

# C-List Categorical Exclusion

Does the action described in this "c-list" Categorical Exclusion (CE) exceed one or more of the thresholds described in the PCE Agreement, thereby requiring review and approval by the Federal Highway Administration (FHWA)?  No

Interstate 24

Bridge over Shellmound Road

Marion County

PIN 130900.00

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

## Document Approval

By signing below, the authorized signatory concurs that this document is in compliance with all applicable environmental laws, regulations and procedures. The authorized signatory has 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.

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Tennessee Department of Transportation

# Environmental Commitments

Owner	Commitment
Ecology	All tree clearing activities will take place between November 16th and March 31st.

# Project Information

## General Information

**Route:** Interstate 24  
**Termini:** Bridge over Shellmound Road  
**Municipality:**  
**County:** Marion County  
**PIN:** 130900.00

**Plans:** Line and Grade Plans

**Date of Plans:** 05/15/2025

**Type of Work:** Bridge Replacement

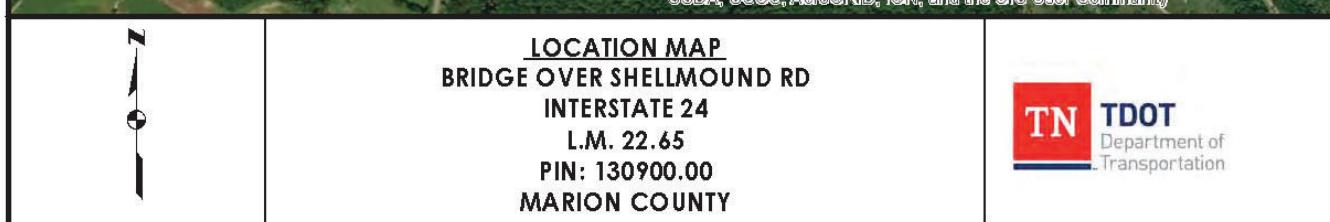
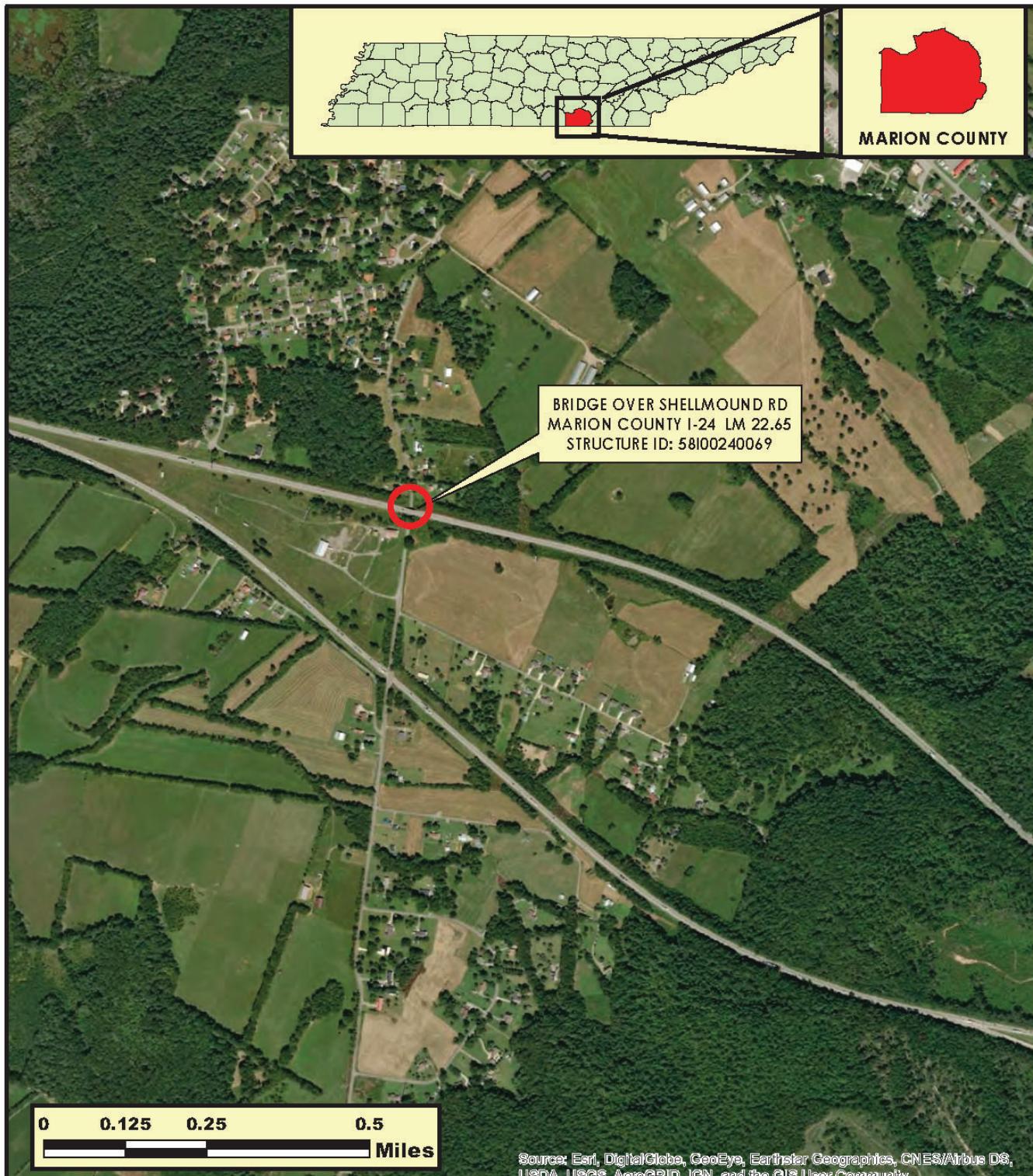
## Project Funding

