

Reevaluation: Interstate 75 (I-75) at Interstate 24 (I-24) Interchange, From I-24 East of Belvoir Avenue, to I-24/I-75 Interchange and I-75 at the Tennessee-Georgia State Line to I-75, West of East Brainerd Road
Hamilton County, TN
TN-PIN: 114174.00
Date: 07/25/2018
Page EC-1

Environmental Commitments

☒ Commitments are involved on the project.

List of Environmental Commitments

The project will be developed in accordance with the Tennessee Department of Transportation's (TDOT) Standard Specifications for Road and Bridge Construction, which addresses sediment and erosion control and siltation; channelization; floodplains; construction impacts; utility relocation; and traffic maintenance and detours. Best Management Practices (BMPs) will be stringently implemented throughout the construction period.

Ecology: Due to concerns for spawning populations of the federally threatened snail darter (*Percina tanasi*), work is prohibited in Spring Creek, West Chickamauga Creek, and South Chickamauga Creek during the period from February 1 through April 30 during all years of construction.

USFWS; Coordination letter dated 4/18/2016

Prior to any stream work, sweeps and upstream relocation will need to be performed for the State-listed Chickamauga Crayfish (*Cambarus extraneus*).

TWRA; Coordination email dated 6/27/2014

Ecology: To comply with the TDOT/USFWS 2015 Memorandum of Agreement (MOA) for impacts to Cliff Swallows (*Petrochelidon pyrrhonota*) and Barn Swallows (*Hirundo rustica*); cliff swallows and barn swallow nests, eggs, or birds (young and adults) will not be disturbed between April 15 and July 31. From August 1 to April 14, nests may be removed or destroyed, and measures may be implemented to prevent future nest building at the site (e.g. closing off area using netting). TDOT; Environmental Boundaries Report dated 10/25/2017

Ecology: Due to the uncommonly high concentration of rare plant species in the wetlands around the project, TDEC's Division of Natural Areas request to review the project plans to ensure that this project does not adversely impact the rare plant species listed on the Species Form of the Environmental Boundaries Report or their habitats. TDOT will provide TDEC with the project plans. TDEC, Division of Natural Areas; letter dated 10/05/2017.

If impacts to the rare plant species listed on the Species Form of the Environmental Boundaries Report or their habitats are unavoidable, TDEC's Division of Natural Areas requests the plans to include measures to translocate the species to a suitable, highquality mitigation site. TDOT commits to including translocate plans, if needed. TDEC, Division of Natural Areas; letter dated 10/05/2017.

Noise: TDOT will make final determinations regarding the construction of noise barriers using the preliminary plans for the project. TDOT, Air and Noise Technical Section; Noise Technical Report dated 11/2017

Other: The following environmental commitments are being made in regard to the South Chickamauga Creek Greenway and are in compliance with the approved December 2017 Section 4(f) De Minimis Determination:

- A temporary asphalt pavement greenway path will be maintained and placed into service prior to any temporary relocation of the existing greenway within the area either under or immediately adjacent to the I-75 bridge over South Chickamauga Creek. This temporary greenway path will be maintained for the duration of construction until a permanent asphalt greenway path can be constructed near the completion of the project.
- The greenway under I-75 will remain in service during the construction of the bridge over South Chickamauga Creek. Temporary pedestrian overhead protection measures will be used to protect greenway users traversing the work zone. Access to the Brainerd Road and Camp Jordan trailheads, both north and south of the project, will be maintained.
- If it becomes necessary to close the greenway path for any reason during construction of the South Chickamauga Creek bridge, work will be done at night when the greenway is closed.
- While every effort will be made to keep the greenway path open, occasional, temporary closures may be necessary for construction of the bridge. Signage will be posted at strategic locations warning of the closure. Closures will be of limited duration.
- If an event occurs during construction that creates an unsafe situation either under or immediately adjacent to the bridge, the greenway path will be shut-down immediately and the situation will be resolved as quickly as possible so that the greenway path can be reopened.
- Prior to and during construction, notices of potential temporary greenway closures will be posted at Brainerd Road and Camp Jordan Trailheads, all other trailheads within a 5-mile radius and on the City of Chattanooga's website, when necessary.
- Following construction, a new, permanent asphalt greenway path will be constructed through the area of the work zone which may have been damaged or temporarily relocated as a result of the construction of the I-75 bridge over South Chickamauga Creek.

