

ENVIRONMENTAL ASSESSMENT

I-24 Southeast Choice Lanes

Davidson and Rutherford Counties, TN

TDOT PIN 134727.01

Submitted pursuant to 42 USC 4332(2)(c)

by

U.S. Department of Transportation, Federal Highway Administration

and the

Tennessee Department of Transportation

In cooperation with the

U.S. Army Corps of Engineers, Nashville District

and the

Tennessee Department of Environment and Conservation

01/30/2026

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ENVIRONMENTAL ASSESSMENT

I-24 SOUTHEAST CHOICE LANES

January 2026



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ISSUE AND REVISION RECORD

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1. PURPOSE AND NEED

WHAT'S IN CHAPTER 1?

Chapter 1 provides an overview of the proposed Project, including Project limits, prior studies, existing conditions and what will change. Chapter 1 also discusses why improvements along the Interstate (I-) 24 Southeast corridor are needed and who is leading the proposed Project.

1.1. What is the I-24 Southeast Choice Lanes project?

The Tennessee Department of Transportation (TDOT), in coordination with the Federal Highway Administration (FHWA), is proposing to make improvements to I-24 between I-40 and I-840 in Davidson and Rutherford counties, Tennessee. The I-24 Southeast Choice Lanes project (proposed Project) would include widening the existing interstate to accommodate the addition of price-managed lanes (Choice Lanes) and interchange improvements. The proposed Choice Lanes, a type of price-managed lane, would help ease urban congestion along the project corridor. Since 2014, managed lanes have been analyzed in various transportation planning documents and studies as a viable alternative to traditional interstate widening projects involving the addition of general-purpose lanes. Refer to **Section 1.4** for more information on these studies.

What are Choice Lanes?

Choice Lanes are new, additional and optional lanes that use variable pricing to proactively manage demand and provide users improved travel times. Motorists can maintain consistent travel speeds even when the adjacent existing lanes are congested. These new lanes typically operate at 45 miles per hour (mph) during rush hours when traditional lanes are slow or at a standstill during peak periods.

TDOT and the engineering and environmental consulting firms supporting the proposed Project are referred to as the Project Team throughout this document. A detailed description of the proposed Project's background is included in the Need and Purpose Memorandum (**Appendix B**).

1.2. What are the proposed Project limits?

The proposed Project is located along approximately 26 miles of I-24 between I-40 near downtown Nashville (Davidson County) and I-840 near Murfreesboro (Rutherford County) as depicted in **Figure 1-1**. The proposed Project would provide I-24 mainline improvements as well as improvements at the system-to-system interchanges at I-40 and I-440. The proposed Project limits were selected in accordance with the three guiding principles

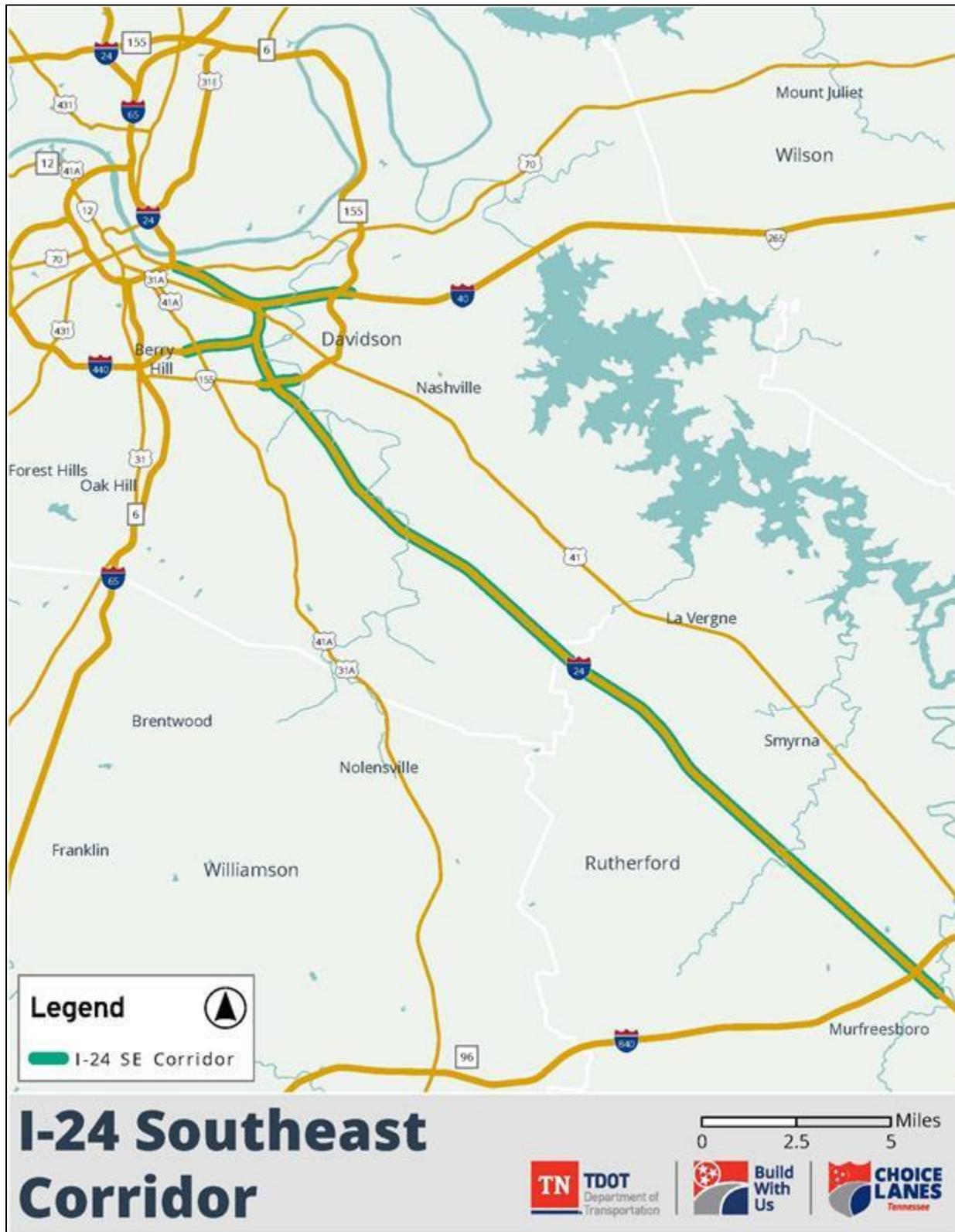
outlined in FHWA regulations for evaluating alternatives and avoiding commitments to transportation improvements before they are fully evaluated. Those principles are:

1. Connect Logical Termini and be of sufficient length to address environmental matters on a broad scope;
2. Have independent utility; and
3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

The Need and Purpose Memorandum (**Appendix B**) outlines how the proposed Project limits meet these guiding principles.

In addition to establishing limits for the proposed Project, an Environmental Technical Study Area (ETSA) was established according to TDOT guidelines to account for potential impacts the proposed Project may have on environmental resources within, and adjacent to, the proposed Project's footprint. The ETSA extends 300 linear feet beyond the proposed Project mainline, and 150 linear feet beyond tie-in points or ramps. For some environmental resources, potential impacts may not necessarily be constrained to the ETSA limits (e.g., noise impacts). An extended 500-foot buffer was used as a conservative measure to account for potential impacts to such resources, and is noted through the various sections in **Chapter 3**.

Figure 1-1: I-24 Southeast Choice Lanes Project Location Map



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1.3. What are the existing conditions along the I-24 Southeast corridor?

1.3.1. Travel Conditions

I-24 Southeast is an interstate facility that runs east to west, bisecting the state of Tennessee, and provides regional connectivity across middle Tennessee. This section of I-24 carries approximately 150,000-180,000 vehicles per day, including up to 25,000 trucks. Typical traffic congestion occurs along I-24 from the State Route (SR) 266 (Sam Ridley Parkway) interchange to the northern Project limits extending to I-40/I-24 toward downtown Nashville. Substantial and prolonged congestion impacting times beyond peak hour periods occurs on I-24 from south of SR 155 (Briley Parkway) to the I-40 at I-24 interchange, with additional congestion added to the network from the I-440 at I-24 interchange. The corridor currently includes High-Occupancy Vehicle (HOV) lanes, which are part of the existing infrastructure and are intended to promote carpooling and improve person-throughput¹; however, congestion persists despite their presence. As outlined below, continued population and employment growth will further worsen existing conditions. **Figure 1-2** and **Figure 1-3** represent existing congestion along the corridor during AM and PM peak hours.

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¹ Throughput is defined as the number of vehicles entering and exiting the network over a three-hour simulation period.

