

U.S. EPA Gives Loop 202 South Mountain Freeway a Failing Grade

For Immediate Release

Phoenix, AZ, August 6, 2013

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After 30 years of planning, or at least selling the idea of the freeway to the public, ADOT issued its approximately \$22 million Draft Environmental Impact Statement approving the Pecos Road alignment and the plan to blast through South Mountain Park. The problem is that while the proposed alignment might have made some sense 30 years ago, it makes no sense now.

Transportation experts have confirmed that the freeway would not alleviate traffic on I-10 or the 60.

Now, even the EPA has given ADOT's plan a failing grade. In 16 pages of comments to ADOT, EPA declared the plan vastly incomplete and proceeded to direct ADOT in areas that need to be completely redone, including many aspects of air pollution modeling.

EPA also offered to show ADOT how to use the correct models and analysis, provided a tutorial, and indicated it would closely review whatever ADOT does to make certain it gets it right. EPA also warns that if the modeling shows air pollution problems, the freeway would not be approved for construction.

Transportation conformity requirements of the Clean Air Act provide that a project may not cause or contribute to any new localized violation of a national ambient air quality standard, increase the frequency or severity of any existing violations, or delay timely attainment of the standard. Since the area is currently designated as nonattainment for some forms of pollution, it is unlikely the freeway, which is actually a truck bypass, can ever conform to air quality requirements.

ADOT apparently knows that it can never meet these air quality requirements. Hence, it has spent most of its time and effort on swaying public opinion by trying to convince the public that the freeway would alleviate traffic congestion. Now that the experts have examined the plan, it is clear that it would not alleviate congestion and it would make air pollution worse instead of better.

EPA's comments are available on-line at:

<http://www.epa.gov/region09/nepa/letters/az/south-mountain-freeway-deis.pdf>