**Planning Area:** Southeast Rural Planning Organization (RPO)

**STIP/TIP:** 23000000076 - National Highway System Preservation and Operation - Rural Grouping

Funding Source	Preliminary Engineering	Right-of-Way	Construction
<b>Federal</b>	BR-I-24-2(183)	N/A	N/A
<b>State</b>	PE-N: 58100-0186-44 PE-D: 58100-1186-04	58100-2186-04	58100-3186-04

# Project Location



# Project Overview

## Introduction

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA), proposes to replace the Interstate 24 bridge over Shellmound Rd (Bridge ID#: 58I00240069), at log mile (LM) 22.65 in Marion County, Tennessee.

This federal-aid highway project has been determined to be a "C-List" CE pursuant to 23 CFR 771.117(c) (28), "Bridge rehabilitation, reconstruction, or replacement or the construction of grade separation to replace existing at-grade railroad crossings, if the action meets the constraints in paragraph (e) of this section." The project meets the constraints of 23 CFR 771.117(e).

## Background

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 the Federal Highway Administration (FHWA) 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." 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 zero 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 which 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 zero being a closed bridge and 9 being superior to present desirable criteria.

The most recent NBI Report, dated 03/11/2024, shows the following condition and appraisal ratings:

**Table 1. NBI Ratings for the I-24 bridge over Shellmound Road (Bridge ID#: 58I00240069)**

<b>Bridge ID#: 58I00240069</b>			
<b>Condition Ratings</b>	<b>Number</b>	<b>Rating</b>	<b>Description</b>
<b>Deck</b>	7	Good	some minor problems
<b>Superstructure</b>	5	Fair	all primary structural elements are sound but may have minor section loss, cracking, spalling or scour
<b>Substructure</b>	7	Good	some minor problems
<b>Stream Channel and Channel Protection</b>	N/A		
<b>Appraisal Ratings</b>	<b>Number</b>	<b>Description</b>	
<b>Structural Evaluation</b>	5		Somewhat better than minimum adequacy to tolerate being left in place as is
<b>Deck Geometry</b>	8		Equal to present desirable to criteria
<b>Underclearance Rating</b>	5		Somewhat better than minimum adequacy to tolerate being left in place as is
<b>Approach Roadway Alignment</b>	8		Equal to present desirable to criteria

The Bridge Inspection Report (dated 07/16/2024) provided an overall condition rating of "2-Fair." The bridge was constructed in 1965 and has not been rehabilitated. The structure has reached 60 years of service life. In addition, the Concept Report (02/07/2023) notes that the existing typical section of the bridge does not meet current TDOT designed standards.