Figure 1-2: Existing Congestion on I-24 - AM Peak Hour



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1.3.2. Population Growth and Employment Trends

Population trends at the county level, as well as growth projections through 2045, are shown in **Table 1-1**. U.S. Census data indicates that both Davidson and Rutherford counties grew between 2000 and 2020, with Rutherford County experiencing the largest growth rate. Projections from the University of Tennessee indicate continued growth for both counties, with Rutherford County’s population expected to expand by approximately 1.6 times its 2020 level over the next 25 years.

Table 1-1: Population Estimates and Projections for Davidson County and Rutherford County

REGION	POPULATION				PERCENT CHANGE		
	2000	2010	2020	2045	2000-2010	2010-2020	2020-2045
Davidson County	569,891	626,681	715,884	832,218	10%	14%	16%
Rutherford County	182,023	262,604	341,486	546,129	44%	30%	60%

Source: U.S. Census,^{2,3,4} University of Tennessee⁵

The U.S. Census Bureau’s 2024 American Community Survey (ACS) 1-Year Estimates⁶ show that 442,511 of the 596,730 individuals (16 years and older) who live in Davidson County are employed. In Rutherford County, there are 294,430 residents over the age of 16, of whom 215,175 are employed. Of the 418,280 employed residents within Davidson County, 352,969 residents work in the same county. Of the 201,353 employed residents within Rutherford County, 133,448 residents work in the same county.⁷ **Table 1-2** shows employment in 2017 and projected employment in 2045 for Davidson and Rutherford counties, according to data available from the Greater Nashville Regional Commission (GNRC).

² U.S. Census Bureau – United States Summary: 2000, Accessed March 2024.

³ U.S. Census Bureau. "RACE." Decennial Census, DEC Redistricting Data (PL 94-171), Table P1, 2020, Accessed December 2023.

⁴ U.S. Census Bureau. "RACE." Decennial Census, DEC National Redistricting Data, Table P1, 2010, Accessed December 2023.

⁵ Tennessee State Data Center, University of Tennessee Boyd Center for Business and Economic Research, Accessed February 2024.

⁶ U.S. Census Bureau. "Selected Economic Characteristics." ACS 1-Year Estimates Data Profiles, Table DP03, 2024, Accessed October 2025.

⁷ U.S. Census Bureau. "Sex of Workers by Place of Work--State and County Level." ACS 1-Year Estimates Subject Tables, Table B08007, 2024, Accessed October 2025.

Table 1-2: Jobs Located in Davidson and Rutherford Counties (2017 and 2045)

GEOGRAPHY	EMPLOYMENT (2017)	EMPLOYMENT (2045)	PERCENT CHANGE
Davidson	638,277	863,700	35%
Rutherford	171,478	272,141	59%
Total	809,755	1,135,841	40%

1.4. What other studies have been conducted on this corridor?

TDOT and the GNRC have completed a series of studies over the past decade with the goal of identifying ways to address congestion along the I-24 corridor resulting from the region’s rapid population growth. With an emphasis on cost-effectiveness due to funding limitations, these studies have evaluated a range of multimodal approaches and managed lane strategies. A summary of those studies and their results is discussed here, with further information on each included in **Appendix B**.

- **I-24 Multimodal Corridor Study** (TDOT, 2014)⁸ – Intended to identify cost-effective projects and strategies to make I-24 safer and more efficient, concluding that continued interstate widenings consisting of adding general-purpose lanes were not a financially sustainable solution for TDOT in reducing congestion in urban areas. The study further concluded that legislation supporting managed lanes implementation should be explored.
- **Nashville Area MPO Managed Lanes Preliminary Feasibility Assessment** (2015)⁹ – Intended to introduce potential managed lanes concepts for the area and identify facilities suitable for a pilot program.
- **Tennessee Congestion Action Plans** (2022)¹⁰ – Developed as a result of previous planning studies, the 2022 Congestion Action Plan (CAP) provided recommendations for managed lanes and operations improvement in the middle Tennessee region, including several strategies for further evaluation and identified funding limitations to implementing recommendations.
- **TMA 10-Year Project Plan** (2023)¹¹ – Intended to provide a roadmap for the use of \$15 billion in state and federal funds, and to introduce a new project programming prioritization process.

⁸ [I-24 Multimodal Corridor Study](#). Accessed August 2025.

⁹ [Nashville Area MPO Managed Lanes Preliminary Feasibility Assessment](#), Accessed August 2025.

¹⁰ [TDOT Congestion Studies](#), Accessed August 2025.

¹¹ [TDOT 10-Year Plan](#), Accessed April 2024.

1.5. What is the need and purpose for the proposed Project?

The purpose of the proposed Project is to provide a cost-feasible¹² transportation option that offers travel time advantages with user participation for both passenger and commercial vehicles¹³ along I-24, between I-40 south of downtown Nashville and I-840 near Murfreesboro by addressing the following transportation issues:

1. Capacity
2. Travel times
3. Limited funding and accelerate project delivery

Based on the issues above, the proposed Project is needed to address increasing urban congestion caused by insufficient capacity, which can be defined and measured by slow travel speeds accompanied by high travel demand, weaving issues due to traffic density and geometric constraints at system-to-system interchanges and bottlenecks in critical areas along the corridor. I-24 in Nashville is a major corridor that connects the rapidly growing areas of Nashville to Chattanooga. In 2023, the Nashville Metropolitan Statistical Area (MSA) added 86 people a day to its population,¹⁴ which represents substantial population growth.

Recognizing Tennessee's policies have generated economic opportunity, bringing job creation and an overall increase in population, this growth is outpacing the state's transportation system to provide the necessary mobility and infrastructure for its commuters and tourists who may travel along I-24. There are limited funding and financing options as gas tax revenues decline mainly due to inflation and more fuel-efficient vehicles, which means fewer projects, slower progress and less benefit to communities and economies. As a result, the duration of congestion has increased with travel speeds and travel times worsening in recent years.

In 2022, TDOT developed CAPs as a coordinated, statewide response to formally strategize congestion management on freeways and major arterials. Following the passage of the TMA, TDOT's traffic and revenue studies, and industry outreach with private-sector partners, resulted in recommending the section of I-24 between Nashville and Murfreesboro for Tennessee's first Choice Lanes project. The Need and Purpose Memorandum (**Appendix B**) includes more detailed information and justification for the

¹² Cost-feasible is defined as the alternative financing mechanism (i.e., P3) that would allow for the proposed Project to progress into final design and construction phases. This terminology should not be confused with user fees, or the rates in which motorists who choose to use the Choice Lanes would pay.

¹³ [FHWA vehicle classes 1-10](#) would be allowed to use the proposed Choice Lanes.

¹⁴ [Press Release: Chamber Announces Nashville MSA Grew by 86 People Per Day in 2023](#).

proposed Project's need and purpose, including an outline of Measures of Effectiveness for analyzing the proposed Project's need.

1.6. What is the purpose of this Environmental Assessment?

An Environmental Assessment¹⁵ (EA) is a concise public document for which a federal agency is responsible that briefly provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI) in accordance with the National Environmental Policy Act (NEPA). For the proposed I-24 Southeast Choice Lanes project, this EA has been prepared to:

- Comply with NEPA, which is necessary for any project requiring federal approvals and/or relying upon federal grants or loans;
- Briefly discuss the proposed Project, its geographic limits and the purpose and need for it;
- Discuss the development and screening of the alternatives considered and analyzed;
- Evaluate the impacts of the proposed Project on the natural and built environments;
- Discuss and document the coordination and cooperation between the Project Team and agencies/stakeholders;
- Inform and solicit feedback from the public and decision-makers about the proposed Project and its effects on the environment; and
- Provide the environmental commitments and conclusions resulting from this EA.

1.7. Who is leading the proposed Project?

TDOT is leading the agency coordination with FHWA serving as the lead federal agency for the proposed Project. TDOT is overseeing the preparation and accuracy of the environmental documentation in coordination with FHWA. Lead agencies are responsible for NEPA compliance for transportation projects, including the responsibility of identifying the status and level of involvement of other agencies. **Table 1-3** indicates early coordination milestones and **Chapter 4** of this document further outlines agency coordination efforts.

¹⁵ [Environmental Assessment Class of Action](#), Accessed August 2025.

Table 1-3: Project Initiation Milestones

Date	Milestone
June 7, 2024	Letter of Intent (LOI)* delivered to FHWA for the proposed Project to be developed as an EA
June 17, 2024	FHWA concurrence with the proposed level of documentation and the initiation of the EA
June 26, 2024	Letters of Invitation sent to participating and cooperating agencies

*Refer to **Appendix A** for the Letter of Intent.

