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Date: December 9, 2013

To: Leigh Ann Tribble, Environmental Program Engineer, FHWA

From: Ann Andrews, NEPA Documentation Manager **Ann Andrews**

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Subject: Request for NEPA document level determination
I-75 at I-24 Interchange
Chattanooga, Hamilton County, TN
PIN 114174.00

The City of Chattanooga is in the process of entering into an agreement with the Tennessee Department of Transportation (TDOT) Local Programs Office to receive federal funding assistance for the proposed project to modify the existing I-75 at I-24 interchange. The total roadway length is of approximately 4.4 miles. The project also includes the modification to the circulation patterns of the existing rest area along the I-75 north-bound lanes. Attached are a project location map and a graphic depicting the concept for the improvement. Also attached are the concept plans which show approximately 13.05 acres of additional right-of-way that will be required for this project.

Background

TDOT has been studying the modification of the existing I-24 and I-75 interchange in south Chattanooga for a number of years. This project has been studied in the two reports described below:

1. *Interstate Access Request, Interstate 75 at Interstate 24, Hamilton County, Tennessee.* June 2012. Prepared by Palmer Engineering for TDOT.
2. *Interchange Modification Study, Interstate 75 @ Interstate 24 Directional Interchange Area, Chattanooga, Hamilton County, Tennessee.* May 2002. Prepared by PBS&J for TDOT.

The existing project area is along the I-24 and I-75 corridors. The Interstate 24 project area is primarily a six (6) lane, controlled-access facility that is separated by a concrete barrier wall and has a right-of-way width of approximately 500 feet. The Interstate 75 project area is primarily an eight (8) lane, controlled-access facility that is separated by a

concrete barrier wall. The right-of-way along I-75 varies from approximately 300 to 600 feet in width and, as mentioned earlier, approximately 13.05 acres of additional right-of-way will be required for this project (see Concept Plans).

Approximately 1.1 miles to the west of the I-75/I-24 interchange is the western project terminus at I-24/South Moore Road interchange. Approximately 2.2 miles to the east of the I-75/I-24 interchange is the eastern project terminus at I-75/East Brainerd Road interchange. The southern project terminus is located approximately 1.1 miles south of the I-75/I-24 interchange at the I-75/Ringgold Road interchange. The Tennessee Welcome Center is located along I-75 north bound between the Ringgold Road and I-75/I-24 interchange and is within the project area.

The project area is a mix of residential, commercial, recreational and undeveloped properties. The eastern portion of the project area is primarily encompassed by the Brown Acres Golf Course, Camp Jordan and commercial development.

The 2012 Interstate Access Request presented the purpose and need for the proposed project, which is to decrease congestion, improve substandard ramp geometry, improve safety, increase capacity and improve traffic operations. Additionally, the improved circulation patterns of the existing rest area to eliminate weaving conditions along north bound I-75 will improve traffic flow and increase safety in the area. Modifications are needed to provide a safer facility for roadway users due to high crash rates and truck rollovers throughout the I-75/I-24 interchange.

Beyond the purpose and need, the planning reports contained traffic analysis, cursory environmental screening and concepts developed for the improvement. The 2012 report explored seven (7) alternatives. The report recommended Alternative 7 as the selected alternative as it meets the purpose and need and has the least environmental impacts. Alternative 7 lessens the right-of-way acquisition, avoids the Camp Jordan Park conservation easement, eliminates the weaving condition at the rest area, and performs well from a traffic standpoint. Concept Plans show approximately 13.05 acres of additional right-of-way will be required for this project.

Potential Environmental Impacts

A project area field review was conducted on August 28, 2013. Those attending included Ann Andrews, Bob Allen, Wesley Hughen, Chester Sutherland, Sandy Layne-Sclafani and Drew Gaskins. Based on the field review, review of the two planning reports, the project concept on an aerial photograph and state/federal database searches, the project's potential environmental impacts are summarized below.

Air Quality: Hamilton County is one of several other counties in Tennessee that is designated as not in attainment for PM 2.5. Modifications to the interstate must conform to standards and not produce air quality violations.

Noise: This is a roadway widening; therefore, traffic already travels the roadways within the project area. Noise impacts are unknown and will need to be determined.