The Concept Report, NBI Report, and Bridge Inspection Report are included in the Technical Appendices. Line & Grade Plans (dated 05/15/2025) have been developed, are included in the Technical Appendices, and serve as the focus of this environmental evaluation.

# Project Development

## Need

The proposed project is needed to address the insufficient structural elements of the subject bridge, as indicated by the superstructure condition rating of 5, the structural evaluation and underclearance appraisal ratings of 5, and the current age of the bridge (60 years). In addition, as noted in the Concept Report (02/07/2023), the existing typical section of the bridge does not meet current TDOT design standards.

## Purpose

The purpose of the proposed project is to address the insufficient structural elements and to bring the bridge up to 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

# Project Design

## Existing Conditions and Layout

According to the NBI Report (03/11/2024), the Enhanced Tennessee Roadway Information Management System (E-TRIMS), and the Concept Report (02/07/2023), the existing I-24 bridge over Shellmound Road consists of two, 12-ft WB travel lanes and 6-ft shoulders. The structure is 106-ft long with three spans and the span across Shellmound Rd is 42-ft wide. The out-to-out width of the bridge is 40-ft 5-inches and it is a concrete structure with a concrete cast-in-place deck. Within the project area, I-24 is classified as a rural interstate.

## Proposed Project Description

The proposed project is being developed through the TDOT Alternative Delivery Division. As indicated in the Concept Report (02/07/2023) and the Line & Grade Plans (05/15/2025), the proposed replacement structure would be a 140-ft long concrete beam bridge with three spans. The middle span over Shellmound Rd would be 60-ft long. The proposed grade of the bridge would be raised approximately 3-inches to increase the bridge clearance to 16-ft 6-inches. The typical section of the proposed bridge would consist of two 12-ft wide travel lanes, with a 24-ft inside shoulder and 12-ft outside shoulder to accommodate a future travel lane, and concrete parapets. The proposed out-to-out width would be 61-ft 3-inches. The roadway centerline will be shifted 18-ft south and the structure centerline would be shifted 24-ft south to accommodate the wider proposed shoulders.

## 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	Slope Easements	Air Rights	Total	Construction Easements	Total
0	0	0	0	0	0.194	0.194

\*Measured in acres

## Relocations

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

No

## Changes in Access Control

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

No

## Traffic Control Measures

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

No

Detailed traffic control plans are not available at this time. However, the Concept Report and Line & Grade Plans both indicate that the proposed project would use phased construction. Two 11-ft travel lanes with 2-ft shoulders would be maintained throughout construction.

# Environmental Studies

## Water Resources

Are there any water resources impacted within the project area?

Yes

As summarized in the Environmental Boundaries Report (EBR) dated 7/1/2025, one stream, two wet weather conveyances, one pond, and three wetlands were identified within the proposed project area:

Project Name: Marion Co., I-24 LM 1.29 to LM 1.40 Bridge Replacement

PIN: 130900.00

### Water Resource Table for NEPA Documentation

Based on: ETSA

Date: 8/22/2024

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

Water Resources (Non-Wetland)									
Label	Type	Latitude	Longitude	Receiving Waters		USACE Jurisdiction	Quality	Amount (Linear Feet)	Amount (Acres)
WWC-1	Wet Weather Conveyance	35.045365	-85.608231	Sequatchie River		No	Unassessed	188	0.012
PND-1	Pond	35.043135	-85.603127	Sequatchie River		No	Not Applicable	25	0.001
WWC-2	Wet Weather Conveyance	35.043083	-85.602997	Sequatchie River		No	Unassessed	105	0.003
STR-1	Intermittent Stream	35.043711	-85.601827	Sequatchie River		Yes	Unassessed	1,200	0.088
							Total:	1,518	0.104

### Water Resources (Wetland)\*

Label	Type	Latitude	Longitude	Receiving Waters	TDEC Jurisdiction	USACE Jurisdiction	Quality	Amount (Acres)
WTL-1	Emergent	35.602997	-85.043083	Sequatchie River	Non-Isolated	Yes	Low Resource Value	0.006
WTL-2	Emergent	35.043860	-85.602522	Sequatchie River	Isolated	No	Low Resource Value	0.022
WTL-3	Emergent	35.044029	-85.603485	Sequatchie River	Isolated	No	Low Resource Value	0.064
						Total:**		0.092

\*Unless described otherwise in the NEPA document; all wetlands are presumed to serve the following functions to varying degrees, based on location: wildlife habitat, flood storage, groundwater recharge, nutrient processing, contaminant filtering, and recreation.

