

Tennessee Environmental Evaluation Report

State Route 222

From Near Stanton Somerville Road (at Southernmost Intersection)

to Near Camp Ground Road

Haywood County

PIN 132709.00

Project Information

General Information

Route: State Route 222

Termini: From Near Stanton Somerville Road (at Southernmost Intersection) to Near Camp Ground Road

County: Haywood

PIN: 132709.00

Plans: Environmental Technical Study Area (ETSA)

Date of Plans: 02/16/2023

Project Funding

Planning Area: Southwest Tennessee Rural Planning Organization (RPO)

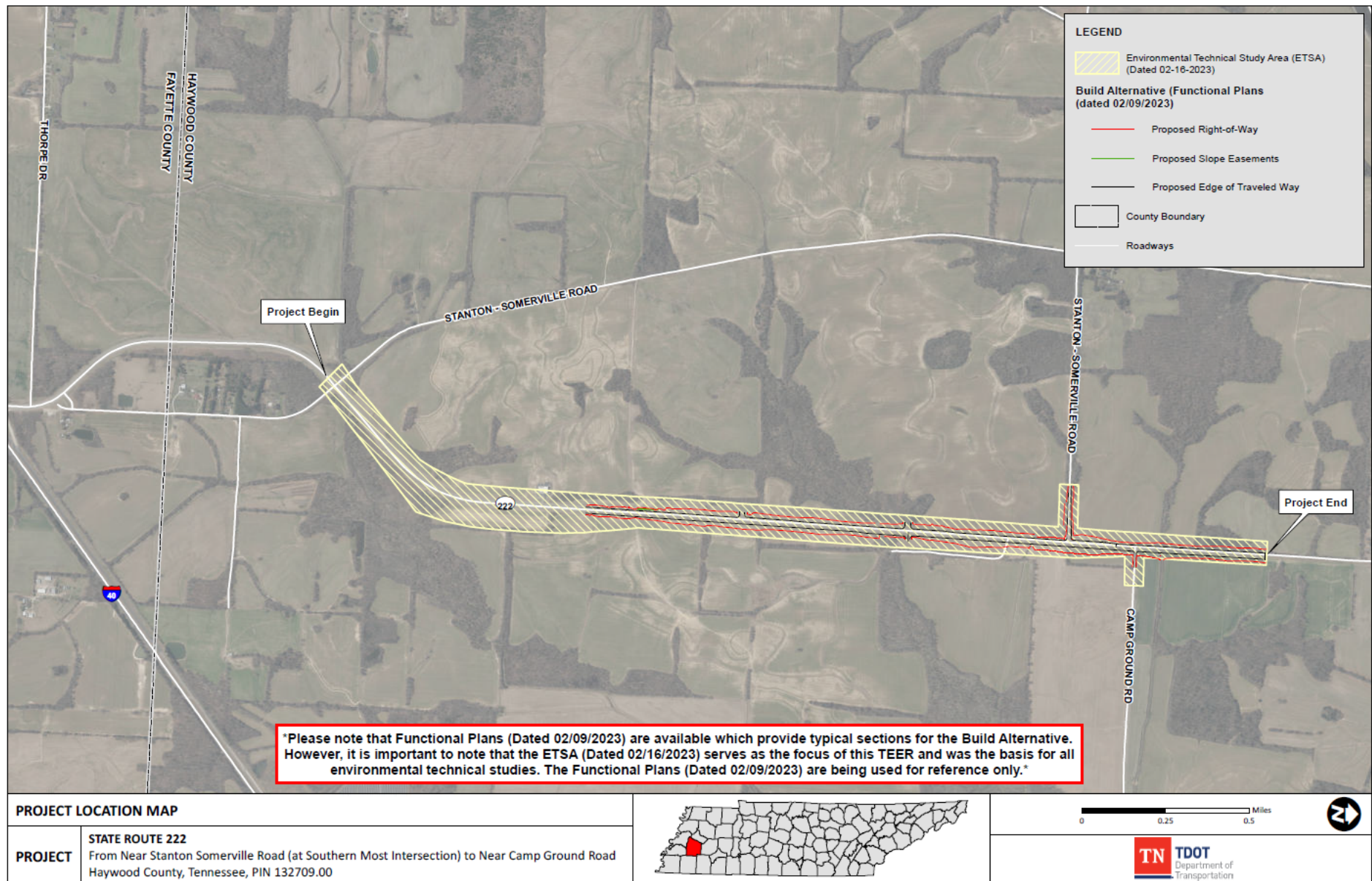
STIP/TIP: Not Applicable (State-Funded)

Table 1: Project Funding Numbers

Funding Source	Preliminary Engineering	Right-of-Way	Construction
Federal	N/A	N/A	N/A
State	R4S222-S1-002	R4S222-S2-002	R4S222-S3-002

Project Location

Figure 1: Project Location



Project Overview

Introduction

The Tennessee Department of Transportation (TDOT) proposes widening State Route (SR) 222, from near Stanton-Somerville Road (at Southernmost Intersection) to Near Camp Ground Road¹. Proposed improvements would total approximately 2.04 miles in length.

