

# D-List Categorical Exclusion

State Route (SR) 14

Interstate (I) 55 Exit Ramp to Southbound SR-14, Bridge over SR-14, Log Mile 7.44;  
and SR-14 Bridge over I-55, Log Mile 7.46

City of Memphis

Shelby County

PIN 128674.00

Submitted Pursuant to the National Environmental Policy Act of 1969, 42 U.S.C. 4332(2)

# Project Information

## General Information

**Route:** State Route (SR) 14

**Termini:** Interstate (I) 55 Exit Ramp to Southbound SR-14, Bridge over SR-14, Log Mile 7.44;  
and SR-14 Bridge over I-55, Log Mile 7.46

**Municipality:** City of Memphis

**County:** Shelby

**PIN:** 128674.00

**Plans:** Transportation Investment Report (TIR)

**Date of Plans:** 01/05/2021

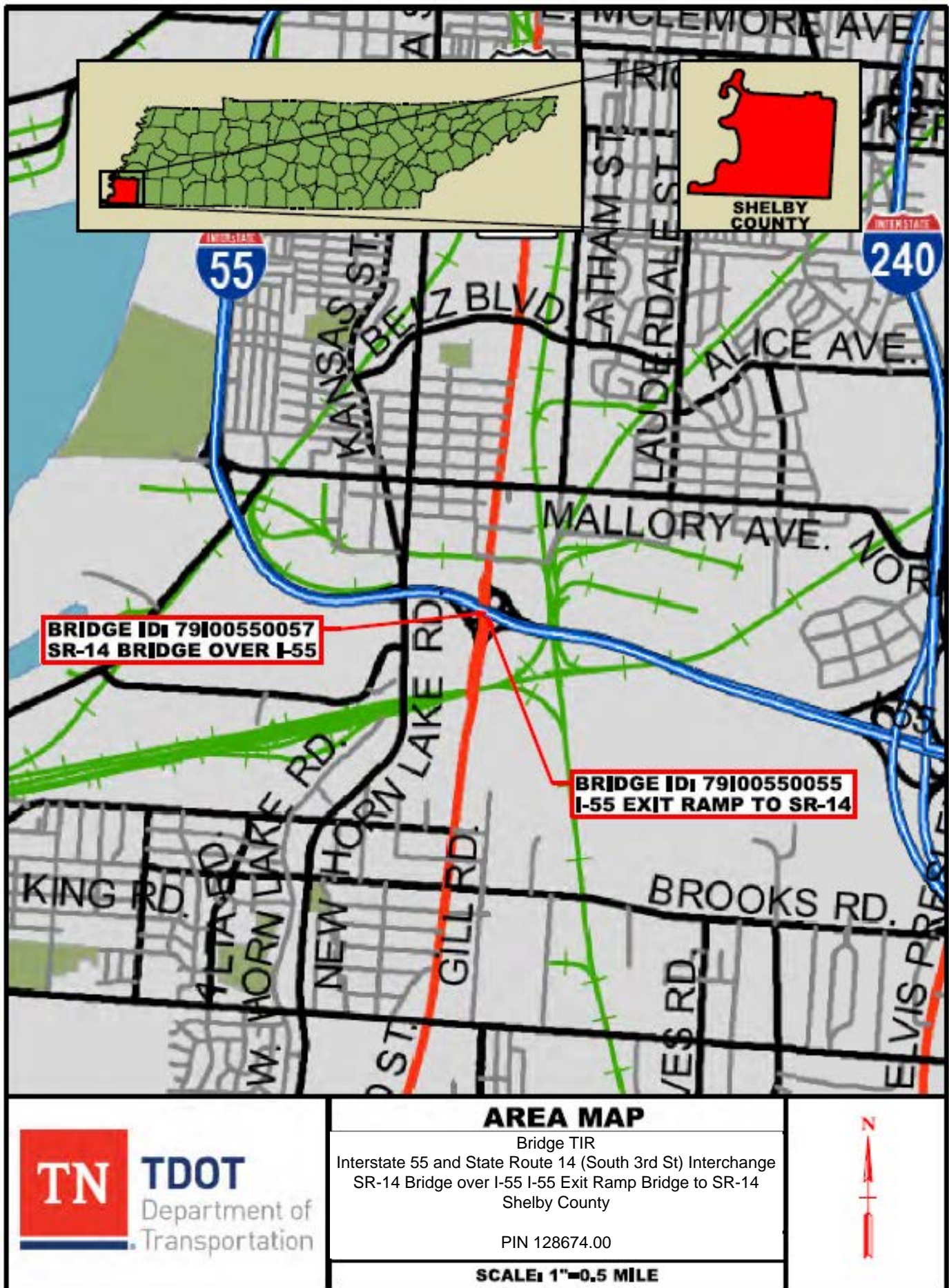
## Project Funding

**Planning Area:** Memphis MPO

**STIP/TIP:** TN-NHPP-2014-04-National Highway System Preservation and Operation Grouping

Funding Source	Preliminary Engineering	Right-of-Way	Construction
Federal	BR-I-55-1(135)	BR-I-55-1(135)	BR-I-55-1(135)
State	79005-0175-14	79005-2175-14	79005-3175-14

# Project Location



# Project Overview

## Introduction

The Tennessee Department of Transportation (TDOT), with cooperation from the Federal Highway Administration (FHWA), proposes to replace two bridges in Shelby County at:

- Interstate (I) 55 Exit Ramp Bridge to Southbound State Route (SR) 14, Bridge over SR-14 (Log Mile (LM) 7.44) Bridge ID: 79I00550055; and
- SR-14 Bridge over I-55 (LM 7.46) Bridge ID: 79I00550057.

This federal-aid highway project has been determined to be a "D-List CE pursuant to 23 CFR 771.117(d)(13), "Actions described in paragraphs (c)(26), (c)(27), and (c)(28) of this section that do not meet the constraints in paragraph (e) of this section". The project does meet the constraints of 23 CFR 771.117(e)(4), "Construction of temporary access or the closure of existing road, bridge, or ramps that would result in major traffic disruptions." The project exceeds the following threshold listed in Section IV(A)(1)(b)(iii) of the 2022 Programmatic Agreement between the Federal Highway Administration, Tennessee Division and the Tennessee Department of Transportation, and is therefore not eligible for processing as a Programmatic Categorical Exclusion (PCE). Paragraph iii: Involves the construction of temporary access, or the closure of an existing road, bridge, or ramps, that would result in major traffic disruptions. Traffic and access disruptions are considered major if designated travel detours would result in an additional travel distance greater than 5 miles in urban areas or 25 miles in rural areas.

