have to bid. The one that won had a subcontractor that ended up with \$35 million of no-compete over light rail. And they go for environmental and alternative analysis and the state said in 2012 Deb Davenport that the alternatives analysis wasn't going for enough alternatives. We've always got the same thing. At-grade rail. So if we don't watch out where we're going we might end up there.

Response: Solicitations for professional consulting services are facilitated according to the procurement processes established by each soliciting agency and contracting is subsequently approved by the agency's governing body.

Comments from Ruth Morgan, Phoenix Resident

Comment: Rapid transit is needed in South Phoenix.

Response: With the passage of Proposition 104 (Transportation 2050), Phoenix voters approved a .4 cent sales tax to fund a 35-year citywide transportation plan to expand transit service and address street improvements. As part of this initiative, improved frequency and service operation for local bus service was a key goal. While the City of Phoenix begins implementation of improved transit service, the city will continue to explore opportunities to enhance regional service and connectivity.

E-Mail Comment fromCarolynn Jeter, Chief Operating Officer, A-Making Changes, LLC -

Comment: I am seeking assistance for someone to help me to obtain (2) 2016 15 passenger vans so that I can transport Seniors to get there daily basic needs meet, attend doctor appointments, etc. I currently have a program called Seniors Matters Program.

Response: Ms. Jeter was contacted by MAG Human Services Transportation Planner DeDe Gaisthea and was provided application information for Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program. Additionally, Ms. Jeter was given information about the Human Services Provider inventory where she could review available resources.

E-Mail Comment from Michele Stokes, ADA Compliance Specialist, City of Tempe/Office of Strategic Management and Diversity

Comment: I was looking at the awesome map (on MAG's interactive map viewer on demographics) with all the layers, but could not find anything related to disability. Is that available?

Response: (Note: MAG also responded via telephone to clarify the information sought and provided information via email - See Correspondence Section of this Report):

There are several resources available regarding disability populations in Tempe. On the MAG website, this information is available by census tract at:

<https://azmag.maps.arcgis.com/apps/webappviewer/index.html?id=a88cb923d5c6400f8450817e8333eb51>

If the user types "Tempe" in the search box, it should zoom in to the Tempe section of the map. The user can hover over each tract to see the disability information pop up. In addition, the MAG

Information Services staff sent a PDF report via email to Ms. Stokes containing disability data for the City of Tempe from the American Community Survey (census) website. The data contained in the report can be found in the table on the Census website:

http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/S1810/1600000US0473000.

E-Mail Comment from Walt Gray, Coordinator, West Side Town Hall Program

Comment: I am out of state. Want to urge MAG & ADOT to be ready to move if the court rules against the South Mountain Freeway. The West Side Town Hall Program opposes the South Mountain Freeway because it would provide the Chandler area with access to West Phoenix jobs at a time when insufficient attention is being paid to workforce development programs and funding for West Phoenix. We also support PARC because the South Mountain Freeway will adversely affect the Gila River Nation through traffic, noise and pollution for the indefinite future. We think MAG and ADOT should not appeal an adverse court decision because this issue has been widely explored and debated for years. A 30-year plan is out of date by definition. We think MAG and ADOT should move quickly on a parkway from I-10 to the Gila River Nation border. This will provide access to Laveen and the Gila River Nation and keep the economic development opportunities in the Warehouse district and along the parkway. We also think MAG and ADOT should move quickly on SR 30 from the Laveen parkway to the Buckeye-Gila Bend highway and that the Buckeye-Gila Bend highway should be upgraded to freeway standards. This will improve the flow of goods and services to and from the Laveen parkway economic development area. Additionally, we believe underdeveloped sections of Baseline Road should be upgraded from 91st Ave. east to I-10 and that Pecos Road should be made a parkway from I-10 west to the Laveen-Gila River parkway. We also believe MAG and ADOT should accelerate construction of the West Valley bypass for I-11. This would be a better bypass around the Phoenix area than the South Mountain Freeway because it will have more capacity and tie in with I-10 south of the Gila River Nation. We also support accelerated development of high speed rail from Tucson to Phoenix east of I-10.