Other: The following environmental commitments are being made in regard to the Brown Acres Golf Course and are in compliance with the approved December 2017 Section 4(f) De Minimis Determination:

- For the golf cart segments immediately adjacent and parallel to I-75, temporary asphalt pavement golf cart paths will be constructed and placed into service prior to the removal of the existing golf cart paths within the project area. These temporary golf cart paths will be maintained for the duration of construction until permanent asphalt paths can be constructed near the completion of the project.
- For the golf cart segment located within the construction area of the I-75 bridge over South Chickamauga Creek, a temporary asphalt pavement golf cart path will be constructed and placed into service prior to the removal of the existing golf cart path within the construction area.

This temporary golf cart path will be maintained for the duration of construction until a permanent concrete path can be constructed near the completion of the project.

- The golf cart path within the construction area of the I-75 bridge over South Chickamauga Creek will remain in service during the construction of the I-75 bridge. Temporary pedestrian/golf cart overhead protection measures will be used to protect golfers/pedestrians traversing the work zone.
- If it becomes necessary to close the golf cart path for any reason during construction of the I-75 South Chickamauga Creek bridge, work will be conducted outside normal operating hours when the golf cart path is not open to the public. Project personnel will work closely with golf course management to ensure that there are no golfers stranded on the south side of I-75 during any unscheduled closures.
- While every effort will be made to keep the golf cart path open, occasional, temporary closures may be necessary for construction of the bridge. These closures will be of limited duration and will be coordinated with the golf course.
- If an event occurs during construction that creates an unsafe situation either under or immediately adjacent to the bridge, the golf cart path will be shut-down immediately and the situation will be resolved as quickly as possible so that the golf cart path can be reopened.
- Prior to and during construction, notices of potential temporary golf cart path closures will be posted at the Brown Acres Golf Course Club House, Camp Jordan and on the City of Chattanooga's website, when necessary.
- Following construction, new asphalt or concrete golf cart paths will be reconstructed to pre-construction conditions through the areas of the work zones which may be damaged or relocated as a result of the construction of the South Chickamauga Creek bridge and I-75 widening.

Hazardous Materials: Asbestos Containing Material (ACM) was identified in the bearing pads on Bridge No. 33I00240059, S. Moore Road over I-24 and Bridge No. 33I00240061, McBrien Road over I-24. The State of Tennessee asbestos accreditation requirements (TDEC Rules Chapter 1200-01-20) mandates that ACM abatement work be performed by an accredited firm (contractor) using accredited abatement workers and supervisors. Abatement of this material should be accomplished per SP202ACM Special Provision Regarding Removal of Asbestos-Containing Materials. ACM abatement should be completed prior to any demolition activities if possible. Prior to the demolition or rehabilitation of any structure (bridge or building), the contractor is required to submit the National Emission Standards for Hazardous Air Pollutants standard 10-day notice of demolition to the TDEC Division of Air Pollution Control (per TDOT Standard Specifications for Road and Bridge Construction (January 1, 2015) Sections 107.08 D and 202.03). (TDOT HazMat Section, Environmental Studies Request, 06/26/2017)



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL DIVISION
SUITE 900 - JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-0334**

07/25/2018

Mr. Gary Fottrell
Environmental Program Engineer
Federal Highway Administration
404 BNA Drive, Suite 508
Nashville, TN 37217

Subject: Construction Reevaluation of Interstate 75 (I-75) at Interstate 24 (I-24) Interchange, From I-24, East of Belvoir Avenue, to I-24/I-75 Interchange and I-75 at the Tennessee-Georgia State Line to I-75, West of East Brainerd Road, Chattanooga, Hamilton County, Tennessee, PIN 114174.00

Dear Mr. Fottrell:

This reevaluation of environmental, social and economic effects is for the entire project. The entire project from I-24, east of Belvoir Avenue, to the I-24/I-75 interchange and I-75 at the Tennessee-Georgia State Line to I-75 West of East Brainerd Road is now being advanced to the Construction phase. This reevaluation has been conducted in accordance with 23 CFR 771.129.