## Background

I-55 Exit Ramp Bridge to Southbound SR-14, Bridge over SR-14 (Bridge ID: 79I00550055) and SR-14 Bridge over I-55 (Bridge ID: 79I00550057) were identified as bridge replacement projects by the TDOT Structures Division. A Transportation Investment Report (TIR) was prepared for the proposed bridge replacement projects and was approved on 01/05/2021.

Every two years, TDOT performs a comprehensive inspection and subsequent evaluation of all public bridges across the state in order to determine the status of their working condition and operating limits to ensure that they are in accordance with FHWA's National Bridge Inspection Standards (NBIS). These inspections are recorded and published in the National Bridge Inventory (NBI) Tennessee Inventory and Appraisal Report. One of the components of this evaluation is the designation of a sufficiency rating. A sufficiency rating is calculated for each individual bridge that is used to carry vehicular traffic. Ratings are measured on a scale of 0 to 100. A rating of 100 corresponds to a bridge that qualifies as an "entirely sufficient bridge," while a rating of 0 denotes a bridge that is "entirely deficient." Bridges that receive a sufficiency rating of less than 80.0 are eligible for rehabilitation; bridges that earn a rating below 50.0 are eligible for replacement. Another component of the NBI are the condition ratings. Condition ratings are used to describe the existing, in-place bridge as compared to the as-built condition. The physical condition of the deck, superstructure, and substructure components of a bridge are evaluated for a condition rating. Condition ratings are assigned codes ranging from 0-9, with 0 being failed condition and 9 being excellent condition. Another component of the NBI are the appraisal ratings. Appraisal ratings are used to evaluate a bridge in relation to the level of service that it provides. The structure is compared to a new structure built to current standards for the particular type of road. Components evaluated and given an appraisal rating include the structural evaluation, deck geometry, the underclearance rating, waterway adequacy, and the approach roadway alignment. Appraisal ratings are assigned codes ranging from 0-9, with 0 being a closed bridge and 9 being superior to present desirable criteria.

According to the TDOT NBI Tennessee Inventory and Appraisal Report dated 03/08/2022, I-55 Exit Ramp Bridge to



Southbound SR-14, Bridge over SR-14 (Bridge ID: 79I00550055) received a sufficiency rating of 72.0. The deck, superstructure, and substructure received condition ratings of 6 (satisfactory condition; some minor problems). The structural evaluation received an appraisal rating of 6 (equal to present minimum criteria). The deck geometry received an appraisal rating of 4 (meets minimum tolerable limits to be left in place as is). The underclearance rating received an appraisal rating of 3 (intolerable, requiring a high priority of corrective action) and the approach roadway alignment received an appraisal rating of 8 (equal to present desirable condition). Per the evaluation provided in the TIR dated 01/05/2021, the base year (2024) average daily traffic (AADT) for Bridge No. 79I00550055 (I-55 Exit Ramp to Southbound SR-14, Bridge over SR-14, LM 7.46) was 12,610 vehicles per day and the design year (2044) AADT was projected to be 11,320 vehicles per day.

According to the TDOT NBI Tennessee Inventory and Appraisal Report dated 03/08/2022, SR-14 Bridge over I-55 (Bridge ID: 79I00550057) received a sufficiency rating of 66.0. The deck received a condition rating of 7 (good condition; some minor problems). Both the superstructure and substructure received condition ratings of 5 (fair condition; all primary structural elements are sound, but may have minor section loss, cracking, spalling, or scour). Both the structural evaluation and deck geometry received appraisal ratings of 5 (somewhat better than minimum adequacy to tolerate being left in place as is). The underclearance rating received an appraisal rating of 3 (intolerable, requiring a high priority of corrective action). The approach roadway alignment received an appraisal rating of 8 (equal to present desirable condition). Per the evaluation provided in the TIR dated 01/05/2021, the base year (2024) AADT for Bridge No. 79I00550057 (SR-14 Bridge over I-55, LM 7.46) was 25,590 vehicles per day and the design year (2044) AADT was projected to be 38,790 vehicles per day.

The approved TIR, dated 01/05/2021, and the TDOT NBI Tennessee Inventory and Appraisal Reports for both bridges are provided in the Technical Appendices and serve as the focus of this evaluation.

# Project Development

## Need

The proposed project is needed to address insufficient structural elements of I-55 Exit Ramp Bridge to Southbound SR-14, Bridge over SR-14 (Bridge ID: 79I00550055) and SR-14 Bridge over I-55 (Bridge ID: 79I00550057) and as indicated by their assigned condition ratings and underclearance ratings. According to the TDOT NBI Tennessee Inventory and Appraisal Reports, the appraisal ratings for both bridges regarding underclearance, was 3 (intolerable, requiring a high priority of corrective action). The vertical clearance of the existing structures are too low, resulting in low-clearance accidents. The grade of Bridge No. 79I00550055 will be raised to increase the vertical clearance to a minimum of 18 feet 4 inches over the improved SR-14 grade. The grade of Bridge No. 79I00550057 will be raised to increase the vertical clearance to provide a minimum of 17 feet 6 inches.

## Purpose

The purpose of the proposed project is to address the structural deficiencies and underclearance issues of I-55 Exit Ramp Bridge to Southbound SR-14, Bridge over SR-14 (Bridge ID: 79I00550055) and SR-14 Bridge over I-55 (Bridge ID: 79I00550057) by replacing the existing bridges with new structures that meet current TDOT design standards.

## Range of Alternatives

Other than the selected design, were any alternative build designs developed for this project?

No

### No-Build

In the development of design solutions that address the needs outlined above and achieve the purpose of the project, TDOT evaluated the potential consequences should the project not be implemented. This option, known as the No-Build alternative, assumed the continuation of current conditions and set the baseline from which the impacts of the selected design were compared. The No-Build Alternative was not selected as it does not meet the purpose and need of the proposed project.

## Public Involvement

Has there been any public involvement for the project?