Response: The Loop 202 (South Mountain Freeway) has been included in the region's adopted transportation planning documents since 1985 and remains in the current Regional Transportation Plan (RTP) as it is a vital component in providing regional mobility. Maricopa County voters twice approved building the South Mountain Freeway, most recently in 2004 through Proposition 400, which authorized the comprehensive, multimodal Regional Transportation Plan.

ADOT and the Federal Highway Administration (FHWA) completed a rigorous 13-year analysis to ensure the freeway complies with the National Environmental Policy Act of 1969 (NEPA). This analysis included developing a comprehensive Environmental Impact Statement (EIS) that complies with federal law and follows best practices for transportation projects. In March 2015, FHWA issued a Record of Decision, providing ADOT with formal federal approval to proceed with design, land acquisition, and construction of the South Mountain Freeway.

MAG projections show population, housing, and employment will increase by approximately 50 percent between 2010 and 2035, increasing travel demand. Almost 50 percent of projected increases in the entire MAG region are expected to occur in the area that the South Mountain Freeway will serve.

Traffic volumes for the freeway are expected to be in the range of 147,000 to 161,000 vehicles per day by 2035, which is comparable to current use on the Loop 101 and Loop 202. The freeway will also result in 15-million hours of travel time savings annually when compared to the "no-build" alternative.

Congestion relief resulting from the new freeway will lead to localized air quality emissions reductions on area freeways, arterial streets and at interchanges, benefitting users of area highways and those living near congested roads. Without the freeway, the Maricopa County Region would suffer even greater congestion and travel delays, which would increase the emission of air pollutants.

The 22-mile freeway, expected to open in late 2019, will provide a long-planned direct link between the East Valley and West Valley, and will complete the Loop 202 and Loop 101 systems. The current and anticipated congestion on freeways and roads, especially Interstate 10 through downtown Phoenix, will significantly improve the way in which people and goods get around the Phoenix-Metro area.

Correspondence comment from Timothy Franquist, Director, Air Quality Division, Arizona Department of Environmental Quality

Comment: The Arizona Department of Environmental Quality understands that MAG has been working diligently to implement all planning assumptions, transportation control measures, and conformity budgets.

Response: Thank you for acknowledging the work that MAG has completed for the conformity analysis covering the Maricopa Nonattainment and Maintenance Areas and the Pinal County PM-10 and PM-2.5 Nonattainment Areas.

Comment: ADEQ acknowledges the discrepancy between the PM-10 interim analysis and the West Pinal County PM-10 nonattainment area motor vehicle emissions budget (submitted December 22, 2015) is due to the inclusion of all unpaved roads within the region and not simply those categories included within the West Pinal PM-10 motor vehicle emissions budget. ADEQ concurs with this finding of conformity after verifying MAG's methods.

Response: Thank you for agreeing with the regional emissions analysis that supports a new finding of conformity.

Comment: For the Pinal County interim budget analyses MAG appears to be using different methods for calculating interim PM-2.5 emissions than those used for interim PM-10 emissions. The Pinal PM-10 and Pinal PM-2.5 nonattainment areas are experiencing similar rates of VMT growth along unpaved roads, which impacts re-entrained road dust emissions greatly but is only reflected in the PM-10 interim budget tests. 40 CFR Section 93.102(b)(3) states: "The provisions of this subpart apply to PM-2.5 nonattainment and maintenance areas with respect to PM-2.5 from re-entrained road dust if the EPA Regional Administrator or the director of the State air agency has made a finding that re-entrained road dust emissions within the area are a significant contributor to the PM-2.5 nonattainment problem and has so notified the MPO and DOT, or if the applicable implementation plan (or implementation plan submission) includes re-entrained road dust in the approved (or adequate) budget as part of the reasonable further progress, attainment or maintenance strategy. Re-entrained road dust emissions are produced by travel on paved and unpaved roads (including emissions from anti-skid and deicing

materials)." Draft emission inventory and motor vehicle emission budget (MVEB) development by ADEQ for the Pinal County PM-2.5 nonattainment area indicates re-entrained road dust is a significant contributor to the MVEB at 29.7% of the primary PM-2.5 inventory (table below). Any future budget tests must use re-entrained road dust emissions. ADEQ will consult with SCMPO, MAG, and other appropriate entities as this MVEB continues development in order to discuss the methodology utilized and the implications to the budget test.