Due to the proposed project being funded exclusively with state funds, the project qualifies for being developed as a Tennessee Environmental Evaluation Report (TEER).

Background

Within the project vicinity is the Memphis Regional Megasite (MRM), which is a 4,100-acre site developed by the Tennessee Valley Authority (TVA) in 2006 and ultimately purchased by the State of Tennessee in 2009. The MRM is one of the largest available Megasite properties in the southeast². On September 27, 2021, Governor Bill Lee announced that the Ford Motor Company had selected the MRM for a vehicle and battery manufacturing campus. The Ford Motor Company Campus (Blue Oval City) is expected to occupy approximately 3,600 acres of the total MRM acreage. In total, approximately 5,800 jobs are anticipated to be created at the Ford Motor Company Campus (Blue Oval City), which is anticipated to increase travel demand for commuter traffic once site operations are underway. In addition, the amount of freight traffic both entering and exiting the MRM is anticipated to increase when the MRM is fully developed and operational.

¹ Due to the nature of the proposed project being pursued as a design build project, TDOT has updated the termini to include additional area to ensure that all potential work and environmental impacts would be accounted for within the ETSA (Dated 02/16/2023).

²Memphis Regional Megasite Site Assessment Study, Gresham Smith, 2021.

Project Development

Need

The needs for the proposed project have been identified as the following:

- **Support Ongoing Development in the Region** - The Ford Motor Company has selected the MRM for a vehicle and battery manufacturing campus. Following this development, additional industrial, commercial, and residential development is likely to occur at or near the MRM. Intermodal freight traffic is expected to accompany the new industrial activity at the MRM and the surrounding area is anticipated to experience increased commuter traffic, as most of the projected jobs are expected to be filled by workers currently residing outside of the immediate vicinity of the MRM.
- **Existing Geometric Deficiencies** - Existing SR-222 is a two to four-lane facility which does not have shoulders from approximately 700 feet south of Camp Ground Road to approximately 2,100 feet north of Camp Ground Road.

Purpose

The purpose for the proposed project have been identified as the following:

- **Accommodate Ongoing Development in the Region** - The proposed project would support known and future development, such as the Ford Motor Company Campus (Blue Oval City), currently under development within the MRM in this area, by providing a transportation facility capable of accommodating the transportation needs for both commuter and freight traffic.
- **Improve Geometric Deficiencies** - The proposed project would improve geometric deficiencies throughout the project area consistent with 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

Currently, SR-222 is classified as a major collector roadway and consists of the following typical sections:

- From approximately 2,000 feet north of Thorpe Drive to approximately 4,600 feet north of Stanton-Somerville Road - The existing SR-222 consists of a four-lane typical section with two travel lanes in each direction, a raised grassy median, and 10-foot paved outside shoulders on either side.
- From approximately 4,600 feet north of Stanton-Somerville Road to approximately 700 feet south of Camp Ground Road - The existing SR-222 consists of a two-lane typical section with one travel lane in each direction and 6-foot paved outside shoulders on either side.
- From approximately 700 feet south of Camp Ground Road to approximately 2,100 feet north of Camp Ground Road - The existing SR-222 consists of a two-lane typical section with one travel lane in each direction and no outside shoulders.

Proposed Project Description

The proposed project would widen exiting SR-222, from near Stanton-Somerville Road (at Southernmost Intersection) to Near Camp Ground Road. The proposed improvements would total approximately 2.04 miles in length. It is also important to note that there are two MRM connector roads which would intersect with SR-222 within the limits of the ETSA of the Build Alternative.

The Build Alternative would consist of the following two typical sections³:

- Typical Section 1, From just south of Stanton-Somerville Road to south of the MRM connector roads and from north of the MRM connector roads to north of Camp Ground Road - The typical section would consist of two 12-foot travel lanes in either direction with a 20-foot depressed center median, and 12-foot (10-foot paved) outside shoulders (see Figure 2).
- Typical Section 2, From south of the MRM connector roads to north of the MRM connector roads - The typical section would consist of two 12-foot travel lanes in either direction, two center left-turn-lanes, and 12-foot (10-foot paved) outside shoulders (see Figure 3).

Additionally, it is important to note an ETSA was developed for the project, which extends beyond the immediate footprint of the Build Alternative as described above. The ETSA is developed for a project in order to document natural, cultural, and community resources within a broader study area than the immediate footprint of the Build Alternative. That way, if the Build Alternative's alignment shifts during the development of the proposed project, TDOT staff are aware of any resources that are present in that larger study area.