Ecology: Located within the project limits are the Chickamauga and Spring Creeks. These both currently have interstate crossings. The I-75 Bridge is proposed to be widened over Chickamauga Creek. Northeast and southeast of the I-75 Bridge is the

Brown Acres Golf Course; southwest of the bridge is undeveloped property; and northwest of the bridge is commercial property.

Spring Creek, a tributary to W. Chickamauga Creek, is currently crossed by two I-75 bridges. This pair of bridges is proposed to be widened over Spring Creek. The area around the bridges is undeveloped with Camp Jordan conservation easement to the east.

The National Wetland Inventory Mapper identifies potential wetlands southeast and southwest of the I-75/I-24 interchange. The proposed project is not anticipated to encroach on these wetland areas.

A review of the TDEC database for threatened, endangered and deemed in need of management species within the Spring Creek, West Chickamauga Creek and Lower South Chickamauga Creek watersheds was conducted. Within the project area, the database lists five bird species, four fish species, three mammal species, two crustacean species, thirteen flowering plant species and one mollusk species. Presence of the potential habitat for these species within the project area will be determined during the ecology study. Subsequent surveys for the presence of particular species may be required.

Archaeological: An archaeological study of the project area will need to be conducted.

Historic/Parks: A search of the National Park Service database did not indicate a National Register of Historic Places (NRHP) site within the project area.

Camp Jordan is located to the east of the I-75/I-24 interchange. Camp Jordan is a 257 acre recreation facility with biking and walking trails. Camp Jordan is held in a Conservation Easement. The proposed project is not anticipated to impact the area.

Located both north and south of I-24, east of the I-75/I-24 interchange is Brown Acres Golf Course. It is a City of Chattanooga public golf course that is open year round. This approximately 146 acre facility consists of an 18-hole course, driving range and pro shop. The proposed project is not anticipated to impact the area.

Social/Environmental Justice: The project area to the north of the I-75/I-24 interchange consists primarily of residential and commercial land uses and the area to the southwest consists of primarily residential, commercial and undeveloped properties. The area in the southwest and southeast quadrants near the interchange is in a floodplain and undeveloped. The southeast quadrant contains Camp Jordan Park which is protected from development by a conservation easement.

The four (4) census tracts that encompass the project area were reviewed for percent of residents below poverty level. The tract located north/northwest of the I-75/I-24 interchange is above the Hamilton County rate of 15.9 percent living below poverty level. The project area was also reviewed for percent of minority residents. Census records indicate that of the eight (8) census blocks north of the I-75/I-24 interchange project, seven were higher for minorities than the Hamilton County rate of 24.3 percent. The seven (7) census blocks south of the project area were below the Hamilton County rate. Impacts to the residents in these areas will be evaluated.

Displacements: Displacements are not anticipated for this project.

Hazardous Materials: No EPA National Priorities List (NPL) sites are located within the project area.

Studies that will be undertaken in support of NEPA include:

1. Ecology
2. Air Quality (TDOT coordination for PM 2.5)
3. Noise
4. Historic
5. Archaeology
6. Hazardous Materials
7. Environmental Justice
8. CSRP if warranted

All technical studies will be performed in accordance with the Tennessee Environmental Procedures Manual and, where applicable, individual TDOT technical scopes of work. Portions of the project will encroach into floodplains and will need to be addressed in project design.

These potential issues and overall study of the project's impacts can be adequately addressed in a D-List Categorical Exclusion that is enhanced by:

- Up to two meetings with neighborhood residents and business owners, anticipated to be held at Camp Jordan which is near the southern terminus of the project. The meeting notice will be advertised in the local newspaper.

If you have any questions or need additional information, please contact Bob Allen or me. If you are in agreement that this project should be developed as an D-List Categorical Exclusion with enhanced public participation as described above, please sign below and return a copy to me.

The Division Office concurs that the project may be initiated as a Categorical Exclusion with the understanding that should the significance of the environmental impacts become unclear during the course of document preparation, an Environmental Assessment will have to be prepared in accordance with 23 CFR 771.115.

FHWA hereby concurs with TDOT that the project should be developed as an Enhanced D-List Categorical Exclusion.

12-12-13
Date

Leigh Ann Jubble
FHWA Representative

Attachments: Project Location Map, Preliminary Project Concept, Interchange Modification Study (CD), Interstate Access Request (CD), Concept Plans (CD)