Draft 2008 West Pinal Primary PM-2.5 Emissions Inventory		
Source Category	PM-2.5 (tons)	Percentage
Point Sources	47.0	1.0%
Area Sources	1,063.2	21.8%
Mobile Sources	70.8	1.5%
Windblown	2,246.9	46.1%
Re-entrained Road Dust	1,448.1	29.7%
Total	4,876.1	

Response: The transportation conformity provisions for including re-entrained road dust in conformity analyses apply if the EPA Regional Administrator or the director of the State air agency has made a finding that re-entrained road dust emissions within the PM-2.5 nonattainment area are a significant contributor or if the applicable air quality plan or plan submission includes re-entrained road dust in the approved or adequate budget. To date, these actions have not occurred. Please keep us advised if EPA takes this action. Also, in your comments you indicated that you would be consulting with the Sun Corridor MPO, MAG, and other appropriate entities. We will look forward to those discussions. It will be very important to review your methodologies used to develop the emissions budget for transportation conformity.

ATTACHMENT

Correspondence received following Management Committee Mailout

Leila Gamiz

From: Dean Giles
Sent: Wednesday, June 01, 2016 9:16 AM
To: DeDe Gaisthea
Cc: Lindy Bauer; Leila Gamiz
Subject: FW: Seeking Assistance to obtain Van for Senior Program

From:Carolynn Jeter [mailto:carolynnjeter@a-makingchanges.org]
Sent: Tuesday, May 31, 2016 12:15 PM
To: Dean Giles
Cc: Dr. Allen Jeter
Subject: Seeking Assistance to obtain Van for Senior Program

Greetings Mrs. Giles,

My Name is Carolynn Jeter, I am seeking assistance for someone to help me to obtain (2) 2016 15 passenger vans so that I can transport Seniors to get there daily basic needs meet, attend doctor appointments, etc. I currently have a program called Seniors Matters Program. And I humbly do apologize if you are not the person who I need to contact. But, your name was sticking out to me with such illumination. So, in my heart I said she can help me. Please if you could contact me at 480-524-2823 so, I can discuss further in detail my passion and desire to help the seniors of our South Mountain community.

May God Bless You

MRS. CAROLYNN W. JETER

A-Making Changes, LLC

Chief Operation Officer

Email: carolynnjeter@a-makingchanges.org

Office Phone: 480-521-4815

Direct Phone: 480-524-2823

Psalm 37:25 I was young and now I am old, yet I have never seen the righteous forsaken or their children begging bread.

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Leila Gamiz

From: Dean Giles
Sent: Monday, June 06, 2016 8:47 AM
To: Leila Gamiz
Cc: Lindy Bauer; Kelly Taft; Eric Anderson
Subject: FW: Transportation Plan

From: Walt Gray [mailto:walt1gray.1914@gmail.com]

Sent: Saturday, June 04, 2016 7:17 PM

To: Dean Giles

Cc: AndreaandKenMcCoy; Dan Carroll; ihdockmaster@yahoo.com; s.chapman88@hotmail.com; Tiffani Getz; Basilio Arriola; Kamal Shiha; Petra Ortega; Sam Sada; Simon Isaac; Tom Tavison; Evelyn Shapiro; hgarewal@trinandassociates.com; Rosa Pastrana; Sylvia Whitman; Pat Lawlis; Tim Lank; Rudy Pena; engage@az.gov