The proposed project is listed in the Chattanooga-Hamilton County/North Georgia Transportation Planning Organization's (CHC/NGTPO's) Transportation Improvement Program (TIP) for Fiscal Years 2017 -2020 as TIP # 33020. The corresponding TIP page is included in Attachment A.

Federal and State project numbers for various stages of project development are listed in the table below.

Project Phases and Corresponding Project Numbers

Phase	Federal Aid	State Project Number
Preliminary Engineering	IM/NH-75-1(131)	33005-0176-44 (PE-N) 33005-1185-44 (PE-D)
Right of Way	IM/NH-75-1(131)	33005-2185-44
Construction	IM/NH-75-1(131)	33005-3181-44

Project History

This Reevaluation is for the D-List Categorical Exclusion (CE) that was previously approved by the Federal Highway Administration (FHWA) on March 27, 2018. Refer to Appendix A for a copy of the D-List CE.

In 2006, the project area was evaluated in a Road Safety Audit Report (RSAR). The findings indicated the area had a high crash rate. Further review found that truck rollovers were common on the I-75 northbound and southbound ramps, with speed being a contributing factor. Rear-end and sideswipe crashes were found to be high on the I-75 northbound lanes between the Ringgold Road interchange and the I-24/I-75 interchange. The on and off ramps at the Tennessee Welcome Center located between the Ringgold Road and I-24/I-75 interchanges also include short merging distances. Refer to Appendix B for a copy of the 2006 Road Safety Audit report.

In 2012, the FHWA approved an Interchange Access Request (IAR) for I-75 at I-24. The IAR presented a preliminary purpose and need for the project as follows, "The purpose of the modifications to the I-24/I-75 interchange is to decrease congestion, improve substandard ramp geometry, improve safety, increase interstate capacity, and improve traffic operations. The modifications are needed to provide a safer facility for roadway users due to high crash rates and truck rollovers throughout the I-24/I-75 interchange." The IAR has served as the basis for the National Environmental Policy Act (NEPA) process. Refer to Appendix B for a copy of the 2012 IAR.

A public meeting was held on October 16, 2014 at the East Ridge Community Center located at 1517 Tombras Avenue, East Ridge, Tennessee. Details of this meeting were included in the approved D-List CE. A meeting summary and transcript are provided in Appendix C to the approved D-List CE, located in Appendix A. Since the approval of the D-List CE, no further public involvement has been conducted.

In June 2017, Tennessee Governor Bill Haslam signed into law the Improving Manufacturing, Public Roads, and Opportunities for a Vibrant Economy (IMPROVE) Act, which provides a funding increase for road and bridge projects. When this project originally began the NEPA process, the PIN was 114174.00 as reflected in the original technical section coordination. When the project was listed in the IMPROVE Act the PIN changed to 124073.00. Since then, the project PIN was changed back to the original PIN 114174.00 for clarity.

Project Description

The proposed project involves modifying the existing I-75 at I-24 interchange. The project area includes I-24 east of Belvoir Avenue to the I-24/I-75 interchange, I-75 at the Tennessee-Georgia state line to I-75 west of the East Brainerd Road interchange. The project area also includes the Tennessee Welcome Center located in the southeastern portion of the project area. Modifications include widening the interstate by adding additional lanes with the on ramps at Ringgold Road, South Moore Road, and East Brainerd Road and then dropping those lanes to tie into the existing system with the off ramps at these adjacent interchanges. The I-24/I-75 ramps will be widened to three lanes and the radii increased to a minimum 1,200 feet to allow for 55 miles per hour (mph) design speed. The I-24 ramps would be reconfigured to provide all entry and exit along the right side of I-75. The project also modifies the traffic circulation patterns of the existing Welcome Center by reconfiguring the entrance and exit to eliminate the weaving condition along northbound I-75. The modification would realign the ramp to the west of

the existing Welcome Center and merge with I-75 north of the existing Welcome Center. Traffic along the proposed ramp traveling northbound I-75 will use a ramp parallel to the existing northbound ramp and vehicles traveling to I-24 westbound will diverge onto the I-24 flyover ramp. Refer to Attachment B for the Project Location Map.