No

## Existing Conditions and Layout

According to the TIR, Bridge No. 79I00550055 (I-55 Exit Ramp to Southbound SR-14, Bridge over SR-14, LM 7.44), is a seven span concrete and steel bridge that is 512 feet long with one 16 feet wide lane and shoulder widths of two feet (Figure 1). The existing vertical clearance is 14 feet 6 inches. The posted speed limit is 40 MPH. The bridge route is classified as Urban Interstate to Urban Arterial. This project bridge was constructed in 1963.

According to the TIR, Bridge No. 79I00550057 (SR-14 Bridge over I-55, LM 7.46) is a four span concrete bridge that is 192 feet long with six 12 feet wide lanes, four feet wide median, and curb and gutter with sidewalk (Figure 2). The existing vertical clearance is 13 feet 11 inches on I-55 southbound. The posted speed limit on the bridge is 40 miles per hour (MPH). The bridge route is classified as Urban Principal Arterial. This project bridge was constructed in 1964.

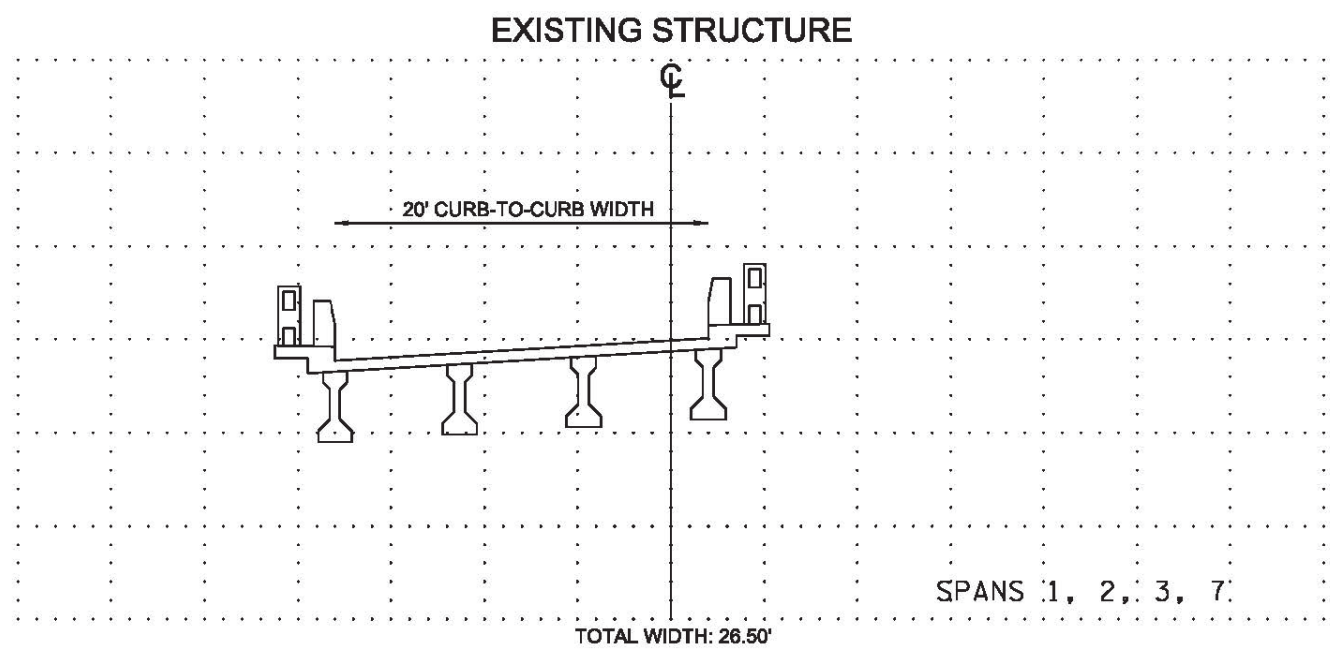
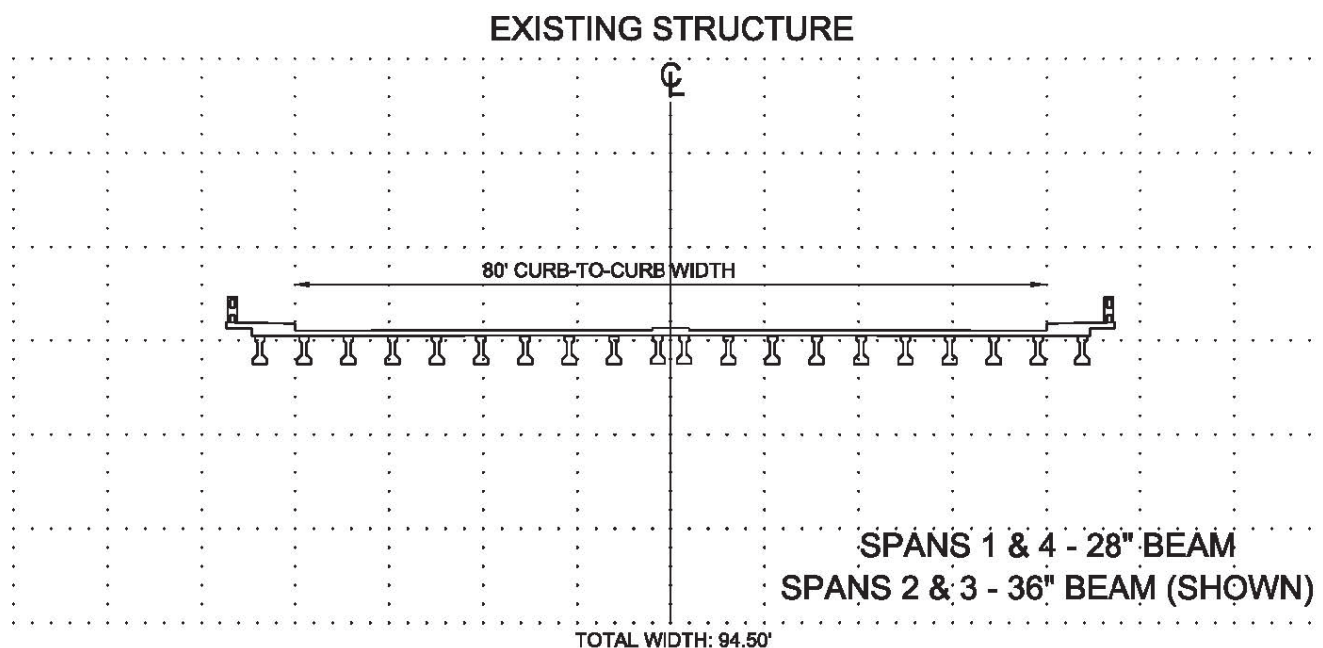


Figure 1. Depiction of existing structure (Bridge ID: 79I00550055), from TIR (01/05/2021)



**Figure 2. Depiction of existing typical section (Bridge ID: 79I00550057), from TIR (01/05/2021)**

## Proposed Project Description

TDOT is planning improvements to the I-55 interchange at SR-14 in Shelby County. The project includes the replacement of the two bridges within the interchange, as well as improvements to SR-14 and ramp alignments. The project is primarily planned within existing right-of-way (ROW) however, a small area of ROW acquisition (less than 0.1 acres) is proposed in the northwest portion of the project.