Subject: Transportation Plan

I am out of state

Want to urge MAG & ADOT to be ready to move if the court rules against the South Mountain Freeway. The West Side Town Hall Program opposes the South Mountain Freeway because it would provide the Chandler area with access to West Phoenix jobs at a time when insufficient attention is being paid to workforce development programs and funding for West Phoenix. We also support PARC because the South Mountain Freeway will adversely affect the Gila River Nation through traffic, noise and pollution for the indefinite future. We think MAG and ADOT should not appeal an adverse court decision because this issue has been widely explored and debated for years. A 30-year plan is out of date by definition. We think MAG and ADOT should move quickly on a parkway from I-10 to the Gila River Nation border. This will provide access to Laveen and the Gila River Nation and keep the economic development opportunities in the Warehouse district and along the parkway. We also think MAG and ADOT should move quickly on SR 30 from the Laveen parkway to the Buckeye-Gila Bend highway and that the Buckeye-Gila Bend highway should be upgraded to freeway standards. This will improve the flow of goods and services to and from the Laveen parkway economic development area. Additionally, we believe underdeveloped sections of Baseline Road should be upgraded from 91st Ave. east to I-10 and that Pecos Road should be made a parkway from I-10 west to the Laveen-Gila River parkway. We also believe MAG and ADOT should accelerate construction of the West Valley bypass for I-11. This would be a better bypass around the Phoenix area than the South Mountain Freeway because it will have more capacity and tie in with I-10 south of the Gila River Nation. We also support accelerated development of high speed rail from Tucson to Phoenix east of I-10.

Thanks & Best Wishes

Walt Gray

Coordinator, West Side Town Hall Program

cc: Gov. Doug Ducey, West Side Town Hall Advisory Committee, Merchants for a Better Maryvale, West Side Town Hall Steering Committee and PARC

From: [Kelly Taft](#)
To: Michele_Stokes@tempe.gov
Cc: [Leila Gamiz](#); [Jami Dennis](#)
Subject: FW: Public hearing info request
Date: Friday, June 03, 2016 3:27:49 PM
Attachments: [ACS 14 5YR S1810-Tempe.pdf](#)

Dear Ms. Stokes:

Thank you for your interest in the public comment process for the MAG FY 2016 Final Phase Input Opportunity. Please feel free to respond to this email with any formal input you would like to have us include in the report. More information about the upcoming public hearing June 7, 2016, is available on the MAG website at <http://www.azmag.gov/Events/Event.asp?CMSID=10521>. The hearing is scheduled to begin at 5:00 p.m. at the MAG Offices, 302 N. 1st Avenue, Second Floor, Saguaro Room, Phoenix. The building is easily accessible by public transit. The hearing represents the final opportunity for comment, so please note that we are more than happy to take written or telephone comments any time prior to the hearing so that we have additional time to respond.

Per our telephone conversation earlier today, I was able to locate several resources for you regarding disability populations in Tempe. On the MAG website, this information is available by census tract at:

<https://azmag.maps.arcgis.com/apps/webappviewer/index.html?id=a88cb923d5c6400f8450817e8333eb51>

If you type "Tempe" in the search box, it should zoom in to the Tempe section of the map and if you hover over each tract you will see the disability information pop up. In addition, our information services staff pulled a report on disability data for the City of Tempe from the American Community Survey (census) website that is attached as a PDF. This link should also take you to the table on the Census website:

http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/S1810/1600000US0473000

We hope you find this information helpful. If you have additional questions or comments, please don't hesitate to contact me.

Kelly Taft, APR
Communications Manager
Maricopa Association of Governments
(602) 452-5020

Don't Trash Arizona!

From: Stokes, Michele [mailto:Michele_Stokes@tempe.gov]
Sent: Friday, June 03, 2016 10:20 AM
To: Dean Giles
Subject: Map - is there any disability information available?

I was looking at the awesome map with all the layers, but could not find anything related to disability.

Is that available?

Looking forward!