On July 9, 2018, TDOT's Strategic Transportation Investments Division (STID) submitted an IAR revision request to FHWA proposing two modifications to the previously approved IAR. The first proposed revision would change the proposed alignment of the Ringgold Road/Welcome Center ramp to I-75 and I-24 (Ramp D) from being located behind the Welcome Center to being located in front of the Welcome Center. The benefits of this proposed change include the following:

- Reduced environmental impact to wetland areas.
- Reduced overall environmental footprint.
- Elimination of proposed Right-of-Way acquisition.
- Ramp F to Ramp D meeting driver expectation for ramp merges entering from the right.
- Gore spacing is improved by approximately 580 feet (Exit-Entrance) from the approved IAR.

The second proposed revision is to shift the Ringgold Road/Welcome Center ramp (Ramp D) to I-24 (Ramp H), approximately 150 feet to the north of the location shown in the approved IAR. This proposed change would reduce the amount of fill material required at the tie-in point. In addition, motorists would gain additional time before having to choose between I-24 West and I-75 North. While these proposed revisions would change the layout and design of the proposed project, they would have no impact on the overall operations of the subject interchange. The proposed modifications would have no impact on the number of access points entering/exiting the system; therefore, the traffic distribution remains unchanged from that presented in the previously approved IAR. Refer to Appendix B for a copy of the IAR revision request letter and Conceptual Layout.

On July 24, 2018, FHWA concurred with TDOT's IAR revision request. According to the concurrence letter, the IAR revision process will be finalized upon the completion and approval of this Reevaluation. Refer to Appendix B for a copy of FHWA's concurrence letter.

Documentation in the Attachments and Appendices may include only one or both of the aforementioned PINs.

Need and Purpose

The I-24 corridor runs diagonally southeast from south of Marion, Illinois, to Chattanooga, Tennessee, and provides a connection between I-75 and I-59. The I-75 corridor is a major north-south interstate that runs from the northern tip of Michigan to the southern tip of Florida. It passes through several large cities including Detroit, Cincinnati, Atlanta, and Tampa. These two heavily utilized corridors converge on the southeast side of Chattanooga to form the I-75 at I-24 interchange.

Continued growth in the area and traffic volume increases along the I-24 and I-75 corridors has resulted in deficient traffic operations due to increased congestion and the associated safety

issues that accompany higher traffic volumes. Substandard ramp geometry and volume increases have caused safety issues. The modifications are needed to provide a safer facility for roadway users by reducing high crash rates and truck rollovers throughout the I-24/I-75 interchange area. The traffic circulation patterns of the existing welcome center also create substandard weaving conditions, causing safety issues along northbound I-75.

Based on the needs established above, the purpose of the project is to improve substandard ramp geometry, decrease interstate congestion, improve traffic operations, improve safety at the interchange and Welcome Center and fulfill the legislative mandate of the IMPROVE Act.

The reevaluation of the environmental effects for this proposed project included the review of the Conceptual Layout of the ramp realignment dated July 9, 2018 along with the information presented in the D-List CE. This document has been updated to include areas not addressed in the original document and/or for which policy or regulations have resulted in the need for updated information or studies. Of particular interest to this Reevaluation are the following topics:

Relocation and Right-of-Way Impacts

As presented in the approved D-List CE, the proposed project will require the acquisition of approximately 5.1 acres of permanent ROW. The previously proposed alignment for the ramps in the vicinity of the Welcome Center were to be constructed within the existing ROW. The proposed IAR modifications in the July 9, 2018 revision request letter would result in moving the proposed alignment of the ramps closer to the existing alignment along I-75, which would not result in any changes to the previously proposed ROW. Refer to Attachment B for a copy of the Conceptual Layout.

