



October 1, 2007

The Honorable Pima County Board of Supervisors
130 W. Congress – 11th Floor
Tucson, AZ 85701

**RE: KINNEY ROAD IMPROVEMENT PROJECT
Environmental Assessment and Mitigation Report (EAMR)**

Dear Board of Supervisors:

The Kinney Road Citizens Advisory Committee (CAC) would like to thank Pima County staff and its consultant team for the exemplary effort which has been put forth on this roadway improvement project. Both the technical data presented, and the extensive public-participation process employed, were highly professional and yielded information of great value to the respective CAC members. Not only did it enlighten us as individuals, but afforded us the opportunity to engage our various constituencies in a highly informed and effective manner.

The Committee generally finds the *Draft Environmental Assessment and Mitigation Report (EAMR)* to be a thorough and acceptable document and we encourage the Board of Supervisors to adopt same and to authorize the construction of this important project. That being the case, we would nonetheless cite the following issues which we believe are material and which merit the Board of Supervisors' further consideration:

1. Noise impacts are of particular concern of the Committee. As such, we would respectfully request that the Board require a post-construction noise study of the area to empirically determine the new noise levels within the project vicinity following completion of the roadway construction. This study would be an "existing conditions" study only (i.e., would not include a long-term projection of future noise levels), but would be reflective of peak-season conditions and peak-season traffic volumes in the area. Upon completion, the compiled study would be distributed, by Pima County DOT, to the members of the CAC for them to then disseminate to their respective constituencies as they see fit.
2. Referencing Page ES-8 of the EAMR, the Committee disagrees with a statement made under the "Noise" heading. Specifically, this section states (at the close of the first paragraph) that, "Noise was measured during weekday peak hours to obtain the existing noise levels when school was in session and seasonal visitors still resided within the local area." Given the dates which the EAMR cites for its field measurements (May 17, 23, and 30, 2007), the Committee would like to assert that a significant portion of the seasonal visitors (also known as "snowbirds") typically leave the area on or about April 15th.

3. There is concern, on the part of some Committee members, as to the basic validity of the EAMR's noise conclusions. Specifically, certain members reject: 1) the basic idea that the post-construction roadway could actually be less "noisy" than the present roadway, and 2) the study's conclusions that no additional noise-mitigation measures (other than rubberized asphalt) are warranted. It is, however, important to note that this is not a consensus position by the Committee, but instead the position of some of its members.
4. The Committee would respectfully request that the Board consider some mechanism to expand this roadway improvement project and to authorize the extension of its four-lane, divided roadway cross-section northward to Western Way. This request is made due to safety and capacity concerns which the CAC believes will otherwise arise when the new four-lane, divided section is transitioned to the existing two-lane roadway.
5. The Committee respectfully requests that the Board require an emergency-warning/traffic-control signal for the existing Drexel Heights Fire District station on Kinney Road (just beyond the proposed limits of this project). This improvement would occur at whatever time the remaining portion of Kinney Road is improved northward to Western Way. In the current condition, exiting emergency-response vehicles must wait for passing traffic to clear before entering Kinney Road.
6. Due to the existence of various overlay zones in the area (e.g. the gateway/scenic route overlay for private developments), together with the various requirements of the environmentally-sensitive roadways ordinance, the Committee would request that the Board consider a process whereby such multiple ordinances can be integrated and effectively synthesized into a single, cohesive entity so as to better insure their application and enforcement.
7. Additionally, and while technically not related to this public road improvement project, the Committee would like to nonetheless express its support for the planned shopping center at the northwest corner of Kinney Road and Ajo Way. This development fulfills a long-standing need for commercial services in this historically under-served area. The CAC is aware that there is a good deal of enthusiasm and anticipation of this project by the residents in the vicinity.
8. The sentiment expressed in Item 7 above notwithstanding, the National Park Service representative on the CAC requests, with Committee support, that the Board of Supervisors consider the pressing need for a strategic planning effort that would address the vehicular-traffic "draw" that the shopping center will create (along with other potential commercial developments on the hard-zoned property in the area) and the related traffic impacts from same that will affect both Saguaro National Park and Tucson Mountain Park.