According to the TIR, the proposed structure to replace Bridge No. 79I00550055 (I-55 Exit Ramp to Southbound SR-14, Bridge over SR-14, LM 7.44) will be a 5 span steel bridge that is 660 feet long with an out-to-out width of 43 feet 3 inches, consisting of two 12 feet wide lanes and shoulder widths of six feet (inside) and 12 feet (outside), but will be striped for one lane (Figure 3). The piers will be placed in new locations. The grade will be raised to increase the vertical clearance to a minimum of 18 feet 4 inches over the improved SR-14 grade. The project will extend approximately 615 feet from the structure to the east and approximately 605 feet to the south in order to tie into the existing vertical grade.

According to the TIR, the proposed structure to replace Bridge No. 79I00550057 (SR-14 Bridge over I-55, LM 7.46) will be a two span, pre-stressed concrete bridge that is 200 feet long with an out-to-out width of 94 feet 6 inches, consisting of six 12 feet lanes, four feet flush median, and curb and gutter with a 6 feet 6 inches wide sidewalk on both sides (Figure 4). The grade will be raised to increase the vertical clearance to provide a minimum of 17 feet 6 inches. The project will extend approximately 755 feet from the structure to the south and approximately 505 feet to the north in order to tie into the existing vertical grade.

For both proposed bridges, the horizontal alignment will remain as existing.



# Proposed Typical Section

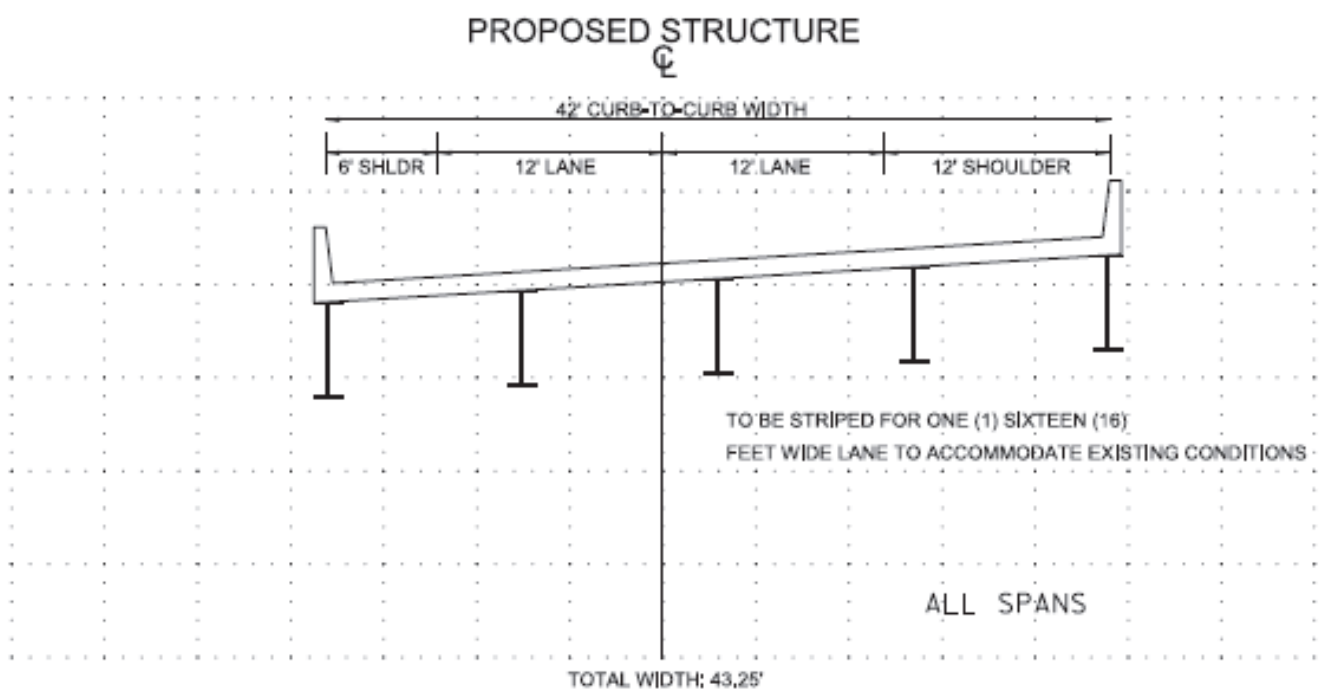


Figure 3. Depiction of proposed typical section (Bridge ID: 79I00550055), from TIR (01/05/2021)