Hazardous Materials

In recent coordination with the TDOT Hazardous Materials Section dated July 25, 2018, the Section determined that "Based on the Interstate Access Request Revision letter dated 9 July 2018, no new hazardous materials sites are associated with the proposed ramp revision and no additional hazardous material studies are recommended at this time."

Refer to Attachment C for a copy of the updated Hazardous Materials correspondence.

Wetlands

As presented in the approved D-List CE, the proposed project would potentially impact four (4) perennial streams, two (2) intermittent streams and eight (8) wetlands within the project limits. The previously proposed alignment of the Ringgold Road/Welcome Center Ramp to I-75 and I-24 (Ramp D) was expected to result in wetland impacts. However, as a result of the proposed revisions to the IAR, the new proposed alignment of Ramp D to the western side of the existing Welcome Center would reduce the amount of wetland impacts at this location.

In recent coordination with the TDOT Ecology Section dated July 25, 2018, the Section confirmed this, stating that "The proposed changes result in reduced ecological impacts and occur within an area previously studied, therefore no further coordination is necessary."

Refer to Attachment D for a copy of the updated Ecology correspondence.

Federally Protected Species List and Biological Assessments

The approved D-List CE reported eight (8) protected species that were identified within a one (1)-mile radius of the project limits and three (3) protected species within the one (1)-mile to four (4)-mile radius of the project limits. As indicated in the updated Ecology Section correspondence referenced above, "The proposed changes result in reduced ecological impacts and occur within an area previously studied, therefore no further coordination is necessary."

Floodplain Management

Portions of the project are located in Zone AE (Cross-Hatched) and 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 MOU between FHWA and FEMA. The design of the roadway system will be consistent with the MOU between FHWA and FEMA and with the floodplain management criteria set forth in the National Flood Insurance Regulations of Title 44 of the 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 Flood Insurance Rate Maps (FIRMs) in Hamilton County, Panel 363 of 530, Map #47065C0363F; Panel 364 of 530, Map #47065C0364F; Panel 368 of 530, Map #47065C0368F; and Panel 477 of 530, Map #47065C0477F. FEMA FIRM Maps are included in Appendix E to the approved D-List CE located in Appendix A.

Air Quality

1. Transportation Conformity

In recent coordination with the TDOT Air and Noise Section dated July 25, 2018, the Section determined that "The relocation of the welcome center ramps will not affect the results or conclusions of the air quality and noise evaluations. Therefore, those evaluations remain valid for the current plans."

Refer to Attachment E for a copy of the updated Air and Noise correspondence.

2. Mobile Source Air Toxics (MSAT)

Refer to the July 25, 2018 Air and Noise determination provided in the Transportation Conformity Section above.

Noise Impacts

Refer to the July 25, 2018 Air and Noise determination provided in the Air Quality Section above.

Section 4(f) and Section 6(f)

As presented in the approved D-List CE, two Section 4(f) resources, the South Chickamauga Creek Greenway and the Brown Acres Golf Course, have been identified within the project area. On December 22, 2017, as the Official with Jurisdiction (OWJ) for both resources, the City of Chattanooga agreed that with the mitigation measures outlined in the D-List CE, the impacts to the 4(f) resources are considered minor, or de minimis. On March 27, 2018, FHWA approved both Determination of Section 4(f) De Minimis Use documents. The proposed design modifications to the IAR would not result in a change to any previously documented impacts to these resources.

Refer to Appendix G of the approved D-List CE located in Appendix A for copies of all relevant Section 4(f) documentation and coordination.

The proposed project does not involve the use of property assisted by the Land and Water Conservation Fund (LWCF).

Cultural Resources/Section 106 Coordination

1. Architectural/Historical and Archaeological Resources

Architectural/Historic Resources: In 2014, a Historical and Architectural Survey was prepared for the project. After surveying the area of potential effect (APE) for the project, historians identified the Anna B. Lacey School and Belvoir Historic District as being eligible for the National Register of Historic Places (NRHP); however, the report indicated that the proposed project alternatives would have No Adverse Effect on either the property or the district.