1.8. What funding is available for the proposed Project?

The Transportation Modernization Act was signed into law in early 2023 by Governor Bill Lee providing the state of Tennessee with \$3 billion in transportation revenue and authorizing the development and operation of user-fee facility projects (Choice Lanes) to address traffic congestion across the state.

The proposed Project would be funded using state funds provided by the TMA, as outlined in TDOT’s [10-Year Project Plan](#) (FY 2024-2033), and is included in the Statewide Transportation Improvement Plan (STIP) and Nashville MPO Transportation Improvement Program (TIP). The Project Team estimates that the allocated funding of \$250 million¹⁶ for the proposed Project would cover the costs for Project development, ROW acquisitions, utility relocations and the required public contributions for the proposed Project. The proposed Project

would be an alternative delivery project utilizing a Public-Private Partnership (P3) delivery model (**Figure 1-4**) where project financing represents the major difference with traditional project delivery methods.¹⁷

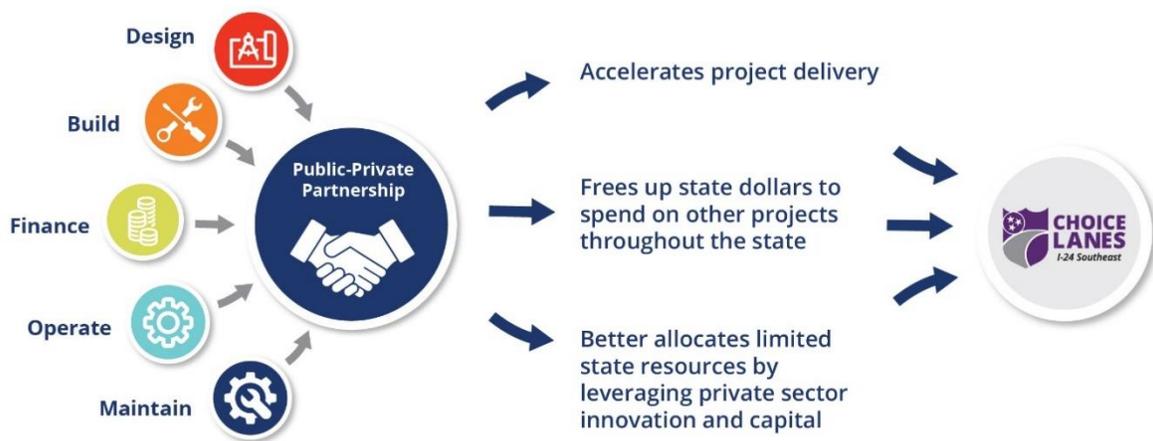
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¹⁶ An estimated cost of \$250 million for the proposed Choice Lanes project is included in TDOT’s 10-Year Plan.
¹⁷ FHWA, [Center for Innovative Finance Support - Public Private Partnerships \(P3\)](#), accessed August 2025.

While the proposed Project currently only includes state funding, it is reasonable to anticipate that federal grants and loans would be part of the P3 financial agreement. According to FHWA’s Major Project Guidance,¹⁸ the proposed Project meets the classification as a Major Project and therefore requires the Project Team to conduct a cost and schedule risk assessment workshop, which was held in April 2025 and helped better define the proposed Project costs. As the proposed Project costs become more clearly defined through this process, TDOT will coordinate any necessary updates to the proposed Project funding in the STIP and Nashville MPO TIP and long-range plans. The proposed Project schedule is still under development and will be updated as the Project progresses.

What is a P3? P3s are partnerships formed between public entities like TDOT and private companies, to leverage private-sector innovation and capital for transportation projects. Private-sector partners would design, build, finance, operate and maintain Choice Lanes projects. P3s allow for shared risks, accelerate project delivery, provide access to additional capital, enable a longer-term view of asset management and may reduce public costs.

Figure 1-4: P3 Delivery Overview



Source: Project Team, 2024.

¹⁸ FHWA, “[Issuance Major Project Guidance](#),” accessed July 2024.

2. PROJECT ALTERNATIVES

2.1. What is the purpose of the alternatives chapter?

The purpose of this chapter is to:

1. Summarize how the Project Team developed alternatives to meet the purpose and need of the proposed Project.
2. Summarize how the Project Team screened alternatives to identify a range of reasonable alternatives and why it eliminated certain alternatives from further consideration.
3. Describe the range of reasonable alternatives fully analyzed in this EA.

2.2. How were the alternatives developed and screened for the proposed Project?

In 2014, TDOT conducted the [I-24 Multimodal Corridor Study](#)¹⁹ that investigated a range of multimodal solutions to address future travel demands, with an emphasis on managing congestion, improving safety, maximizing the potential for freight diversion and preserving and enhancing the corridor's economic benefits. Within the I-24 Southeast corridor, the study recommended capacity projects (adding general-purpose lanes) and operational projects (interchange modifications or additions, lengthening ramps and ramp metering). The study also recommended exploring legislation that would allow for the implementation of managed lanes including allowable access restrictions, express lanes and variable pricing. This recommendation was made due to the potential benefits to operations along I-24 and mobility and access benefits that could result from managed lanes implementation, which would be more financially viable than a project consisting solely of adding general-purpose lanes. Following this recommendation from the 2014 Multimodal Corridor Study, the Nashville MPO completed the Managed Lanes Preliminary Feasibility Assessment (2015)²⁰ and the CAP for Middle Tennessee (2022), both resulting in recommendations for interstate improvements on the I-24 Southeast corridor, including widening for the addition of managed lanes, interchange improvements and ramp metering.²¹ Based on the recommendations of these studies, the Project Team initiated the development of the preliminary Choice Lanes alternatives.

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¹⁹ TDOT, "Interstate 24 Multimodal Corridor Study," 2014. Accessed via [TDOT Corridor and Feasibility Studies](#) web page, August 8, 2024.

²⁰ GNRC, "Nashville Area MPO Managed Lanes Preliminary Feasibility Assessment," 2015. Accessed via <https://www.gnrc.org/196/Planning-Activities> web page, August 8, 2024.

²¹ TDOT, "Appendix D Middle Tennessee," 2022. Accessed via [TDOT Congestion Studies](#) web page, August 19, 2024.

The Project Team evaluated and refined these alternatives based on the following three levels of screening:

- Level 1 – Evaluation of Preliminary Alternatives focused on fatal flaws, with the ability to meet the purpose and need as the screening criteria.
- Level 2 – Evaluation of Refined Preliminary Alternatives focused on engineering feasibility, safety considerations and environmental and social impacts. This alternatives evaluation was first based on the mainline road widening template (Level 2A) and then on access locations and access types (Level 2B).
- Level 3 – Evaluation of Reasonable Alternatives involved a detailed analysis of environmental and social impacts, planning-level cost estimates and agency/public input.

The following sections summarize the results of the screening process. For a detailed description of the alternatives development process, alternatives considered and scoring results for all three screening levels, refer to the I-24 Southeast Choice Lanes Preliminary Geometric Alternatives Screening Report (**Appendix E**)

2.2.1. What did the Level 1 (fatal flaw) screening consist of and what were the results?

Using the recommendations from the planning studies mentioned in the previous section, Level 1 screening was carried out to qualitatively assess if the preliminary alternatives met the proposed Project’s purpose and need. Alternatives were evaluated based on Measures of Effectiveness (MOEs) and scored either “Yes” for fully achieving the performance measure or “No” for partially or not achieving the performance measure. Preliminary alternatives not fully meeting the purpose and need were deemed fatally flawed and an unreasonable alternative.

The following preliminary alternatives were evaluated:

- No-Build
- Two additional general-purpose lanes in each direction
- Two Choice Lanes in each direction
- Single Choice Lane in each direction
- Two reversible Choice Lanes

Based on the results of the Level 1 screening, the two Choice Lanes in each direction alternative was carried forward for further refinement and analysis because it was the only preliminary alternative that fully achieved the purpose of increasing capacity and improving travel time. All other preliminary build alternatives were eliminated from further consideration because they did not meet the purpose and need of the proposed Project. As a point of emphasis, the Level 1 screening process included eliminating the alternative consisting of two additional general-purpose lanes in each direction. Even though it would add capacity and could improve congestion compared to a no-build condition, travel times,

roadway operations, mobility, and access are only marginally improved without a system for urban congestion management. Additionally, this preliminary alternative does not leverage innovative funding and financing mechanisms called for in the TMA. This decision allowed the Project Team to align the alternatives screening process with previous plans and studies recommending price-managed lanes along the I-24 corridor. Refer to **Appendix E** for details on screening criteria, performance measures and screening results.