The ETSA boundaries for the proposed project encompass an area that is generally 150-500 feet on either side of the Build Alternative's centerline and extends from near Stanton Somerville Road (at the southern most intersection) to near Camp Ground Road in Haywood County, Tennessee. The ETSA has a total acreage of approximately 193 acres. Refer to Appendix A for a visual representation of the ETSA.

³Please note that Functional Plans (Dated 02/09/2023) are available which provide typical sections for the Build Alternative. However, it is important to note that the ETSA (Dated 02/16/2023) which extends beyond the limits of the Build Alternative to allow for flexibility in the design, and serves as the focus of this TEER and was the basis for all environmental technical studies. The Functional Plans (Dated 02/09/2023) are being used for reference only in this section.

Proposed Typical Section

Figure 2: Typical Section 1
Source: Functional Plans (Dated 02/10/2023)

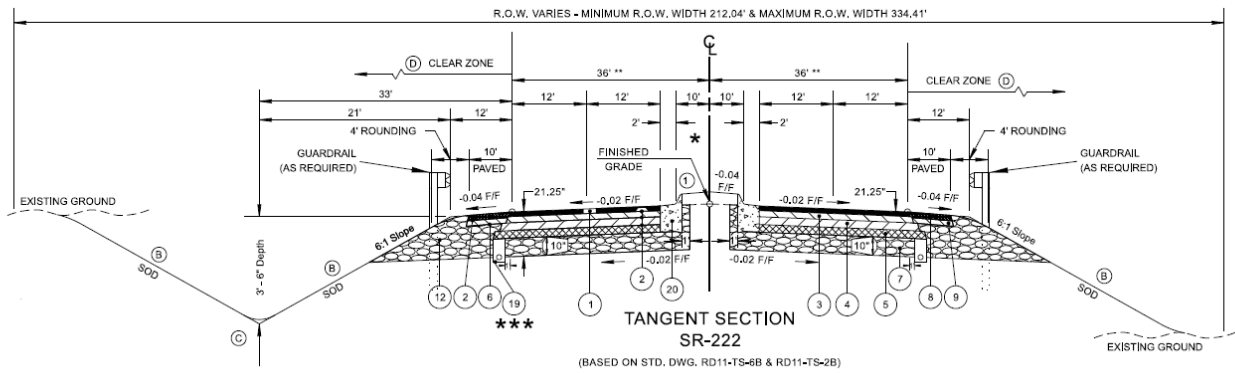
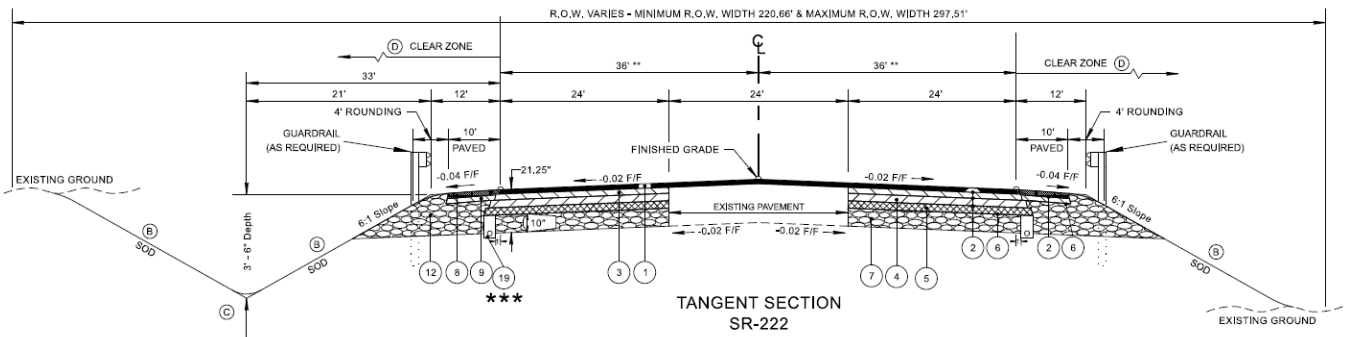


Figure 3: Typical Section 2
Source: Functional Plans (Dated 02/10/2023)



Right-of-Way

The ETSA for the Build Alternative encompasses approximately 193 acres. Exact amounts of right-of-way as well as permanent and temporary easements required for construction of the Build Alternative are unknown at this time as they would be heavily influenced by the final horizontal alignment which would be determined at a future date and as the project moves forward closer to construction.

Refer to Appendix A for a visual representation of the ETSA (Dated 02/16/2023).