On October 23, 2014, the Tennessee State Historic Preservation Office (TN-SHPO) determined that "Based on the information provided, we find that the project area contains two cultural resources eligible for listing in the National Register of Historic Places: Anna B. Lacey School and Belvoir Historic District. We further find that the project as currently proposed will not adversely affect these resources."

In recent coordination with the TDOT Historic Preservation Section dated July 24, 2018, the Section determined that "Based on the information provided, the TN-SHPO letter from 10/23/2014 remains valid for historic/architectural resources."

Refer to Attachment F for a copy of the updated Historic Preservation correspondence and the 2014 TN-SHPO concurrence letter. Refer to Appendix H of the approved D-List CE located in Appendix A for a copy of the 2014 Historical and Architectural Assessment.

Archaeological Resources: In June 2014, a Phase I Archaeological Assessment of the proposed improvements to the I-75 at I-24 interchange was prepared. No new archaeological sites were identified as a result of the investigation and no further archaeological investigations were recommended. A copy of the Phase I Archaeological Assessment is included in Appendix H of the approved D-List CE located in Appendix A.

In correspondence from the TN-SHPO, dated May 29, 2014, it was stated that "Based on the information provided, we find that the project area contains no archaeological resources eligible for listing in the National Register of Historic Places. If project plans are changed or archaeological remains are discovered during construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act." A copy of the TN-SHPO letter is included in Attachment F.

In recent coordination with the TDOT Archaeology Section, the Section determined that "Based on the conceptual layout dated 07/09/2018, I find that our previous archaeological survey and SHPO letter dated 05/29/2014 remain valid. The project area contains no archaeological resources eligible for listing in the National Register of Historic Places."

Refer to Attachment F for a copy of the updated Archaeology correspondence and the 2014 TN-SHPO concurrence letter. Refer to Appendix H of the approved D-List CE located in Appendix A for a copy of the 2014 Phase I Archaeological Assessment.

2. Section 106 Coordination

Native American Consultation (NAC) coordination was initiated by the TDOT Archaeology Section on March 11, 2014. Requests were sent to the following tribes: the Cherokee Nation, the Chickasaw Nation, the Eastern Band of Cherokee Indians, the Eastern Shawnee Tribe of Oklahoma, the Kialegee Tribal Town, the Muscogee (Creek) Nation, the Poarch Band of Creek Indians, the Shawnee Tribe, the Thlopthlocco Tribal Town, and the United Keetoowah Band of Cherokee Indians (UKB). As presented in the D-List CE, only one tribe, the UKB, responded on March 12, 2014, indicating that they had no comments or objections to the proposed project.

In the July 25, 2018 correspondence from the TDOT Archaeology Section discussed in the previous section, the Section determined that "the 03/11/14 documentation regarding consultation with federally recognized Native American tribes remains valid."

Refer to Attachment F for a copy of the updated Archaeology correspondence and Appendix H of the approved D-List CE located in Appendix A for a copy of the 2014 NAC coordination.

Environmental Commitments

Commitments are involved and are described in the attached green sheet.

Other Issues

In recent coordination with the TDOT Multimodal Transportation Resources Division dated July 25, 2018, the Division determined that "This project is exempt from multimodal accommodations. It is on a controlled access facility where such users are prohibited."

Refer to Attachment G for a copy of the Multimodal correspondence.

Based on this reevaluation, it has been determined that there are no substantial changes in the project's effects or the concept of the project as discussed in the D-List CE. There are no new developments that would affect the conditions and impacts previously reported. The anticipated impacts have not changed and the examination of the Conceptual Layout dated July 9, 2018 indicated that there have been no new environmental consequences.

In regard to these conclusions, the Department believes that the NEPA document type remains valid for the requested administrative action. A space is provided below for your concurrence.

Sincerely Yours,



Sharon Sanders
Transportation Manager 1

Concurrence:



Federal Highway Administration
Environmental Program Engineer

Date: 7/25/18

EHH/SS

cc: John Kahle
Klint Rommel
Tammy Sellers

Attachments
Appendices