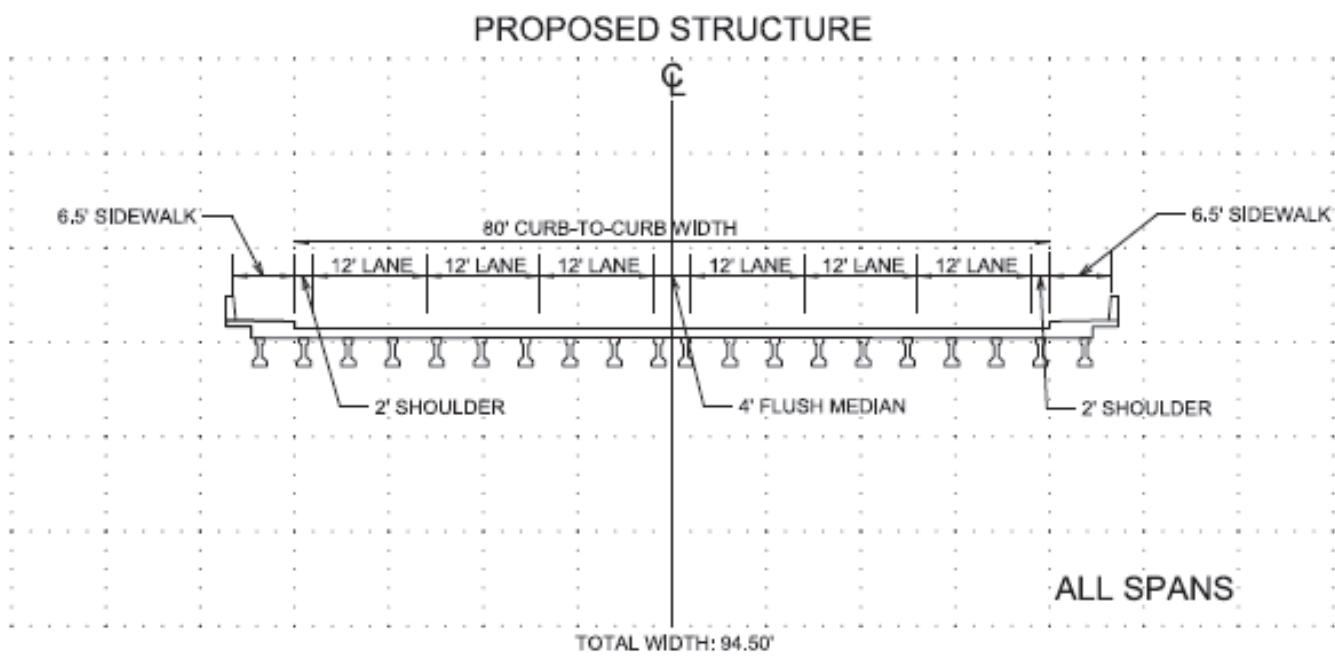


Figure 4. Depiction of proposed typical section (Bridge ID: 79I00550057), from TIR (01/05/2021)

## Right-of-Way

Does this project require the acquisition of right-of-way or easements?

Yes

Right-of-Way Acquisition Table

Permanent Acquisition			Temporary Acquisition		
R.O.W Acquisition	Drainage Easements	Total	Slope Easements	Construction Easements	Total
0	0	0	0	0	0

\*Measured in acres

ROW is anticipated for this project however, the exact amount and location of proposed acquisitions are not known as this time. Updated ROW information will be addressed in a future reevaluation as the project continues to develop and that information becomes available.

## Displacements and Relocations

Will this project result in residential, business or non-profit displacements and relocations?

No

## Changes in Access Control

Will changes in access control impact the functional utility of any adjacent parcels?

No

## Traffic and Access Disruption

At this time, are traffic control measures and temporary access information available?

Yes

Will this project involve traffic control measures that may result in major traffic disruptions?

Yes

During the replacement of I-55 Exit Ramp Bridge to Southbound SR-14, Bridge over SR-14 (Bridge ID: 79I00550055), the bridge will be removed and traffic will be maintained by rerouting traffic to the northbound I-55 ramp to northbound SR-14 on a widened ramp consisting of two 12 feet lanes. The southbound SR-14 traffic will utilize temporary double left turn lanes and a temporary signal for the duration of the ramp bridge construction. A truck detour shall be signed for northbound I-55 to SR-14 using I-55 southbound from the I-240 interchange to SR-175 (Shelby Drive) (Figure 5). The truck detour is approximately 14 miles with an approximate travel time of 25 minutes.

The replacement of SR-14 Bridge over I-55 (Bridge ID: 79I00550057) will be constructed with two lanes (one lane in each direction) of traffic maintained at all times on SR-14 and I-55.

**TRUCK DETOUR FOR I-55 NB TO SR-14**  
**MAXIMUM DETOUR DISTANCE: APPROX. 14 MILES TO SR-14 NB**  
**DETOUR TIME: APPROX. 25 MINUTES TO SR-14 NB**

**BRIDGE ID: 79|00550055**  
**I-55 EXIT RAMP TO SR-14**



### DETOUR MAP

Bridge TIR  
 Interstate 55 and State Route 14  
 (South 3rd St) Interchange  
 I-55 Exit Ramp Bridge to SR-14 (LM 7.44)  
 Shelby County

**PIN 128674,00**

**SCALE: 1"=0.8 MILE**



Figure 5. Detour Map, from TIR (01/05/2021)

# Environmental Studies

## Water Resources

Are there any water resources, wetlands or natural habitat located within the project area?

Yes

Water Resource Table for NEPA Documentation

Based on: Planning Report

Date: 1/5/2021

Table Amounts are based on (choose only one): Estimated extent of resource within ETSA

Water Resources (Non-Wetland)							
Label	Type	Latitude	Longitude	Receiving Waters	Quality	Amount (Linear Feet)	Amount (Acres)
STR-1	Perennial Stream	35.078076	-90.058621	Nonconnah Creek	Unassessed	3,113	1.33
STR-2	Perennial Stream	35.078299	-90.058958	Nonconnah Creek	Unassessed	414	0.09
Total:						3,527	1

In correspondence dated 11/03/2022, the TDOT Ecology Section stated, "Based on the Transportation Investments Report (TIR) dated 01/05/2021, an Environmental Boundaries Report dated 11/03/2022 has been completed. There are two (2) streams within the study area."

According to the Environmental Boundaries Report (EBR) dated 11/03/2022, there are two perennial streams (STR-1 and STR-2) within the project area. According to the Water Resource Table for NEPA Documentation, 3,113 feet of total impacts are estimated for STR-1; 414 feet of total impacts are estimated for STR-2.

The correspondence from the TDOT Ecology Section, a copy of the EBR, and a copy of the Water Resource Table for NEPA Documentation, are provided in the Technical Appendices.

## Protected Species

Is the MOA between TDOT and TDEC-DNA (2022) applicable to this project?

Yes

### Rare Species Dataviewer:

The TDEC Rare Species Dataviewer was reviewed on 08/29/2022.

### U.S. Fish and Wildlife Service (USFWS):

Coordination with the USFWS was completed on 09/20/2022.