2.2.2. What did the Level 2 (preliminary alternatives) screening consist of and what were the results?

The Level 2 screening involved two steps. The first (Level 2A) identified and assessed the mainline road widening templates. Once mainline widening templates were identified, the second step (Level 2B) identified and assessed corridor access points. The outcome of the Level 2 screening was two reasonable alternatives that identified the proposed configuration of Choice Lanes and access point locations and types.

LEVEL 2A SCREENING: REFINED MAINLINE WIDENING PRELIMINARY ALTERNATIVES

The two refined mainline widening preliminary alternatives considered in the Level 2A screening included:

- No-Build
- Two Choice Lanes on the outside
- Two Choice Lanes on the inside

To view the details of each alternative, including typical sections, refer to **Appendix E**.

These alternatives were assessed in the Level 2A screening comparatively based on their ability to meet the supporting Project goals using the same performance measures in the Level 1 screening. A qualitative and quantitative assessment of each alternative's environmental impacts was also performed, with a focus on key resources that could drive decisions. ROW impacts and the likelihood of interchange modifications, which may be more disruptive to the public because of additional ROW acquisition and construction complexity, were used as an indicator of the likelihood of potential impacts to communities along the corridor.

Ultimately, it was concluded that neither alternative would be carried forward in its entirety. Rather, based on the constraints along the corridor, it was determined that refining the design to develop reasonable alternatives must include a combination of Choice Lanes on the inside and the outside. This provided the most flexibility for design to accommodate the varied constraints along the corridor, allowing for a reduction of interchange modification needs, Section 4(f) impacts and the incorporation of bridges to reduce direct stream impacts. As part of future refinements, it was also concluded that flexible delineators with a 4-foot buffer, rather than a concrete barrier separation, would

be incorporated to reduce the proposed Project’s footprint, minimize ROW acquisition and reduce construction costs. The delineator separation also allowed for operational flexibility and increased safety in the Choice Lanes. **Figure 2-1** provides an example of general-purpose lanes separated from managed lanes by flexible delineators, which are reflective and impact-resistant bollards.

Figure 2-1: Flexible Delineator Example – General-purpose Lanes separated from Managed Lanes



Source: Google Streetview.

LEVEL 2B SCREENING: ACCESS POINT COMPLEMENTARY CONCEPTS

Following the assessment of mainline alignment alternatives, a refined mainline template was developed using a combination of Choice Lanes on the inside and the outside, a flexible delineator with a 4-foot buffer and elevated structures for Choice Lanes depending on ROW needs and other constraints. Using the refined template, access point locations were identified, developed and evaluated at 26 locations.

The process to identify and screen potential Choice Lanes access points that complement the refined mainline template considered forecasted Choice Lanes demand along the corridor, geometric feasibility of interchange modifications and potential traffic and revenue drivers inherent within P3 projects. Following the screening, 17 access locations were carried forward for further consideration as summarized below.

These access locations are shown on **Figure 2-2** and **Figure 2-3** in the following section.

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- Two locations are proposed exclusive Choice Lanes system-to-system direct connector ramps.
- Six locations are proposed ingress/egress points for Choice Lanes access from the interstate to an arterial street that currently has general-purpose lane access.
- Two locations are proposed exclusive Choice Lanes ingress/egress access points from the interstate to an arterial street where there is no existing general-purpose lane access.
- Seven locations are proposed direct merge access points from general-purpose lanes to Choice Lanes.

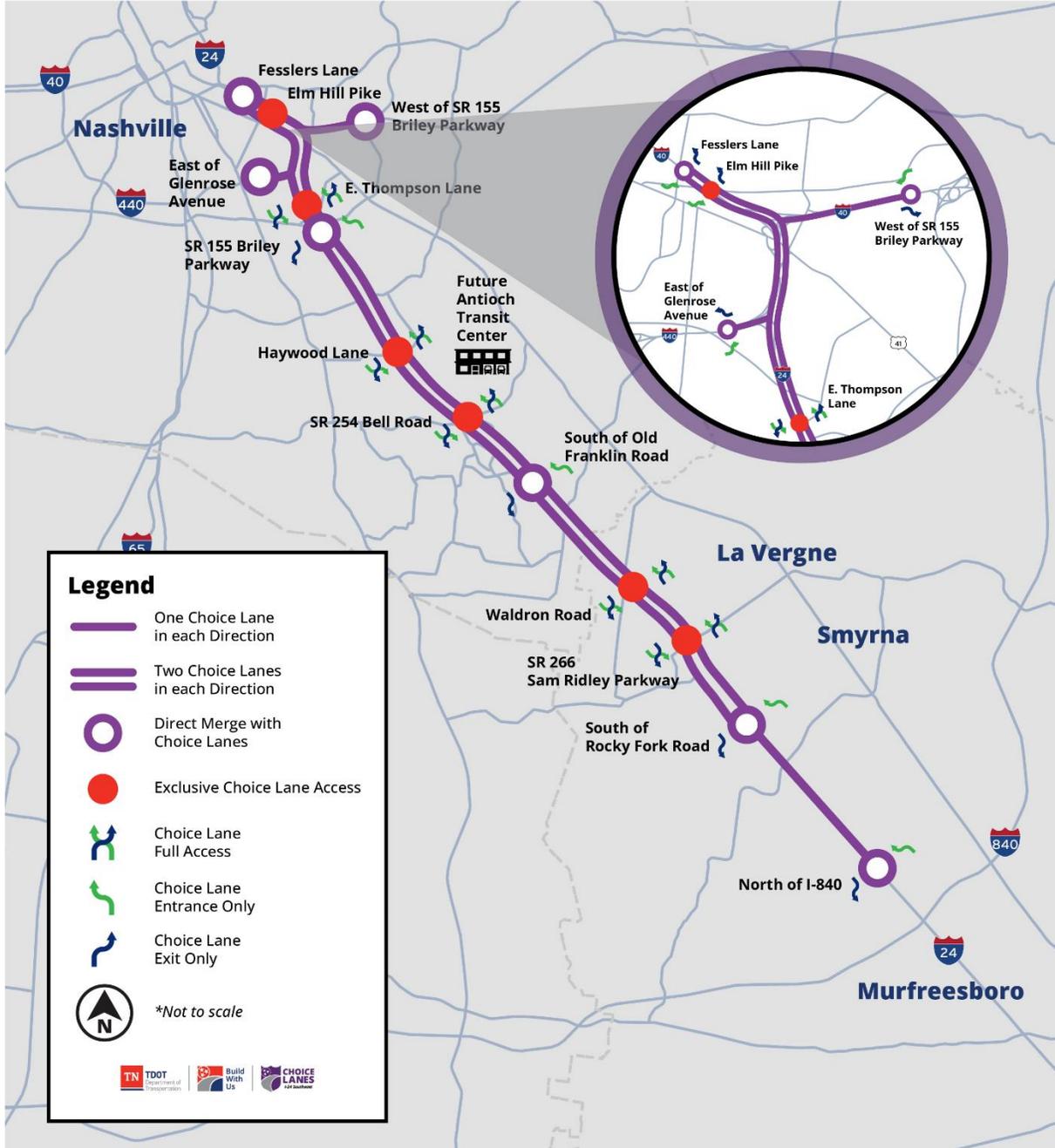
Refer to **Appendix E** for further details on the access points considered, the screening process and the results of the evaluation.

2.2.3. What did the Level 3 (reasonable alternatives) screening consist of and what were the results?

Following the identification of the mainline widening alignment and access points, two reasonable alternatives—Alternative 1 and Alternative 2—were identified for detailed analysis. **Figure 2-2** and **Figure 2-3** provide an overview of Alternative 1 and Alternative 2, respectively. The alternatives differ in certain locations where Choice Lanes are proposed on the inside versus the outside, where Choice Lanes are proposed at-grade or elevated and at access point locations. For access point locations, Alternative 1 included 13 Choice Lanes access points, including system-to-system access at I-40 and I-440, and Alternative 2 included 11 Choice Lanes access points, also including system-to-system access at I-40 and I-440. For a detailed description of Alternatives 1 and 2, refer to **Appendix E**.