Displacements and Relocations

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

No

The TDOT Right-of-Way Division provided the following Environmental Studies Response (ESR) on 04/05/2023:

"Based on the plans provided, there is one structure in the ETSA that is not currently within the proposed limits of the project. Therefore, there are no anticipated relocations. "

Refer to Appendix B for a copy of the TDOT Right-of-Way Division's ESR response dated 04/05/2023.

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?

No

Traffic control information is not available currently for the proposed project and will be developed as the project progresses through subsequent design phases.

Water Resources

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

Yes

An Updated Environmental Boundaries Report (EBR) was prepared for the proposed project on 03/21/2023. The 2023 Updated EBR indicated that seven perennial/intermittent streams, eight wet weather conveyances/ephemeral streams, nine wet weather conveyances/upland drainage features, and two wetlands were identified within the limits of the ETSA of the Build Alternative. No other features were identified within the limits of the ETSA of the Build Alternative.

Refer to Tables 2 and 3 for specific details regarding water resources and wetlands. Refer to Appendix C for a copy of the 2023 Updated EBR.

Table 2: Water Resources

Resource Type	Label	Quality	Impacts (Linear Feet)		
			Permanent	Temporary	Total
Intermittent Stream (STR)	STR-4	Not Supporting	501	0	501
Intermittent Stream	STR-5	Not Supporting	839	0	839
Perennial Stream	STR-26	Not Supporting	965	0	965
Intermittent Stream	STR-27	Unassessed	264	0	264
Intermittent Stream	STR-28	Not Supporting	549	0	549
Intermittent Stream	STR-29	Unassessed	944	0	944
Intermittent Stream	STR-30	Unassessed	856	0	856
Wet Weather Conveyance/Ephemeral	Wet Weather Conveyance/Ephemeral (WWC/EPH) - 9	Not Applicable	0	0	0
Wet Weather Conveyance/Ephemeral	WWC/EPH-12	Not Applicable	139	0	139
Wet Weather Conveyance/Ephemeral	WWC/EPH-13	Not Applicable	179	0	179
Wet Weather Conveyance/Ephemeral	WWC/EPH-78	Not Applicable	202	0	202
Wet Weather Conveyance/Ephemeral	WWC/EPH-80	Not Applicable	220	0	220
Wet Weather Conveyance/Ephemeral	WWC/EPH-86	Not Applicable	106	0	106
Wet Weather Conveyance/Ephemeral	WWC/EPH-87	Not Applicable	55	0	55
Wet Weather Conveyance/Ephemeral	WWC/EPH-88	Not Applicable	318	0	318

Table 2: Water Resources					
Resource Type	Label	Quality	Impacts (Linear Feet)		
			Permanent	Temporary	Total
Wet Weather Conveyance/Upland Drainage Feature	WWC/Upland Drainage Feature (UDF) -10	Not Supporting	396	0	396
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-11	Not Applicable	203	0	203
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-77	Not Applicable	47	0	47
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-79	Not Applicable	225	0	225
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-81	Not Applicable	214	0	214
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-82	Not Applicable	288	0	288
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-83	Not Applicable	393	0	393
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-84	Not Applicable	91	0	91
Wet Weather Conveyance/Upland Drainage Feature	WWC/UDF-85	Not Applicable	90	0	90
Total Stream Impacts (Linear feet)					4,918
Total Wet Weather Conveyance/Ephemeral (Linear feet)					1,219
Total Wet Weather Conveyance/Upland Drainage Feature (Linear feet)					1,947
Total Impacts (Linear feet)					8,084
Source: Updated Environmental Boundaries Report (Dated 03/21/2023). *Units measured in linear feet. Identification of features has not been reviewed by regulatory agencies and determinations of stream type could possibly be changed. Predicted impacts are considered "preliminary" and will not be completely accurate until the time of permit application.					

Table 3: Wetland Resources						
Resource Type	Label	Function	Quality	Impacts (Acre)		
				Permanent Impact	Temporary Impact	Total
Wetland	Wetland (WTL) - 28)	Emergent	Low Resource Value	0.03	0.00	0.03
Wetland	WTL - 29	Emergent	Low Resource Value	0.05	0.00	0.05
Total Wetland Impact (Acre)						0.08
Total Impacts (Acre)						0.08
Source: Updated Environmental Boundaries Report (Dated 03/21/2023). *Units measured in acres. Identification of features has not been reviewed by regulatory agencies and determinations of stream type could possibly be changed. Predicted impacts are considered "preliminary" and will not be completely accurate until the time of permit application.						

Mitigation of impacts to streams or any other fluvial systems will be accomplished through the avoidance and minimization of potential impacts during the design process. Permanent stream alterations such as relocations, impoundments or channel modification will be mitigated on-site to the extent possible in order to return the channel to its most probable natural state. Impacts that cannot be mitigated on-site will be subject to a compensatory mitigation plan that may include restoration of a comparable resource or application of an in-lieu fee program.