In correspondence dated 09/20/2022, USFWS concluded "Our database and the information provided do not indicate that any federally listed or proposed species would occur or that designated critical habitat is present within your project area. Therefore, we do not anticipate take of any federally listed species resulting from the project. Based on the best information available at this time, we believe that the requirements of the Endangered Species Act (ESA) are fulfilled for all species that currently receive protection under the ESA."

The correspondence from USFWS is provided in the EBR in the Ecology section of the Technical Appendices.

## Tennessee Wildlife Resources Agency (TWRA):

Coordination with TWRA was completed on 09/22/2022.

In correspondence dated 09/22/2022, TWRA concluded that they "have no concerns regarding the project and do not anticipate adverse impacts to state listed species under our authority due to the project."

The correspondence from TWRA is provided in the EBR in the Ecology Section of the Technical Appendices.

## Floodplain Management

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**Flood Zone:** Zone AE (Cross Hatched) - Floodway Area in Zone AE

Portions of this project impact a FEMA defined floodplain where a floodway is defined. A No Rise Certification or a CLOMR/LOMR will be submitted for the project and it will be consistent with the Memorandum of Understanding (MOU) between FHWA and FEMA. The design of the roadway system will be consistent with the Memorandum of Understanding (MOU) between FHWA and FEMA and with the floodplain management criteria set forth in the National Flood Insurance Regulations of Title 44 of the Code of Federal Regulations (CFR). It will be consistent with the requirements of floodplain management guidelines for implementing Executive Order 11988 and FHWA guidelines 23 CFR 650A.

The project is located on the following FEMA Flood Insurance Rate Map (FIRM):

- Panel 410 of 635, Map Number 47157C0410F in Shelby County.

Portions of the FEMA FIRM are included in the Technical Appendices.

## Air Quality

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### Transportation Conformity:

On 08/27/2022, the TDOT Air Quality and Noise Section stated, "The project is in the Memphis/Shelby County ozone maintenance area. However, this bridge repair project is exempt from conformity per Table 2 of 40 CFR 93.126."

The correspondence from the TDOT Air Quality and Noise Section is provided in the Technical Appendices.



## Noise

In accordance with FHWA requirements and TDOT's Noise Policy this project is determined to be **Type III**

No significant noise impacts are anticipated for this project and a noise study is not needed.

## Farmland

Is this project exempt from the provisions of the Farmland Protection Policy Act (FPPA)? **Yes**

**FPPA Exemption:** Small Acreage (3 acres or less for an existing bridge or interchange).

## Section 4(f)

Does this project involve the use of property protected by Section 4(f) (49 USC 303)? **No**

## Section 6(f)

Does this project involve the use of property assisted by the L&WCF? **No**

## Cultural Resources

Does the Interstate Highway exemption or MOU between TDOT and the SHPO (2015) apply? **No**

Are NRHP listed or eligible cultural resources within the project Area of Potential Effect (APE)? **No**

### Archaeology Concurrence:

Concurrence from the TN State Historic Preservation Office (TN-SHPO) was received on 01/09/2023.

On 01/10/2023, the TDOT Archaeology Section stated, "Based on conceptual plans dated 7/23/20 within a Bridge Transportation Investment Report dated 1/5/21, the TN-SHPO concurred on 1/9/23 with TDOT Archaeology that no archaeological resources eligible for listing in the National Register of Historic Places will be affected by this undertaking. Should project plans change, then the project will need to be reevaluated by TDOT Archaeology."

On 04/06/2023, the TDOT Historic Preservation Section stated, "In a letter dated 04/06/2023, the TN-SHPO concurred that the APE included one property eligible for listing in the National Register of Historic Places: the Nonconnah Creek Pumping Station. The SHPO agreed that project as currently proposed will not adversely affect the Nonconnah Creek Pumping Station. If project plans change, further consultation may be required."

The correspondence from the TDOT Archaeology Section, the TDOT Historic Preservation Section, and the TN-SHPO is provided in the Technical Appendices.

# Native American Consultation

Does this project require Native American consultation?

Yes

Native American Consultation was requested on 09/19/2022.

Native American Consultation					
Sent	Response		Sent	Response	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Absentee Shawnee Tribe of Oklahoma	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Muscogee (Creek) Nation
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cherokee Nation	<input type="checkbox"/>	<input type="checkbox"/>	Poarch Band of Creek Indians
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Chickasaw Nation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Quapaw Nation
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Choctaw Nation of Oklahoma	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Shawnee Tribe
<input type="checkbox"/>	<input type="checkbox"/>	Eastern Band of Cherokee Indians	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Thlopthlocco Tribal Town
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Eastern Shawnee Tribe of Oklahoma	<input checked="" type="checkbox"/>	<input type="checkbox"/>	United Keetoowah Band of Cherokee Indians
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Kialegee Tribal Town	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other

## Chickasaw Nation:

The response was received on 10/04/2022.

On 10/04/2022, the Chickasaw Nation stated, "Thank you for the email notifications regarding the Tennessee Division of Federal Highway Administration initiating early coordination for the proposed projects delineated in the attached table. We have reviewed the brief descriptions, maps, and coordinates of the project sites, and the Chickasaw Nation does desire to consult under Section 106 of the National Historic Preservation Act on these projects. We appreciate your efforts to preserve and protect significant historic properties."

## Choctaw Nation of Oklahoma:

The response was received on 10/18/2022.

On 10/18/2022, the Choctaw Nation of Oklahoma stated, "The Choctaw Nation of Oklahoma thanks you for the correspondence regarding the above referenced project. Shelby County, Tennessee lies within our area of historic interest. The Choctaw Nation Historic Preservation Department would like to be included as a consulting party on the project."

## Eastern Shawnee Tribe of Oklahoma:

The response was received on 10/26/2022.

On 10/26/2022, the Eastern Shawnee Tribe stated, "The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Shelby County, TN. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects. As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically."

However, the project proposes NO Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation."

On 04/10/2023, the TDOT Native American Coordination Section stated, "An invitation to participate in the Section 106 process was sent on September 19, 2022 to all federally recognized Native American tribes with interests in the subject county.

The Chickasaw Nation responded and accepted the invitation to be a consulting party on October 4, 2022. Reports were sent to this consulting party on April 10, 2023.

The Choctaw Nation of Oklahoma responded and accepted the invitation to be a consulting party on October 18, 2022. Reports were sent to this consulting party on April 10, 2023.