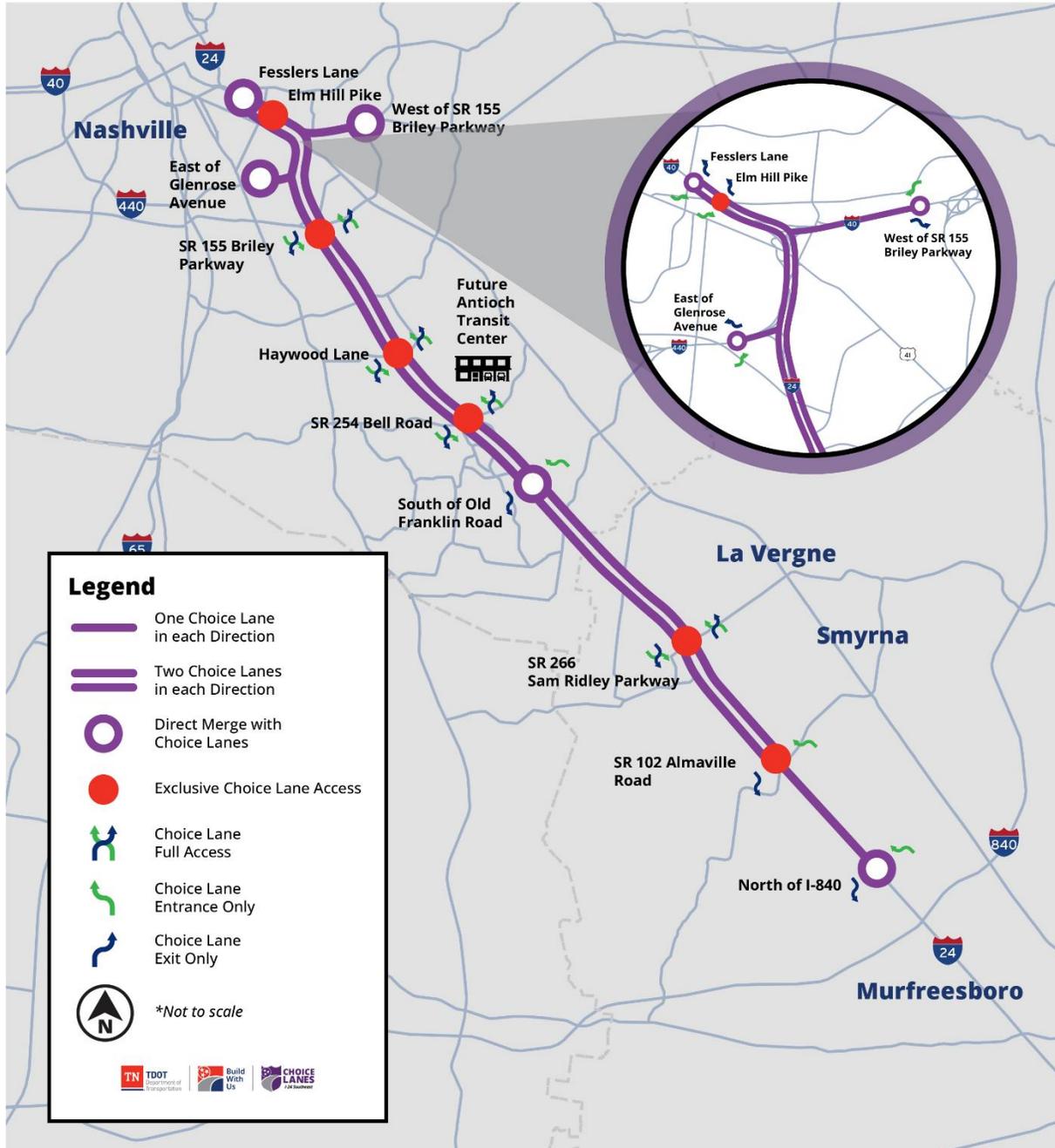
Alternatives 1 and 2 were evaluated based on environmental and social impacts, planning-level cost estimates and stakeholder and public input. The alternatives were presented to the public and stakeholders during public involvement meetings on August 14, 21, 28 and 29, 2024, and a stakeholder meeting on August 7, 2024. **Figure 2-2** and **Figure 2-3** reflect the alternative figures presented at these meetings. During these meetings, feedback and comments were received from the public, agencies and Project stakeholders that informed the refinement and selection of alternatives to carry forward for evaluation in this EA. The information presented during the public meetings is available on the [Project website](#), including detailed maps depicting lane and interchange configurations and proposed bridges, retaining walls and ROW for Alternatives 1 and 2. Refer to **Chapter 4** for more information on engagement methods and public and stakeholder feedback.

Figure 2-2: Alternative 1 Overview



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Figure 2-3: Alternative 2 Overview



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Table 2-1 summarizes the results of the Level 3 screening. Overall, Alternative 2 had much higher impacts—specifically to streams, wetlands and ROW acquisition—and cost approximately \$18 billion more than Alternative 1. Combined with public and stakeholder input (see **Chapter 4**), which expressed a general concern for environmental and social impacts, Alternative 1 was retained for further analysis and refinement, while Alternative 2 was eliminated from further consideration. However, the Alternative 2 design option at the I-24 interchange at SR 155 (Briley Parkway), which is an option preferred by the public and stakeholders, and the mainline widening option between Fesslers Lane and the I-24/I-40 interchange were retained for further consideration for incorporation into a refined Alternative 1.

Table 2-1: Level 3 Screening Results

Category	Performance Measure	No-Build	Alternative 1	Alternative 2
ROW	Land acquisition (acres)	0	25.8	44.8
	Parcels (number of tracts)	0	111	116
Relocations	Total Relocations	0	45	62
	Residential Relocations	0	29	44
	Business Relocations	0	16	18
	Institutions/School/Church Relocations	0	0	0
Historic Properties	Number of historic properties in the Area of Potential Effects	N/A	15	15
	Number of historic properties potentially adversely affected	0	3	3

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Category	Performance Measure	No-Build	Alternative 1	Alternative 2
Section 4(f) Properties	Total number of Section 4(f) property encroachments (potential uses)	0	2	3
	Total acres of encroachment (potential uses)	0	0.7	0.6
	Do all the encroachments meet exception, temporary occupancy, <i>de minimis</i> , or programmatic criteria?	N/A	Yes	No
Section 6(f) Properties	Section 6(f) resources impacted	0	0	0
Hazardous Materials Sites	Hazardous materials sites encountered	0	7 high-risk, 7 low-risk	3 high-risk, 14-low risk
Wetlands & Streams	Freshwater wetland impacts (nearest 0.1 acre)	0	8.28	6.2
	Open water/pond impacts (nearest 0.1 acre)	0	0	0
	Stream impacts (linear feet; includes direct impacts and indirect shading impacts)*	0	19,635	12,656
Floodplains	Floodplain encroachment (nearest 0.1 acre)	0	16.8	11.2
Threatened and Endangered Species	Potential to adversely affect threatened and endangered?	No	Yes	Yes

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Category	Performance Measure	No-Build	Alternative 1	Alternative 2
Preliminary Cost Estimate	Total Project Costs (including ROW and utilities)	N/A; standard operations and maintenance costs	\$3.49 billion	\$4.03 billion
	ROW acquisition and relocation costs	N/A	\$117.4 million	\$135.3 million

* Total stream impacts include both potential direct impacts (i.e., cut and fill) and indirect impacts (i.e., shading from bridges).

2.2.4. How was Alternative 1 refined?

Following the Level 3 screening and August 2024 public meetings, the Project Team made the following refinements to address public and stakeholder comments and further minimize impacts to resources:

- The limits of improvements along I-24/I-40 were extended west of Fesslers Lane and east of SR 155 (Briley Parkway) to better accommodate the merging of Choice Lane traffic into the general-purpose lanes.
- The Choice Lane was moved to the outside of the general-purpose lanes approaching the I-40/I-24 termination direct merge, and near the Elm Hill Pike, rather than the inside as originally proposed, to address operational concerns.
- Rather than Choice Lane access at East Thompson Lane, as originally proposed, the concept from Alternative 2 was incorporated that provides Choice Lane access at Briley Parkway. This addressed stakeholder concerns with potential conflicts with planned pedestrian/bicycle improvements on East Thompson Lane.
- Substandard bridges on I-24 are proposed to be replaced, which is driven not by the Choice Lanes but by existing bridge conditions and flooding issues at select locations.
- The Almadale Road Diverging Diamond Interchange (DDI) was added to the Project.
- I-24 mainline road widening was optimized to better utilize existing pavement, thereby decreasing impacts where feasible.
- The design was optimized to avoid direct impacts to eligible historic properties.
- The design was updated to allow heavy commercial vehicles (HCVs) to use the CLs.
- The two-lane Choice Lanes section was extended to the southern end of the project.

Following the public involvement meetings held in August 2024, TDOT held additional meetings on September 30, October 1 and October 2, 2025. These meetings were held to share the updates listed above, present updated environmental and traffic studies and design refinements, and collect public comments and answer questions about the proposed Project.

2.3. What alternatives are evaluated in this Environmental Assessment?

The following describes the No-Build and Build Alternatives retained for consideration and analysis in this EA.