Protected Species

Are the GPNEA between TDOT and USFWS (2022) and MOA between TDOT and TDEC-DNA (2023) applicable to this project?

No

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

Coordination with the U.S. Fish and Wildlife Service (USFWS) was completed on 08/01/2022.

The USFWS provided the following response in an email dated 08/01/2022:

"Thank you for your correspondence regarding the proposed State Route 222 reconstruction and widening from near Hebron Road to near Keeling Road in Fayette and Haywood counties, Tennessee. The project would also include construction at the Interstate 40 Interchange. You are requesting a list of federally threatened or endangered species that may be present in the project area.

Our database does not indicate the presence of any federally listed or proposed species or designated critical habitat 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. Obligations under Section 7 of the ESA should be reconsidered if (1) new information reveals impacts of the proposed action that may affect listed species or critical habitat in a manner not previously considered, (2) the proposed action is subsequently modified to include activities which were not considered during this consultation, or (3) new species are listed or critical habitat designated that might be affected by the proposed action.

TDOT would implement standard construction BMPs to ensure work is separated from flowing waters and that project-related contaminants are kept out of the area streams. Equipment staging and maintenance areas should be developed an adequate distance away to avoid entry of petroleum-based pollutants into the water."

Refer to Appendix C for a copy of the USFWS email coordination dated 08/01/2022.

Tennessee Wildlife Resources Agency (TWRA):

Coordination with Tennessee Wildlife Resources Agency (TWRA) was completed on 08/04/2022.

The TWRA provided the following response in an email dated 08/04/2022:

"The Tennessee Wildlife Resources Agency has reviewed the information that you provided regarding the proposed widening of SR-222 in Fayette and Haywood County, Tennessee and we have no concerns regarding the project and do not anticipate adverse impacts to state listed species under our authority due to the project. Thank you for the opportunity to review and comment, please contact me if you need further assistance."

Refer to Appendix C for a copy of the TWRA email response dated 08/04/2022.

Tennessee Department of Environment and Conservation (TDEC):

Coordination with Tennessee Department of Environment and Conservation - Division of Natural Areas (TDEC DNA) was completed on 08/19/2022.

The TDEC DNA provided the following response in a letter dated 08/19/2022:

"Thank you for your correspondence on 11 July 2022 requesting a rare species database review for the proposed expansion of SR-222 in Fayette and Haywood Counties, Tennessee.

Per your submittal:

TDOT plans to reconstruct and widen SR-222 in Haywood and Fayette counties.

We have reviewed the state's natural heritage database with regard to the project boundaries, and we find that no rare species have been observed previously within one mile of the project area.

Within four miles of the project area the following rare species have been reported .[See Table 4]

The Division of Natural Areas - Natural Heritage Program has reviewed the location of the proposed project workspace with respect to rare plant species. Based on the habitat within the project area, we do not anticipate any impacts to occurrences of rare, threatened, or endangered plant species from this project.

We ask that you coordinate this project with the Tennessee Wildlife Resources Agency contact assigned to your agency to ensure that legal requirements for protection of state listed rare animals are addressed. Additionally, we ask that you contact the U.S. Fish and Wildlife Service Field Office, Cookeville, Tennessee (931-525-4970) for comments regarding federally listed species. Please ensure that best management practices to address erosion and sediment are implemented and maintained during construction activities. Note that the General Aquatic Resource Alteration Permit states that "use of monofilament-type erosion control netting or blanket is prohibited in the stream channel, stream banks, or any disturbed riparian areas within 30 feet of top of bank." Where necessary and feasible, we encourage use of biodegradable netting under the CGP (Construction General Stormwater Permit) as well."

Refer to Appendix C for a copy of the TDEC DNA's letter dated 04/03/2023.

Table 4: Rare Species List							
Type	Scientific Name	Species	Global Rank	State Rank	Federal Protection	State Protection	Habitat
Vascular Plant	<i>Agalinis heterophylla</i>	Prairie False - foxglove	G4G5	S1	--	E	Barrens
Vascular Plant	<i>Carex reniformis</i>	Reniform Sedge	G4	S1	--	S	Rich Bottomland Woods
Acronyms: G4= apparently secure, G5 = Secure, S1= critically imperiled within the state, E=endangered, S= scarce. Source: Updated Environmental Boundaries Report (Dated 03/21/2023).							

TDOT Ecology Section Coordination:

The TDOT Ecology Section provided the following ESR response on 03/21/2023:

"An updated Environmental Boundaries Report dated March 21, 2023 covering the February 16, 2023 ETSA is available on Filenet. The revised impact table is attached."

Refer to Appendix C for a copy of the TDOT Ecology Section's ESR response dated 03/21/2023.

Floodplain Management

Flood Zone: Zone X (White) - Area Determined to be Outside the 500-year Floodplain.