The Eastern Shawnee Tribe responded on October 26, 2022 with a finding of "no adverse effect."

To date, no other responses have been received. TDOT will re-initiate consultation if additional cultural resources studies are required or if archaeological materials or human remains are discovered during construction.

(Following guidance issued on April 8, 2020 by the Advisory Council on Historic Preservation (ACHP) in response to the COVID-19 outbreak, federal agencies are to remain flexible regarding federally recognized Native American tribes' Section 106 review responsibilities. The ACHP's guidance furthermore indicates that federal agencies may not foreclose on the statutory rights afforded to federally recognized Native American tribes under the National Historic Preservation Act and regulations implementing Section 106 of the Act. As several federally recognized Native American tribes with interests in Tennessee have indicated that their ability to carry out their Section 106 review responsibilities is diminished or otherwise limited, it should be expected that tribal responses for the subject project may be received subsequent to the date of this ESR and that any such response may require additional information, fieldwork, or coordination with any or all tribes and, perhaps, the SHPO and/or ACHP. An updated ESR will be provided in the event that any additional responses are received, along with updated Section 106 documentation, if any.)"

The correspondence from the TDOT Native American Coordination Section is provided in the Technical Appendices.

Are there any disproportionately high or adverse effects on low-income or minority populations?

No

Minority Populations										
Census Tract (CT) Block Group (BG)	CT 53 BG 3	CT 55 BG 2	CT 55 BG 3	CT 56 BG 2	CT 56 BG 3	CT 78.22 BG 1	CT 222.20 BG 1	CT 222.20 BG 2	CT 225 BG 1	Shelby County
Total Population	1,871	170	600	1,212	1,328	1,313	797	638	2,078	929,178
Total Minority Population	1,871	148	579	1,185	1,328	1,153	574	638	1,559	605,053
% Minority/Non-White	100.0%	87.1%	96.5%	97.8%	100.0%	87.8%	72.0%	100.0%	75.0%	65.1%
Exceeds County % by 10 Percentage Points or More	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	N/A
Exceeds 50% of Block Group Population	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A
Meet EJ Criteria?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A
Low-Income Populations										
Census Tract (CT) Block Group (BG)	CT 53 BG 3	CT 55 BG 2	CT 55 BG 3	CT 56 BG 2	CT 56 BG 3	CT 78.22 BG 1	CT 222.20 BG 1	CT 222.20 BG 2	CT 225 BG 1	Shelby County
Total Population	1,871	170	600	1,212	1,328	1,313	797	638	2,078	929,178
Total Low-Income Population	996	11	345	318	467	351	548	458	648	169,223
% Low-Income/Below Poverty Line	53.2%	6.5%	57.5%	26.2%	35.2%	26.7%	68.8%	71.8%	31.2%	18.2%
Exceeds County % by 10 Percentage Points or More	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	N/A
Exceeds 50% of Block Group Population	Yes	No	Yes	No	No	No	Yes	Yes	No	N/A
Meet EJ Criteria?	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	N/A

The EJ analysis utilized U.S. Census Bureau data from the 2017-2021 American Community Survey (ACS) 5-Year Estimates database. The proposed project encompasses nine census block groups within Shelby County: Census Tract (CT) 53, Block Group (BG) 3; CT 55, BG 2; CT 55, BG 3; CT 56 BG 2; CT 56 BG 3; CT 78.22 BG 1; CT 222.20 BG 1; CT 222.20 BG 2, and CT 225, BG 2. The EJ Table (above) displays the population data for these block groups comparing their respective minority population and low-income population percentages to that of the entire county.

On February 11, 1994, President William J. Clinton issued Executive Order (EO) 12898, Federal Actions to Address Environmental Justice (EJ) in Minority and Low-Income populations. This EO stated that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations."

## Minority Populations

The 2017-2021 ACS 5-year estimates show that the minority population for Shelby County is approximately 65.1 percent. Within the project area, minority populations range from approximately 72 percent (CT 222.20, BG1) to approximately 100 percent (CT 53, BG 3; CT 56, BG 3; and CT 222.20, BG 2). All of the Block Groups have minority populations exceeding 50 percent of the total Block Group population. Block Groups that satisfy either of these criteria are considered to be EJ populations.

## Low-Income Populations

The 2017-2021 ACS 5-year estimates show that the low-income population for Shelby County is approximately 18.2

percent. Within the project area, low-income populations range from approximately 6.5 percent (CT 55, BG 2) to approximately 71.8 percent (CT 222.2, BG 2). Four of the Block Groups (CT 53, BG 3; CT 55, BG 3; CT 222.20, BG 1; CT 222.20, BG 2) have low-income populations that exceed 50 percent of the total Census Block Group population. Block groups that satisfy either of these criteria are considered to be EJ populations.

Environmental Justice Summary

Findings indicate that minority and low-income persons are present within the limits of the project area. There may be some adverse impacts based on ROW acquisition and temporary construction impacts; however, it is determined that this project is not expected to have disproportionately high and adverse effects to the EJ populations when compared to the general population. Further, the improvements associated with the project will be shared equally amongst all populations.

Documentation related to Environmental Justice is included in the Technical Appendices.

**Hazardous Materials**

**Does the project involve any asbestos containing materials?** **Yes**

An Asbestos Containing Materials (ACM) assessment report was completed on Bridge No. 79I00550057 (SR-14 Bridge over I-55, LM 7.46), dated 12/18/2013. According to the ACM assessment report, the bridge survey was completed on 12/12/2013 and 60 samples were taken. Asbestos was detected in one of the homogeneous areas sampled (13 drain pipes located on top of the bridge deck).

An Asbestos Containing Materials (ACM) assessment report was completed on Bridge No. 79I00550055 (SR-14 bridge over I-55, LM 7.44 and I-55 exit Ramp to Southbound SR-14 bridge over SR-14, LM 7.46), dated 07/11/2019. According to the ACM assessment report, the bridge survey was completed on 06/11/2019 and 48 samples were taken. ACM was not detected in any of the samples.

Correspondence from the TDOT Hazardous Materials Section and a copies of the ACM assessment reports are provided in the Technical Appendices.

