To: Schuller, Jennifer[Schuller.Jennifer@epa.gov]
From: Anderson, Carol
Sent: Thur 11/3/2016 2:43:31 PM
Subject: FW: Followup Questions from last week's IAC meeting

On the bottom are Tim's questions to Jeff Hauk at FHWA that I mentioned yesterday. Here is Jeff's response.

Carol M. Anderson

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From: Houk, Jeff (FHWA) [mailto:Jeff.Houk@dot.gov]
Sent: Wednesday, November 02, 2016 2:59 PM
To: Russ, Timothy <Russ.Tim@epa.gov>
Cc: Dresser, Chris <Dresser.Chris@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>; Horn, Chris (FHWA) <Chris.Horn@dot.gov>; Henderson - CDOT, Vanessa (vanessa.henderson@state.co.us) <vanessa.henderson@state.co.us>
Subject: Followup Questions from last week's IAC meeting

Referred to FHWA

Referred to FHWA

Jeff

From: Russ, Timothy [mailto:Russ.Tim@epa.gov]
Sent: Thursday, October 27, 2016 9:33 AM
To: Houk, Jeff (FHWA)
Cc: Dresser, Chris; Anderson, Carol
Subject: Conclusion of the PM10 conformity consultation: FHWA/EPA-R9 South Mountain Freeway project + Additional Questions

Hi Jeff,

Thanks for forwarding the below email from Region 9. We had a couple of other questions regarding the information that FHWA presented at Tuesday's (10/25/16) Cooperating Agencies meeting and would appreciate additional information that we will want to share within Region 8 and OTAQ.

1.) The attached email from Region 9, regarding the PM_{10} conformity consultation for the South Mountain Freeway project near Phoenix, AZ, addressed comments and FHWA responses on the Draft EIS for the project. Did Region 9 provide additional comments and/or conformity consultation on the Final EIS?

EPA Region 9 provided one comment on the FEIS related to conformity (copied below). The FEIS had identified the worst-case traffic location as being analyzed for conformity, with two additional locations being analyzed for NEPA purposes; Region 9 pointed out that one of the NEPA locations actually had the highest concentration.

U.S. EPA DETAILED COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE SOUTH MOUNTAIN FREEWAY PROJECT, MARICOPA COUNTY, ARIZONA, DECEMBER 22, 2014

Air Quality

Transportation Conformity

Since completing our review of the Draft EIS for the South Mountain Freeway project in July 2013, EPA has been working closely with FHWA to address project-level Transportation Conformity requirements, including the need to analyze the "worst-case intersection" with the highest total PM10 concentrations. Both Chapter 4 of the Final EIS and the Air Quality Technical report describe the worst-case intersection, where the new roadway would connect to I-10 west of Phoenix, as being analyzed for the purposes of conformity requirements, while both the 40th Street and Broadway Road intersections are characterized as being analyzed for NEPA purposes only. However, the results of the Transportation Conformity analysis demonstrate that the 40th Street Interchange is the location with the highest total PM10 concentrations. EPA's PM10 hot-spot guidance states, "it may be appropriate in some cases to focus… on the locations of highest air quality concentrations," and thus it is important that the 40th Street interchange also be characterized as being analyzed for conformity purposes. EPA recommends that this be clarified in the Record of Decision (ROD).

Ex. 5 - Deliberative Process

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Referred to FHWA

Referred to FHWA

3.) We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher

precentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on 1-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

We responded to this question in out letter of 6/22/16, which CDOT and FHWA received a copy, and noted:

"B.) Question #3 regarding truck emissions:

The EPA's transportation conformity regulation requires that estimated pollutant concentrations must be based on the total emission burden which may result from the project and future background concentrations (40 CFR 93.123©(I)). The EPA's guidance for modeling emissions from highways is that local traffic data should be used to characterize each link sufficiently. As we noted above, an updated hot-spot analysis is being developed for 2040 by CDOT/FHWA, and the EPA will be reviewing the percentage of trucks used for the analysis."

Ex. 5 - Deliberative Process

Referred to FHWA

Thanks!

Tim

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From: Houk, Jeff (FHWA) [mailto:Jeff.Houk@dot.gov]
Sent: Tuesday, October 25, 2016 2:39 PM
To: Russ, Timothy <Russ.Tim@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>
Subject: FW: Conclusion of the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project

This is the "close-out" email we got from EPA Region 9 regarding the South Mountain Freeway project that I mentioned this morning.

From: meek, clifton [mailto:meek.clifton@epa.gov]
Sent: Thursday, August 21, 2014 5:50 PM
To: Yedlin, Rebecca (FHWA)
Cc: Hansen, Alan (FHWA); Houk, Jeff (FHWA); Dunning, Connell
Subject: Conclusion of the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project

Hi Rebecca-

I spoke with Alan Hansen this morning regarding the additional air quality comments EPA had sent on both 8/19 and 8/6, and he confirmed that all of the comments are being addressed by

FHWA, and the Air Quality Technical Report revised accordingly. With that information, this concludes the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project. We'd like to thank FHWA for working so closely with EPA to address our concerns, and we look forward to reviewing and providing comments on the Final EIS when it is circulated for review.

Please see the attached spreadsheet for a summary of the consultation (comments and responses) that has taken place between EPA and FHWA since we received the Air Quality Technical Report on 6/2/2014. If you have any questions or notice any revisions that should be made to the summary, please let me know.

Thanks,

Clifton

Clifton Meek, Life Scientist

U.S. EPA, Region 9

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