The project is not in a Federal Emergency Management Agency (FEMA) floodway, floodplain, or study area. Within the limits of the ETSA of the Build Alternative, the following FEMA Flood Insurance Rate Maps (FIRMs) have been identified:

- Panel 310 of 400 on Map Number 47075C0310D; and
- Panel 320 of 400 on Map Number 47075C0320D in Haywood County.

Refer to Appendix D for copies of the FEMA FIRMs.

Air Quality

Transportation Conformity:

The TDOT Air Quality and Noise Section provided the following ESR response on 02/21/2023:

"This project is in Haywood County which is in attainment for all regulated transportation-related criteria pollutants. Therefore, conformity does not apply to this project."

Mobile Source Air Toxics (MSATs):

In addition, the TDOT Air Quality and Noise Section stated that: *"This project qualifies as a categorical exclusion under 23 CFR 771.117 and does not require a Mobile Source Air Toxics (MSATs) evaluation per FHWA's "Interim Guidance Update on Air Toxic Analysis in NEPA Documents" dated January 2023."*

Refer to Appendix E for a copy of the TDOT Air Quality and Noise Section's ESR response, dated 02/21/2023, and TDOT's MSAT Guidance Memorandum (January 2023).

Noise

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

The TDOT Air Quality and Noise Section provided the following ESR response on 02/21/2023:

"A recent SR-222 widening project conceptual layout proposes the addition of travel lanes and is therefore a Type I project in accordance with the Federal Highway Administration (FHWA) noise regulation, Procedures for Abatement of Highway Traffic and Construction Noise, 23 CFR 772. However, a review of the current project plans and land use indicates that there are no noise-sensitive land uses in the project area. Therefore, no impacts are anticipated, and a noise study is not required."

Refer to Appendix E for a copy of the TDOT Air Quality and Noise Section's ESR response dated 02/21/2023.

Farmland

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

Yes

FPPA Exemption: Not Applicable

Section 4(f)

Does this project involve the use of property protected by Section 4(f) (49 USC 303)?

No

Section 4(f) is not applicable for the proposed project as it is not anticipated to receive federal funds at this time.

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 PA between TDOT and the SHPO (2021) 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 03/13/2023.

A Phase I Archaeological Assessment was prepared for the proposed project in November 2022. As part of the 2022 Phase I Archaeological Assessment, archaeologists conducted a field survey, shovel tests, and a desktop review of the area of potential effect (APE). Two previously reviewed archaeological sites (Sites 40HD134 and 40HD184), and one new archaeological site (Site 40HD185), were identified within the APE. Sites 40HD134 and 40HD185 were subsequently found to be ineligible for the National Register of Historic Places (NRHP) due to destruction of the site and lack of site integrity, respectively. Site 40HD184 was determined to be ineligible for listing on the NRHP as part of an archaeological study that was completed for a separate TDOT project (Interstate 40/SR-194 (Project Blue Oval) (PIN 132132.01)) and was not re-reviewed as part of the 2022 Phase I Archaeological Assessment.

Following the completion of the 2022 Phase I Archaeological Assessment, an Addendum Phase I Archaeological Assessment⁴ was prepared in February 2023. As part of the 2023 Addendum Phase I Archaeological Assessment, field surveys were completed between 02/06/2023 and 02/07/2023, which included shovel testing, subsurface excavation, and a visual inspection. No additional archaeological sites were identified within the APE.

⁴Please note that a previous ETSA (Dated 09/29/2022) for the proposed project served as the focus of the November 2022 Phase I Archaeological Assessment. The ETSA was subsequently revised on 02/16/2023 to include additional areas not previously reviewed during the November 2022 Phase I Archaeological Assessment.

Subsequently, the TN-SHPO reviewed the 2022 Phase I Archaeological Assessment and the 2023 Addendum Phase I Archaeological Assessment and provided the following response in a letter dated 03/13/2023:

"Considering the information provided, we find that no archaeological resources eligible for listing in the National Register of Historic Places will be affected by this undertaking."

Further, the TDOT Cultural Resources (Archaeology) Section provided the following ESR response on 03/14/2023:

"Based on conceptual plans showing an environmental technical study area dated 2/16/23, the TN-SHPO concurred on 3/13/23 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."

Refer to Appendix F for a copy of the 2022 Phase I Archaeological Assessment, TN-SHPO letter dated 03/13/2023, and the TDOT Cultural Resources (Archaeology) Section's ESR response dated 03/14/2023.

Historic/Architectural Concurrence:

Concurrence from the TN-SHPO was received on 04/03/2023.