**Does the project involve any other hazardous material sites?** **Yes**

On 08/25/2022, the TDOT Hazardous Materials Section stated, "Based on the Transportation Investment Report dated 5 January 2021, one known hazardous materials site is adjacent to the project. The proposed ROW is shown from TDEC UST Facility #9790857, Williams Equipment Co, 2425 South 3rd St. This is an inactive facility with two permanently out of use tanks. This facility is not listed by TDEC as having an environmental case. No further study is recommended at this time. The asbestos bridge surveys have been completed and the following project commitments have been submitted in PPRM. In the event hazardous materials or wastes are encountered within the right-of-way, notification shall be made per TDOT Standard Specifications for Road and Bridge Construction (January 1, 2021) Section 107.08.C. Disposition of hazardous materials or wastes shall be subject to all applicable regulations, including the applicable sections of the Federal Resource Conservation and Recovery Act, as amended; the Comprehensive Environmental Response, Compensation, and Liability Act, as amended; and the Tennessee Hazardous Waste Management Act of 1983, as amended. Databases reviewed include Google Earth imagery, EPA National Priorities List, EPA MyEnvironment, TDEC Registered Underground Storage Tanks Public Data Viewer and Data and Reports, TDEC Division of Water Resources Public Data Viewer and Oil and Gas Wells database, TDEC Division of Remediation Sites Public Data Viewer, TDOT Integrated Bridge Information System, and others, as necessary."



Correspondence from the TDOT Hazardous Materials Section and a copies of the ACM assessment reports are provided in the Technical Appendices.

## Bicycle and Pedestrian

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Does this project include accommodations for bicycles and pedestrians? **Yes**

On 08/29/2022, the TDOT Multimodal Transportation Resources Division stated, "This project accommodates multimodal users with sidewalks on both sides."

Correspondence from the TDOT Multimodal Transportation Resources Division is included in the Technical Appendices.

## Environmental Commitments

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Does this project involve any environmental commitments? **No**

## Additional Environmental Issues

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Are there any additional environmental concerns involved with this project? **No**

# Conclusion

## Review Determination

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### **Determination:** D-List Categorical Exclusion

This federal-aid highway project qualifies for a Categorical Exclusion under 23 C.F.R 771.117(d) and exceeds the thresholds listed in Section IV(A)(1)(b) of the 2022 Programmatic Agreement between the Federal Highway Administration, Tennessee Division and the Tennessee Department of Transportation. This project is therefore designated as a D-list Categorical Exclusion and requires Administration approval.

## Reference Material

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All source material used in support of the information and conclusions presented in this document are included in the technical appendices. The technical appendices are compiled as a separate document and include information on funding, agency concurrence, applicable agency agreements, special commitment support, project plans, technical reviews, reports and any other additional information.

## Preparer Certification

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By signing below, you certify that this document has been prepared in compliance with all applicable environmental laws, regulations and procedures. You can attest to the document's quality, accuracy, and completeness, and that all source material has been compiled and included in the technical appendices.

*Lindsey Postaski*

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**Document Preparer**

## Document Approval

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By signing below, you officially concur that this document is in compliance with all applicable environmental laws, regulations and procedures. You have reviewed and verified the document's quality, accuracy, and completeness and that all source material has been compiled and included in the technical appendices.

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**Tennessee Department of Transportation**

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**Federal Highway Administration**

# Attachments

## Acronyms

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<b>AADT</b>	Annual Average Daily Traffic	<b>NRCS</b>	Natural Resources Conservation Service
<b>ADA</b>	Americans with Disabilities Act	<b>NRHP</b>	National Register of Historic Places
<b>APE</b>	Area of Potential Effect	<b>PCE</b>	Programmatic Categorical Exclusion
<b>BMP</b>	Best Management Practice	<b>PIN</b>	Project Identification Number
<b>CAA</b>	Clean Air Act	<b>PM</b>	Particulate Matter
<b>CE</b>	Categorical Exclusion	<b>PND</b>	Pond
<b>CEQ</b>	Council on Environmental Quality	<b>RCRA</b>	Resource Conservation and Recovery Act
<b>CFR</b>	Code of Federal Regulations	<b>ROW</b>	Right-of-Way
<b>CMAQ</b>	Congestion Mitigation and Air Quality	<b>ROD</b>	Record of Decision
<b>DEIS</b>	Draft Environmental Impact Statement	<b>RPO</b>	Rural Planning Organization
<b>FEMA</b>	Federal Emergency Management Agency	<b>SIP</b>	State Implementation Plan
<b>FONSI</b>	Finding of No Significant Impact	<b>SNK</b>	Sinkhole
<b>EA</b>	Environmental Assessment	<b>SR</b>	State Route
<b>EIS</b>	Environmental Impact Statement	<b>STIP</b>	State Transportation Improvement Program
<b>EJ</b>	Environmental Justice	<b>STR</b>	Stream
<b>EPA</b>	Environmental Protection Agency	<b>TDEC</b>	TN Department of Environment and Conservation
<b>EPH</b>	Ephemeral Stream	<b>TDOT</b>	Tennessee Department of Transportation
<b>FHWA</b>	Federal Highway Administration	<b>TIP</b>	Transportation Improvement Program
<b>FIRM</b>	Flood Insurance Rate Map	<b>SHPO</b>	State Historic Preservation Office
<b>FPPA</b>	Farmland Protection Policy Act	<b>TPO</b>	Transportation Planning Organization
<b>GHG</b>	Greenhouse Gas	<b>TVA</b>	Tennessee Valley Authority
<b>GIS</b>	Geographic Information System	<b>TWRA</b>	Tennessee Wildlife Resources Agency
<b>IAC</b>	Interagency Consultation	<b>USDOT</b>	U.S. Department of Transportation
<b>LWCF</b>	Land and Water Conservation Fund	<b>USACE</b>	U.S. Army Corps of Engineers
<b>LOS</b>	Level of Service	<b>USFWS</b>	U.S. Fish and Wildlife Service
<b>MOA</b>	Memorandum of Agreement	<b>UST</b>	Underground Storage Tank
<b>MOU</b>	Memorandum of Understanding	<b>VMT</b>	Vehicle Miles Traveled
<b>MPO</b>	Metropolitan Planning Organization	<b>VPD</b>	Vehicles Per Day
<b>MSAT</b>	Mobile Source Air Toxics	<b>WWC</b>	Wet Weather Conveyance
<b>NEPA</b>	National Environmental Policy Act		