\*\*For the purposes of the NEPA document, Amount is assumed to be Permanent Loss.

*Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.*

## Species Coordination

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

The TDOT Ecology Section requested to coordinate with USFWS for this project on 06/09/2025 stating, "Based on...the proposed project being located in the winter buffer for the federally endangered Indiana bat (*Myotis sodalis*) and the proposed federally endangered tricolored bat (*Perimyotis subflavus*), TDOT has committed to perform all tree clearing activities in the timeframe of November 16th through March 31st. In adherence to the proposed scope of work, and the aforementioned tree clearing commitment, TDOT concludes the subject project will "not likely adversely affect" the federally endangered Indiana bat (*Myotis sodalis*) or the proposed federally endangered

tricolored bat (*Perimyotis subflavus*)."

On 06/27/2025, the USFWS responded to TDOT's request for coordination, stating: "The Service concurs with your effect determination(s) for resources protected by the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.). This finding fulfills the requirements of the Act."

As a result of this coordination, an environmental commitment was added to the project: "All tree clearing activities will take place between November 16th and March 31st."

Coordination with USFWS is included in the Technical Appendices as part of the EBR.

#### **Tennessee Wildlife Resources Agency (TWRA):**

On 10/15/2024, the TWRA responded to TDOT's request for coordination, stating: "Our databases show documented occurrences of multiple state listed species within 4.0 miles for the project location however, based on the scope of work and location of the project our agency does not anticipate significant adverse impacts to these species provided that all applicable TDEC and US EPA approved Erosion Prevention/Silt Control measures and Best Management Practices be planned for, implemented, monitored, and maintained throughout construction."

Coordination with TWRA is included in the Technical Appendices as part of the EBR.

#### **Tennessee Department of Environment and Conservation (TDEC):**

The EBR states: "TDOT ecology has determined that the subject project meets condition (1) of the TDEC DNA MOA."

The 2023 TDEC-DNA MOA is included in the Technical Appendices.

On 07/10/2025, the TDOT Ecology Section stated: "Based on the information provided, an environmental boundaries report dated 7/1/2025 has been completed and uploaded to FileNet for the subject project. Species coordination was completed with TWRA and USFWS for the project, and the coordination documents are included within the EBR and with this response. The project was deemed to fit Condition 1 of the TDEC DNA MOA. Species coordination for this project is based on current understanding of the project scope, any changes to which could lead to additional coordination being required."

The ESR response is included in the Technical Appendices.

## **Floodplain Management**

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**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, and is located on Flood Insurance Rate Map (FIRM) in Marion County, Panel 250 of 425, Map # 47115C0250D. A portion of the FEMA FIRM is included as an attachment.

## Air Quality

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### Transportation Conformity:

On 05/30/2025, the TDOT Air Quality and Noise Section stated: "This project is in Marion County which is in attainment for all regulated criteria pollutants. Therefore, conformity does not apply to this project."

### Mobile Source Air Toxics (MSAT):

In their 05/30/2025 response, the TDOT Air Quality and Noise Section stated: "This project qualifies as a categorical exclusion under 23 CFR 771.117 and, therefore, does not require an evaluation of MSATs per FHWA's "Interim Guidance Update on Air Toxic Analysis in NEPA Documents" dated January 2023."

The ESR response is included in the Technical Appendices.

## Noise

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

This project is Type III in accordance with the FHWA noise regulation in 23 CFR 772 and TDOT's noise policy; therefore, a noise study is not needed.

## Farmland

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

**FPPA Exemption:** Small Acreage (10 acres or less per linear mile)

## Section 4(f)

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

## Section 6(f)

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

## Cultural Resources

Are any Agreements/Exemptions regarding Cultural Resources applicable to this project?

No

Are NRHP listed or eligible cultural resources within the project Area of Potential Effect (APE)?