A Historic Architecture Survey was prepared for the proposed project in March 2023. As part of the March 2023 Historic Architecture Survey, historians conducted a field survey as well as a desktop review in order to identify any potential historic resources within the APE. Nine architectural resources, four of which were previously identified by the TN-SHPO, were identified within the limits of the APE. Of particular interest, the Oak Hill Farm was identified within the APE of the proposed project and evaluated for the NRHP; however, due to the limited integrity of the buildings on the property, the Oak Hill Farm, was not recommended by TDOT as eligible for listing on the NRHP. None of the aforementioned nine historical resources were determined by TDOT to be eligible for listing on the NRHP.

Subsequently, the TN-SHPO reviewed the 2023 Historic Architectural Survey and provided the following response in a letter dated 04/03/2023:

"Considering the information provided, we concur that the Oak Hill Farm is not eligible due to insufficient integrity (loss of buildings). We further concur that no architectural resources eligible for listing in the National Register of Historic Places will be affected by this undertaking."

The revised consultant report mentions connector roads as part of the Blue Oval Megasite project. Please confirm that these have already been reviewed or will be reviewed for Section 106 compliance. In the future, the cover letter should state if the undertaking has been revised since the last submission and provide detail on the revised scope of work. The consultant report shows that the project has been shortened from 3.81 miles to 2.04 miles, but the cover letter only states that the project is 2.04 miles with no explanation that this was revised from the initial submission."

TDOT subsequently confirmed with the TN-SHPO in an email dated 04/04/2023 that the aforementioned connector roads were previously studied as part of a separate TDOT project (Interstate 40/SR-194 (Project Blue Oval) (PIN 132132.01)). Therefore, no further action is required.

Furthermore, the TDOT Cultural Resources (Historic Preservation) Section provided the following ESR response on 04/04/2023:

"In a letter dated 04/03/2023, the TN-SHPO concurred that there are no architectural resources eligible for listing in the National Register of Historic Places that would be affected by the proposed project."

Refer to Appendix F for a copy of the 2023 Historic Architecture Survey, TN-SHPO letter dated 04/03/2023, TDOT email coordination dated 04/04/2023, and the TDOT Cultural Resources (Historic Preservation) Section's ESR response dated 04/04/2023.

Native American Consultation

Does this project require Native American consultation?	No
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The TDOT Cultural Resources (NAC) Section provided the following ESR response on 02/23/2023:

"The proposed project is currently not an FHWA Undertaking as defined in 36 CFR 800.16(y). As such, Section 106 review for Native American Coordination is not required. If the scope of the project changes, additional review and coordination may be required."

Refer to Appendix F for a copy of the TDOT Cultural Resources (NAC) Section's ESR response dated 02/23/2023.

Environmental Justice

Are there any disproportionately high or adverse effects on low-income or minority populations?	No
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For the purposes of the TEER, an EJ analysis was completed utilizing the U.S. Census Bureau's 2017-2021 American Community Survey (ACS) 5-Year Estimates data. This analysis was completed to identify the census block groups within the limits of the ETSA of the Build Alternative and determine whether the minority and/or low-income populations present within the census block groups are considered to contain EJ populations. The analysis identified the following two census block groups within the ETSA of the Build Alternative:

- Census Tract (CT) 9305 Block Group (BG) 2 and BG 3

TDOT has developed two threshold indicators to identify and report minority and low-income populations (EJ populations) present within a project area. The TDOT thresholds include:

1. The minority and/or low-income population percentage for a given census block group exceeds the county minority and/or low-income population average by 10 percentage points or more; and/or
2. The minority and/or low-income population exceeds 50 percent of the overall census block group population.

Table 5: Environmental Justice Population Analysis			
Minority Populations			
Census Tract (CT) Block Group (BG)	CT 9305 BG 2	CT 9305 BG 3	Haywood County
Total Population	1,044	804	17,912
Total Minority Population	682	597	10,125
% Minority/Non-White	65.3%	74.3%	56.5%
Exceeds County % by 10 Percentage Points or More	No	Yes	N/A
Exceeds 50% of Block Group Population	Yes	Yes	N/A
Meet EJ Criteria?	Yes	Yes	N/A
Low-Income Populations			
Census Tract (CT) Block Group (BG)	CT 9305 BG 2	CT 9305 BG 3	Haywood County
Total Population	1,044	804	17,683
Total Low-Income Population	189	36	3,662
% Low-Income/Below Poverty Line	18.1%	4.5%	20.7%
Exceeds County % by 10 Percentage Points or More	No	No	N/A
Exceeds 50% of Block Group Population	No	No	N/A
Meet EJ Criteria?	No	No	N/A
N/A = Not Applicable Source: U.S. Census Bureau, 2017-2021 American Community Survey (ACS) 5-Year Estimates. ACS data was accessed and reviewed on 04/03/2023 via the U.S. Census Bureau website.			