Michele Stokes,

ADA Compliance Specialist

City of Tempe/Office of Strategic Management and Diversity

31 East Fifth Street, 2nd Floor, Tempe, AZ 85281

[Tempe City Hall Map](#)

480-350-2704 Direct Line

480-350-2907 FAX

Relay Service Users: 711

Comment on TEMPE'S ADA TRANSITION PLAN Throught May 25th!

<http://www.tempe.gov/city-hall/diversity/ada-accessibility/ada-transition-plan>



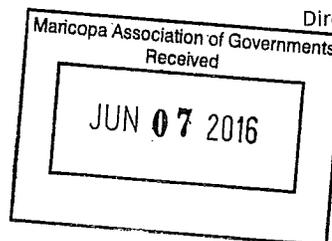
Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

June 7, 2016



Dennis Smith
Maricopa Association of Governments
302 North 1st Avenue, Suite 300
Phoenix, Arizona 85003

Re: Draft April 2016 Conformity Analysis

Dear Mr. Smith,

The Arizona Department of Environmental Quality (ADEQ) is hereby submitting comments on the Draft April 2016 Conformity Analysis for the Draft FY 2017-2021 Transportation Improvement Plan and the Draft FY 2035 Regional Transportation Plan the Maricopa Association of Governments (MAG) submitted in accordance with 40 CFR 93.105 for public comment ending on June 7th. ADEQ understands that MAG has been working diligently to implement all planning assumptions, transportation control measures, and conformity budgets in the Maricopa Carbon Monoxide (CO), Maricopa 8-Hour Ozone, Maricopa Course Particulate Matter (PM₁₀), Pinal Course Particulate Matter, and Pinal Fine Particulate Matter (PM_{2.5}) nonattainment areas (NAAs). After reviewing these documents and the State Implementation Plans associated with the NAAs ADEQ has determined that:

1. ADEQ acknowledges the discrepancy between the PM₁₀ interim analysis and the West Pinal County PM₁₀ nonattainment area motor vehicle emissions budget (submitted December 22, 2015) is due to the inclusion of all unpaved roads within the region and not simply those categories included within the West Pinal PM₁₀ motor vehicle emissions budget. ADEQ concurs with this finding of conformity after verifying MAG's methods.
2. For the Pinal County interim budget analyses MAG appears to be using different methods for calculating interim PM_{2.5} emissions than those used for interim PM₁₀ emissions. The Pinal PM₁₀ and Pinal PM_{2.5} NAAs are experiencing similar rates of VMT growth along unpaved roads which impacts re-entrained road dust emissions greatly but is only reflected in the PM₁₀ interim budget tests. 40 CFR § 93.102(b)(3) states:

“The provisions of this subpart apply to PM_{2.5} nonattainment and maintenance areas with respect to PM_{2.5} from re-entrained road dust if the EPA Regional Administrator or the director of the State air agency has made a finding that re-entrained road dust emissions within the area are a significant contributor to the PM_{2.5} nonattainment problem and has so notified the MPO and DOT, or if the applicable implementation plan (or implementation plan submission) includes re-entrained road dust in the approved (or adequate) budget as part of the reasonable further progress, attainment or maintenance strategy. Re-entrained road dust emissions are produced by travel on paved and unpaved roads (including emissions from anti-skid and deicing materials).”

Draft emission inventory and motor vehicle emission budget (MVEB) development by ADEQ for the Pinal County PM_{2.5} nonattainment area indicates re-entrained road dust is a significant contributor to the MVEB at 29.7% of the primary PM_{2.5} inventory (table below). Any future budget tests must use re-entrained road dust emissions. ADEQ will consult with SCMPO, MAG, and other appropriate entities as this MVEB continues development in order to discuss the methodology utilized and the implications to the budget test.

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Mobile Sources	70.8	1.5%
Windblown	2,246.9	46.1%
Reentrained Road Dust	1,448.1	29.7%
Total	4,876.1	

Sincerely,



Timothy Franquist, Director
Air Quality Division