No

### Historic/Architectural Concurrence:

Concurrence from the TN State Historic Preservation Office (TN-SHPO) was received on 03/19/2025

In their response, the TN-SHPO stated: "Considering the information provided, we concur that no architectural resources eligible for listing in the National Register of Historic Places will be affected by this undertaking."

### Archaeology Concurrence:

Concurrence from the TN State Historic Preservation Office (TN-SHPO) was received on 03/27/2025.

In their response, the TN-SHPO stated: "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."

The TN-SHPO letters, ESR responses, Historic/Architecture Assessment, and Archaeological Assessment are included in the Technical Appendices.

## Native American Consultation

Does this project require Native American consultation?

Yes

Native American Consultation was requested on 01/30/2025.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	Poarch Band of Creek Indians
<input type="checkbox"/>	<input type="checkbox"/>	Chickasaw Nation	<input type="checkbox"/>	<input type="checkbox"/>	Quapaw Nation
<input type="checkbox"/>	<input type="checkbox"/>	Choctaw Nation of Oklahoma	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Shawnee Tribe
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Eastern Band of Cherokee Indians	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Thlophlocco 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"/>	Jena Band of Choctaw Indians
<input type="checkbox"/>	<input type="checkbox"/>	Other	<input type="checkbox"/>	<input type="checkbox"/>	Other

The TDOT Native American Consultation ESR response (dated 06/14/2025) states: "An invitation to participate in the Section 106 process was sent on January 30, 2025 to all federally recognized Native American tribes with interests in the subject county: Absentee-Shawnee Tribe of Indians in Oklahoma, Cherokee Nation, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Kialegee Tribal Town, Poarch Band of Creeks, Shawnee Tribe, The Muscogee (Creek) Nation, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma.

"On February 19, 2025, the Shawnee Tribe responded and concurred that no known properties of significance will be negatively impacted by this project. The Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

"On March 26, 2025, the Eastern Shawnee Tribe responded with a finding of "no adverse effect." The Eastern Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding. To date, no other responses have been received.

"In accordance with Section 106 regulations, tribes must be provided a reasonable opportunity to comment on the proposed undertaking. TDOT Cultural Resources staff will document all additional requests for information, comments, or additional communications with recognized tribes on this undertaking. TDOT will re-initiate consultation if additional cultural resources studies are required or if archaeological materials or human remains are discovered during construction."

The ESR response is included in the Technical Appendices. All NAC coordination is on file with the TDOT Cultural Resources Section.

## Hazardous Materials

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

Yes

On 06/02/2025, the TDOT Hazardous Materials Section stated: "Based on the Line and Grade Plans dated 15 May 2025, no known hazardous materials sites affect this project as it is currently planned, and no additional hazardous material studies are recommended at this time."

The ESR response is included in the Technical Appendices.

## Multimodal Transportation

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Does this project include accommodations for bicycles and pedestrians?

Yes

On 08/01/2025, the TDOT Office of Active Transportation confirmed that the proposed project meets the 2015 Multimodal Policy exception VII(B)(3): "Areas in which the population and employment densities or level of transit service around the facility, both existing and future, does not justify the incorporation of multimodal alternatives."

Although the proposed bridge replacement is along a controlled access facility, the bridge crosses over a local road, Shellmound Road. As noted in the Concept Report (02/07/2023), the proposed replacement structure would feature a 60-ft span across Shellmound Road (wider than the existing 42-ft span), which will better accommodate pedestrian and bicycle traffic traveling on the shoulder of the local road.

The ESR response and the 2015 Multimodal Policy are included in the Technical Appendices.

## Environmental Commitments

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Does this project involve any environmental commitments?

Yes

## Additional Environmental Issues

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Are there any additional environmental concerns involved with this project?

No

# Conclusion

## Review Determination

### Determination: (c)(28) - meets (e)

This federal-aid highway project has been determined to be a “C-List” CE pursuant to 23 CFR 771.117(c)(28), “Bridge rehabilitation, reconstruction, or replacement or the construction of grade separation to replace existing at-grade railroad crossings, if the action meets the constraints in paragraph (e) of this section.” The project does meet the constraints of 23 CFR 771.117(e).

## 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 technical appendices.

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Document Preparer