2.3.1. What is the No-Build Alternative?

The No-Build Alternative has been retained for analysis to provide baseline conditions for comparison with the Build Alternative. Under the No-Build Alternative, there would be no improvements to operations on the I-24 Southeast corridor. However, fiscally constrained projects within the proposed Project area that are identified in the STIP would still be implemented. The No-Build Alternative would not meet the purpose and need of the proposed Project, and issues related to capacity and travel time would persist.

HOW WOULD THE NO-BUILD ALTERNATIVE AFFECT FUTURE TRAFFIC CONDITIONS?

The No-Build Alternative represents traffic conditions if the proposed Project did not occur but includes the existing and committed projects expected to be in place by the design year of 2052. Based on results from the GNRC traffic demand model, I-24 Southeast would be substantially impacted by capacity constraints from future population growth under the No-Build Alternative. Traffic delays would reach approximately three hours for westbound trips in the A.M. peak period under the No-Build Alternative. Additionally, along the I-40 section of the Choice Lanes corridor, there would be an increase in density during peak hours under the No-Build Alternative in the design year. More detailed information on how the No-Build Alternative would affect future traffic conditions is presented in the Traffic Analysis Report (**Appendix D**).

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2.3.2. What is the Build Alternative?

The Build Alternative 1A, also referred to as the Recommended Preferred Alternative in this EA, is the result of refinements to Alternative 1 described above. The Build Alternative would consist of:

- Construction of two new Choice Lanes in each direction on approximately 24.2 miles of I-24 Southeast, 1 mile on I-440 and 3.5 miles on I-40 (including I-24/I-40) and installing associated signage and fee collection infrastructure.
- Realigning and reconstructing approximately 17 miles of existing general-purpose or HOV lanes impacted on I-24 Southeast by Choice Lanes construction. The current number of general-purpose and HOV lanes would remain the same and all general-purpose lanes within the project limits would be resurfaced.
- Modifying existing interchanges and intersections and adding new interchanges to provide Choice Lanes access.²²
- Modifying or replacing existing bridges and adding new bridges where none currently exist.
- Constructing retaining walls and noise walls, as needed.

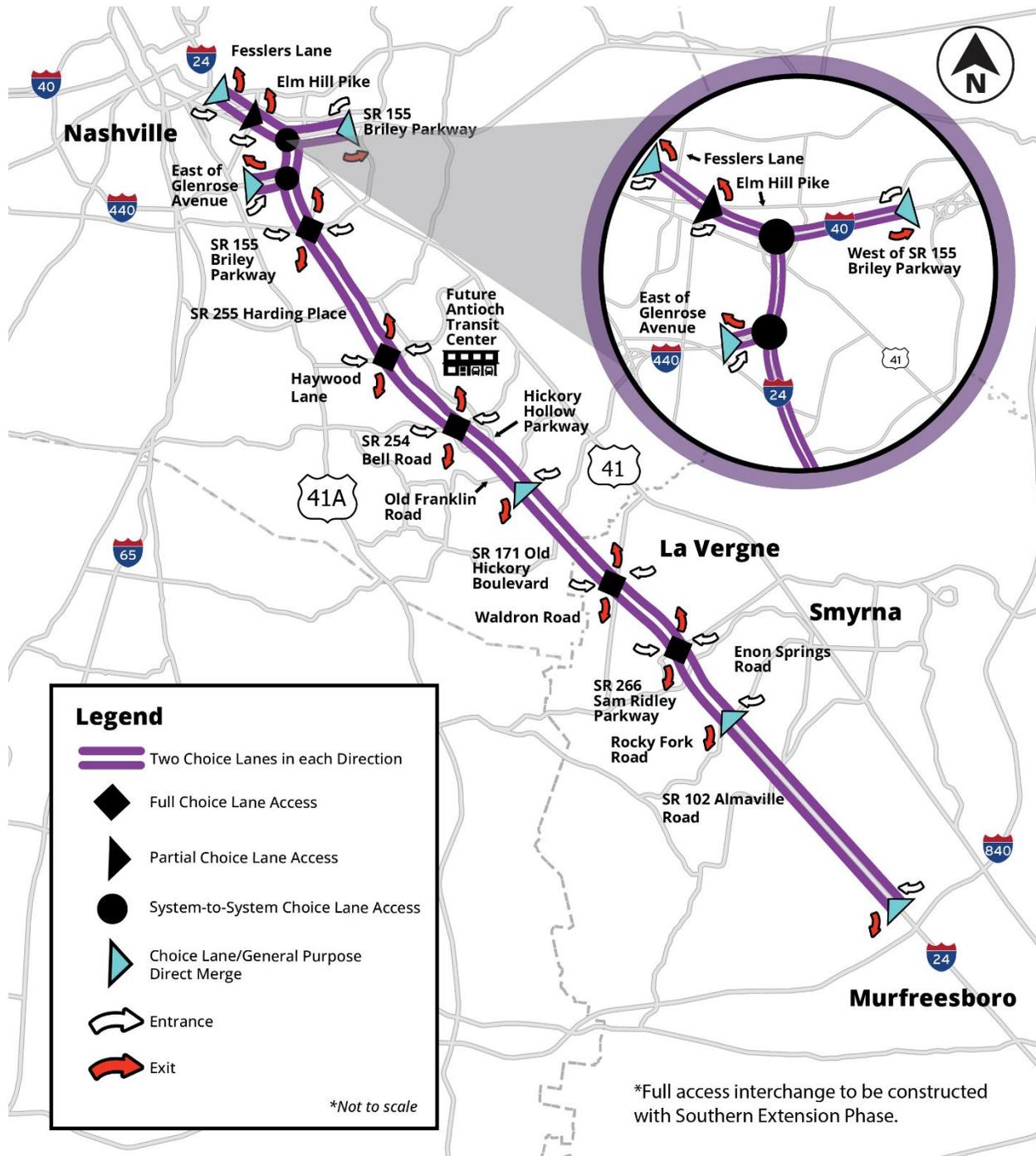
Figure 2-4 provides an overview of the proposed Build Alternative. As shown, the Build Alternative would propose 14 Choice Lanes access points along the I-24 Southeast corridor. These would consist of the following three types of access:

- System-to-System: Located where the Choice Lanes would have direct connections between the I-24, I-440 and I-40 corridors in all travel directions.
- Full/Partial: Provides full (all travel directions) or partial direct access to Choice Lanes through several interchanges that currently have general-purpose lane access and, at Elm Hill Pike, provides exclusive Choice Lanes access. Choice Lanes access would be provided on I-24 at the Briley Parkway, Haywood Lane, Bell Road, Waldron Road, and Sam Ridley Parkway general-purpose interchanges.
- Direct Merge: Allows drivers to directly merge to and from Choice Lanes into, or out of, general-purpose lanes without having to drive through an interchange. Direct merges would also be provided at entry and exit points on I-40, I-440, and I-840 prior to the system-to-system interchanges. A direct merge is also being proposed just East of the Old Franklin Road overpass and at the Rocky Fork/Enon Springs Road overpass along the mainline of I-24 Southeast.

Table 2-2 summarizes the primary Build Alternative components and the following sections describe these components in further detail. For detailed plans of the proposed Build Alternative that depict the Choice Lanes locations and configurations, access points and proposed ROW, refer to **Appendix E**.

²² The proposed Project includes operational improvements to the Almatville Road interchange. However, no Choice Lanes access points would be added at this location.

Figure 2-4: Build Alternative Overview²³



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²³ As shown in the Build Alternative Overview, the proposed Project includes operational improvements to the Almadillo Road interchange. However, no Choice Lanes access points would be added at this location.