Minority Populations:

As shown in Table 5, the 2017-2021 ACS 5-Year Estimates data shows that the minority population for Haywood County is 56.5 percent of the population. Additionally, the minority populations range from 65.3 (CT 9305, BG 2) to 74.3 percent (CT 9305, BG 3) within the limits of the ETSA of the Build Alternative.

Based on this EJ analysis, both of the census block groups identified contain minority population percentages that exceed the Haywood County minority population average by 10 percentage points or more. Additionally, both of the census block groups identified contain minority population percentages that account for more than 50 percent of the overall population of their respective census block group. Therefore, the minority populations within the limits of the ETSA of the Build Alternative are considered EJ populations.

Low-Income Populations:

As shown in Table 5, the 2017-2021 ACS 5-Year Estimates data shows that the low-income population for Haywood County is 20.7 percent of the population. Additionally, the low-income populations range from 4.5 percent (CT 9305, BG 2) to 18.1 percent (CT 9305, BG 3) within the limits of the ETSA of the Build Alternative.

Based on this EJ analysis, none of the census block groups identified contain low-income population percentages that exceed the Haywood County low-income population average by 10 percentage points or more. Additionally, none of the census block groups identified contain low-income population percentages that account for more than 50 percent of the overall population of their respective census block group. Therefore, the low-income populations within the limits of the ETSA of the Build Alternative are not considered EJ populations.

Conclusion:

Based on the EJ analysis, TDOT acknowledges that minority and low-income persons are present within the limits of the ETSA of the Build Alternative and that the minority populations present within CT 9305 BG 2 and 3; are considered EJ populations. There may be some adverse impacts from the proposed project, including impacts from construction and other minor environmental impacts; however, there is not a disproportionately high and adverse effect to minority and low-income persons when compared to the impacts borne by all populations in and around the limits of the ETSA of the Build Alternative. No homes or businesses are currently proposed to be displaced by the proposed project. In addition, the minority and low-income persons would receive the benefits resulting from construction of the proposed project, which include improvements the support of economic development and improved roadway geometry consistent with TDOT Design Standards.

Refer to Appendix G for the 2017-2021 ACS 5-Year Estimates Data.

TDOT Civil Rights Division Coordination:

The TDOT Civil Rights Division reviewed TDOT's EJ analysis on 04/18/2023 and provided the following response:

"Actions and steps taken are found to be in accordance with the mandates of Title VI of the 1964 Civil Rights Act, the National Environmental Policy Act 1969, and 42 U.S.C. 4332(2), and Executive Order 12898. There does not appear to be any Title VI nor Environmental Justice issues."

Refer to Appendix G for a copy of the TDOT Civil Rights Division's Coordination letter dated 04/18/2023.

Hazardous Materials

Does the project involve any other hazardous material sites? No

The TDOT Hazardous Materials Section provided the following ESR response on 02/17/2023:

"Based on the Environmental Technical Study Area figure, no known hazardous materials sites affect this project as it is currently planned. 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."

Refer to Appendix H for a copy of the TDOT Hazardous Materials Section's ESR response dated 02/17/2023.

Bicycle and Pedestrian

Does this project include accommodations for bicycles and pedestrians?

No

Policy Exception: Cost of accommodations are excessively disproportional to the need and use.

The TDOT Multimodal Transportation Resources Division provided the following ESR response on 02/24/2023:

"At this time, cost of the proposed shared-use path is excessive. ROW is reserved for shared-use path to reach Stanton along this route and SR-468."

Refer to Appendix I for a copy of the TDOT Multimodal Transportation Resources Division's ESR response dated 02/24/2023.

Environmental Commitments

Does this project involve any environmental commitments?

No

Additional Environmental Issues

Are there any additional environmental concerns involved with this project?

No

Conclusion

Review Determination

Determination: Tennessee Environmental Evaluation Report

This state-funded highway project qualifies for an environmental evaluation under the Tennessee Department of Transportation's current environmental procedures. The Department has determined that this project will not limit reasonable alternatives for federal-aid projects, that no federal agencies have significant influence over the outcome of the project, and that no significant environmental impacts will result from this action. This determination does not require Administration approval and has been documented in a Tennessee Environmental Evaluation Report.

Reference Material

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

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 attachments and technical appendices.

Hope Weaver Digitally signed by Hope Weaver
Date: 2023.04.18 16:54:44
-05'00'

Document Preparer

Document Approval

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 attachments and technical appendices.

Tennessee Department of Transportation

Attachments

Acronyms

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

List of Appendices

Appendix A: Design Plans

Appendix B: TDOT Right-of-Way Coordination

Appendix C: Ecology

Appendix D: Floodplains

Appendix E: Air Quality and Noise

Appendix F: Cultural Resources and Section 106 Coordination

Appendix G: Environmental Justice

Appendix H: Hazardous Materials

Appendix I: Multimodal