Table 2-2: Build Alternative Overview

Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
<p>I-24/I-40 Alignment to West (Milepost [MP] 211–213)</p>	<p>I-24/I-40 Interchange at Elm Hill Pike (MP 212.5): New partial direct Choice Lanes access providing an alternative access point for entering eastbound Choice Lanes and exiting westbound Choice Lanes.</p> <p>I-24/I-40 Interchange at Fesslers Lane (MP 212): Fesslers Lane WB GP entrance ramp is modified to be 2 lanes, with one connecting to the outside of I-40 WB GP and the other connecting to the inside left lane of I-40 GP.</p>	<p>Elevated Choice Lanes on the outside between I-24 and Elm Hill Pike interchange towards downtown Nashville, which transition to at-grade under Elm Hill Pike. The two WB CL are at-grade under Elm Hill Pike and then split, with one lane continuing at-grade on the outside under Fesslers Lane and the other lane elevating over I-40 WB GP lanes to the center of I-40. The EB entrance to the Choice Lanes starts at Fesslers Lane.</p>	<p>Replaces Elm Hill Pike, Fesslers Lane, and Arlington Avenue EB and WB Bridges over I-24 / I-40, and I-24/I-40 mainline bridges over Brown’s Creek and Nashville & Eastern Railroad (NERR). Widens the I-24 mainline bridge over Fairfield Avenue. Adds five new bridges.</p>
<p>I-40 Alignment to East (MP 213–215)</p>	<p>N/A</p>	<p>Elevated Choice Lanes to the outside positioning the Choice Lanes terminus closer to exits at SR 155 (Briley Parkway) and Nashville International Airport. Choice Lanes terminate just west of the SR 155 (Briley Parkway) interchange. Westbound Choice</p>	<p>Replaces I-40 mainline bridge over I-24 within the I-24 at I-40 Interchange, the I-40 mainline bridge over Mill Creek and the Massman Drive bridge over I-40. Adds four new bridges.</p>

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Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
		Lane entry is split between the inside left lane of I-40 and the ramp from Briley Parkway.	
I-24 Mainline (between I-40 and I-440) (MP 52-53)	<p>I-40 Interchange (MP 52): Choice Lanes ramps (2 lane ramps) are elevated, mostly to the outside, and extend over Spence Lane to the east and Arlington Avenue to the west.</p> <p>I-440 Interchange (MP 53): Choice Lanes ramps (2 lane ramps) on the inside of I-440 to terminate with Choice Lanes on the inside just east of the I-440 interchange with Nolensville Pike.</p>	Elevated Choice Lanes in both directions to the west side of the mainline road.	Replaces South Lyle Lane, Foster Avenue, and Dortch Avenue pedestrian overpass bridges and the I-440 ramp over the I-24 at I-440 interchange. Widens the I-440 over CSX railroad/Glenrose Avenue mainline bridges. Also includes replacement of the existing I-440 eastbound general-purpose ramp to I-24 westbound general-purpose lanes. Adds 23 new bridges.

Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
I-24 Mainline (between I-440 and East Thompson Lane/Briley Parkway Interchange) (MP 52-54)	I-24 Interchange at Briley Parkway (MP 54): Modifies interchange to provide Choice Lanes access ramps within the existing interchange using a Choice Lanes plaza-style interchange. Constructs a new directional general-purpose flyover ramp.	To avoid potential ROW impacts from the addition of Choice Lanes to the historic Mill Creek Baptist Church Cemetery/Whitsett Cemetery, a set of reverse curves ²⁴ is proposed along I-24 eastbound. At this location, Choice Lanes would be elevated over the existing general-purpose lanes, and a minimum offset from the edge of the roadway would be provided in accordance with applicable AASHTO and FHWA standards. No sharp or short alignment shifts would occur along the roadway since Choice Lanes would be unidirectional at this location. This section of improvements would also realign Joplin Drive, a residential community street adjacent to I-24.	Replaces the I-24 mainline bridge over New Glenrose Avenue and the East Thompson Lane overpass bridge over I-24 and removes the existing loop ramps. Adds 12 new bridges.
I-24 Mainline (Briley Parkway to the railroad bridge south of	N/A	Elevated Choice Lanes to the outside, transitioning to at grade within the median just south of the CSX railroad bridge over I-24.	Replaces the Antioch Pike overpass bridge over I-24. Adds seven new bridges.

²⁴ A reverse curve is a section of the horizontal alignment of a highway in which a curve to the left or right is followed immediately by a curve in the opposite direction.

Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
Antioch Pike (MP 54-56)			
I-24 Mainline (between Harding Place and Haywood Lane Interchange) (MP 56-57)	I-24 Interchange at Haywood Lane (MP 57): Modifies interchange to provide Choice Lanes access using a Choice Lanes plaza-style interchange. Modifies the existing general-purpose interchange from a partial cloverleaf to a diamond interchange.	At-grade Choice Lanes in the median through the SR 255 (Harding Place) interchange with minor ramp adjustments. No Choice Lanes access or change in general-purpose lane access is proposed at SR 255 (Harding Place).	Replaces Harding Place bridge over I-24 and twin I-24 mainline bridges over Haywood Lane. Adds two new bridges.
I-24 Mainline (between Haywood Lane and Bell Road) (MP 57-59)	I-24 Interchange at Bell Road Interchange (MP 59): Modifies interchange to provide Choice Lanes access using new Choice Lanes direct connection ramps, providing connection over the CSX railroad to the proposed transit center at the mall. No major modification to the existing general-purpose diamond interchange, except for the bridge replacement.	At-grade Choice Lanes in the median initially, transitioning to the outside approximately 1 mile south of Haywood Lane.	Replaces Blue Hole Road overpass bridge over I-24, substandard I-24 mainline bridge over Mill Creek, including approximately 0.5 miles of roadway approach work to address flooding issues and replaces substandard I-24 bridge over SR 254 (Bell Road). This will include approximately 0.5 miles or roadway approach work to raise the grade of I-24 to achieve the required vertical clearance over SR 254 (Bell Road). Adds eight new bridges.
I-24 Mainline (between Bell Road and	N/A	Elevated Choice Lanes on the outside initially, transitioning to at grade in the median just west of	Replaces Hickory Hollow Parkway bridge over I-24 to accommodate the Choice Lanes in the median.

Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
Hickory Hollow Parkway) (MP 59-60)		the Hickory Hollow Parkway bridge.	
I-24 Mainline (between Hickory Hollow Parkway and Old Hickory Boulevard) (MP 60-62)	N/A	At-grade Choice Lanes in the median. No Choice Lanes access included at SR 171 (Old Hickory Boulevard) but provides a direct merge just south of the Old Franklin Road overpass.	Replaces overpass bridge at Old Franklin Road and Old Hickory Boulevard bridge over I-24 to accommodate Choice Lanes.
I-24 (between Old Hickory Boulevard and Waldron Road) (MP 62-64)	I-24 Interchange at Waldron Road (MP 64): Modifies the interchange to provide Choice Lanes access using a Choice Lanes plaza-style interchange. Removes the existing loop ramp and converts it to a general-purpose diamond interchange.	At-grade Choice Lanes in the median.	Replaces the Waldron Road bridge over I-24.
I-24 Mainline (between Waldron Road and Sam Ridley Parkway) (MP 64-66)	I-24 Interchange at Sam Ridley Parkway (MP 66): Modifies the interchange to provide Choice Lanes access using a Choice Lanes plaza-style interchange. Removes the existing loop ramp and converts it to a general-purpose diamond interchange.	At-grade Choice Lanes in the median.	Replaces the Sam Ridley Parkway twin bridges over I-24.

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Highway Segment	Interchanges	Choice Lanes Type and Description	Bridge Improvements and/or New Bridges
I-24 Mainline (between Sam Ridley Parkway and Almadale Road) (MP 66–70)	I-24 Interchange at Almadale Road (MP 70): No direct Choice Lanes access at the interchange but provides direct merges east and west of the interchange. Includes interchange improvements to construct a diverging diamond interchange.	At-grade Choice Lanes in the median. Includes direct merge in the median just southeast of Rocky Fork Road.	Replaces the I-24 mainline bridge over Rock Springs Road and the Rocky Fork Road overpass bridge over I-24. Replaces the I-24 mainline bridge over SR 102 (Almadale Road) to accommodate Choice Lanes.
I-24 Mainline (between Almadale Road and I-840) (MP 70–74)	N/A	At-grade Choice Lanes in the median, terminating approximately 1 mile northwest of the I-840 interchange ramps with a direct merge.	Replaces the twin I-24 mainline bridges over Stewart Creek and the Baker Road overpass bridge to accommodate Choice Lanes.

ROADWAY IMPROVEMENTS: CHOICE LANES, GENERAL-PURPOSE AND HOV LANES

Within the Project limits, I-24 Southeast, I-40 and I-440 would be expanded from eight lanes to 12 lanes. The Build Alternative would construct two 12-foot-wide Choice Lanes in each direction at grade to the inside and outside of the existing road alignment. In some areas, the Choice Lanes would be constructed within existing grass medians or would be widened to facilitate the construction of the Choice Lanes to the inside while pushing the general-purpose or HOV lanes to the outside. At-grade Choice Lanes would be separated by a 4-foot buffer with flexible delineators. **Figure 2-5** depicts the general proposed typical section for Choice Lanes on the inside of the mainline road, which would generally widen the existing 118-foot paved width between 48 feet and 82 feet. **Table 2-2** identifies where this typical section would be used by corridor segment.

Choice Lanes would also be constructed on the outside of the mainline road on an elevated structure where Choice Lanes conflict with general-purpose or HOV lanes or to minimize impacts to sensitive resources. Elevated Choice Lanes would primarily occur between the northern terminus of the proposed Project near downtown Nashville and SR 155 (Briley Parkway) to reduce interchange modifications and associated impacts, and in locations where the interstate intersects streams or floodplains. **Figure 2-6** and **Figure 2-7** depict the general typical section in areas where Choice Lanes would be on elevated structures and **Table 2-2** identifies where this proposed typical section would be used by corridor segment.

At the I-40 westbound terminus, the proposed Project would be constructed in two phases, which would include the Build Alternative and an Expanded Phase:

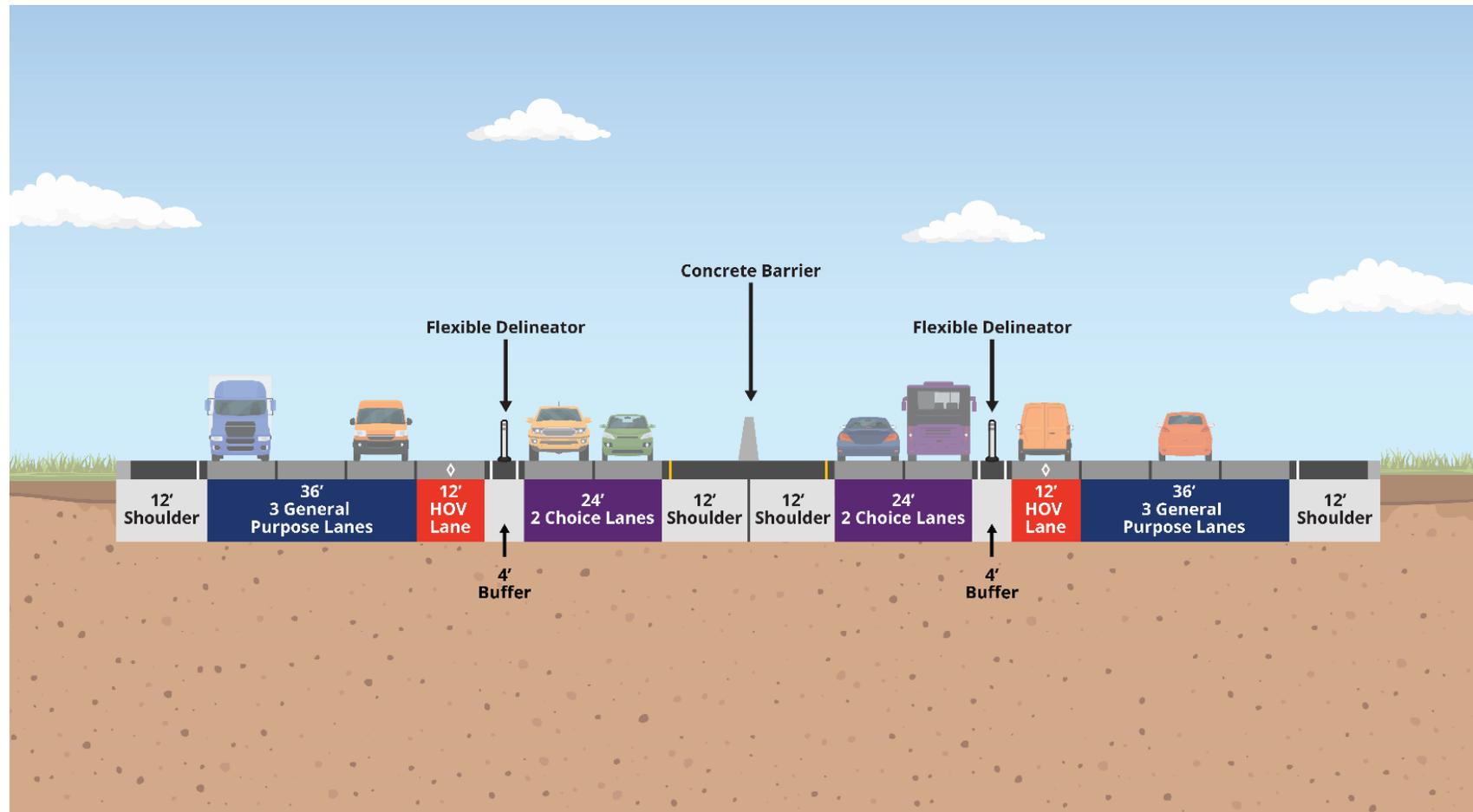
- The Build Alternative would implement a user-fee pricing system to limit volumes in the I-24 Choice Lanes to 50 percent of the demand for the I-40 westbound Choice Lane exit.
- The Expanded Phase would include a northern extension of the Choice Lanes from I-40/Fesslers Lane to north of the I-24/Shelby Avenue interchange in order to implement a future improvement for operational benefits. TDOT will initiate the preliminary design and environmental review for the northern extension prior to commercial close.

Refer to the Traffic Analysis Report in **Appendix D** for more details on the Build Alternative and the Expanded Phase.

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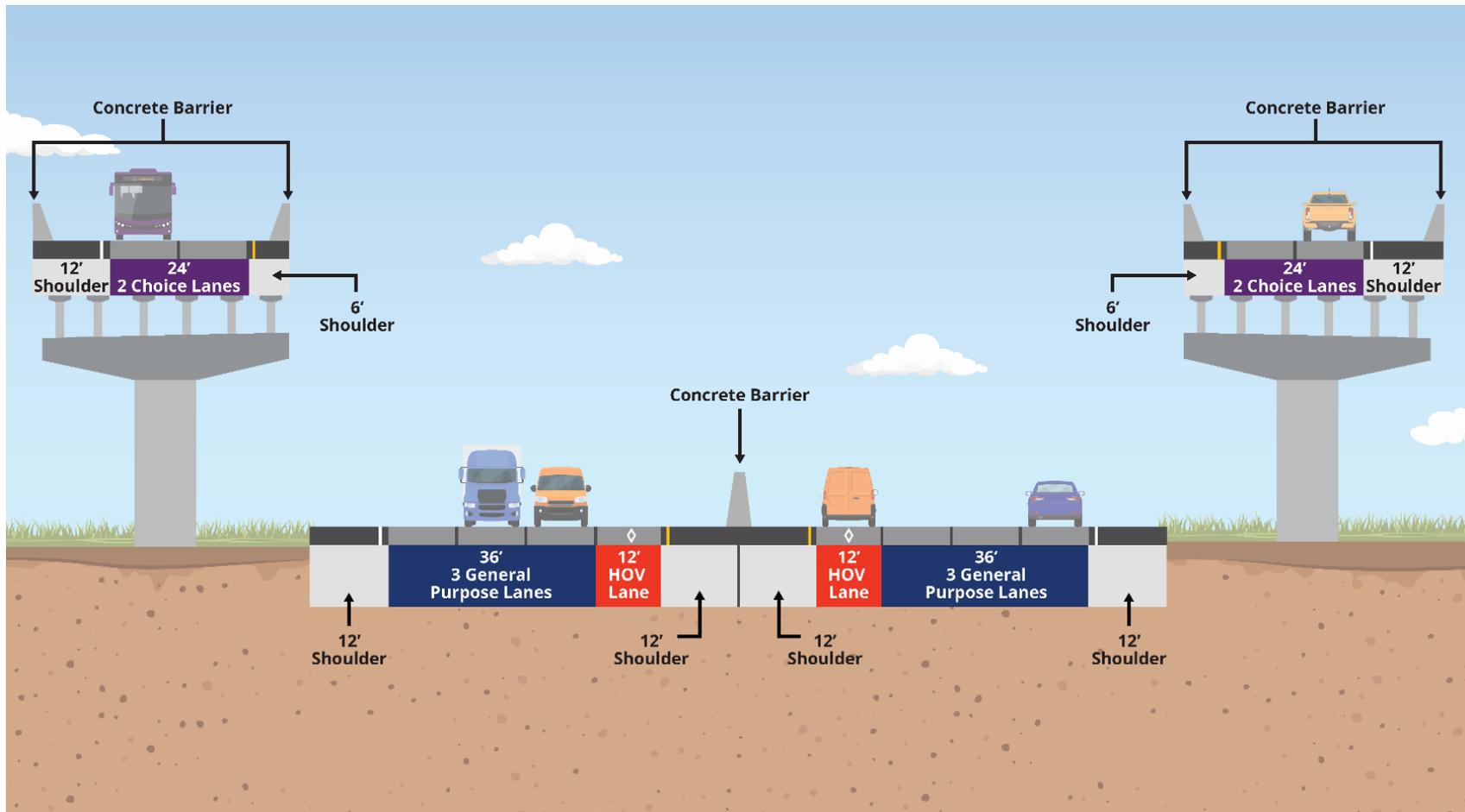
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Figure 2-5: Proposed Roadway Typical Section for Widening to the Inside of the Existing Mainline



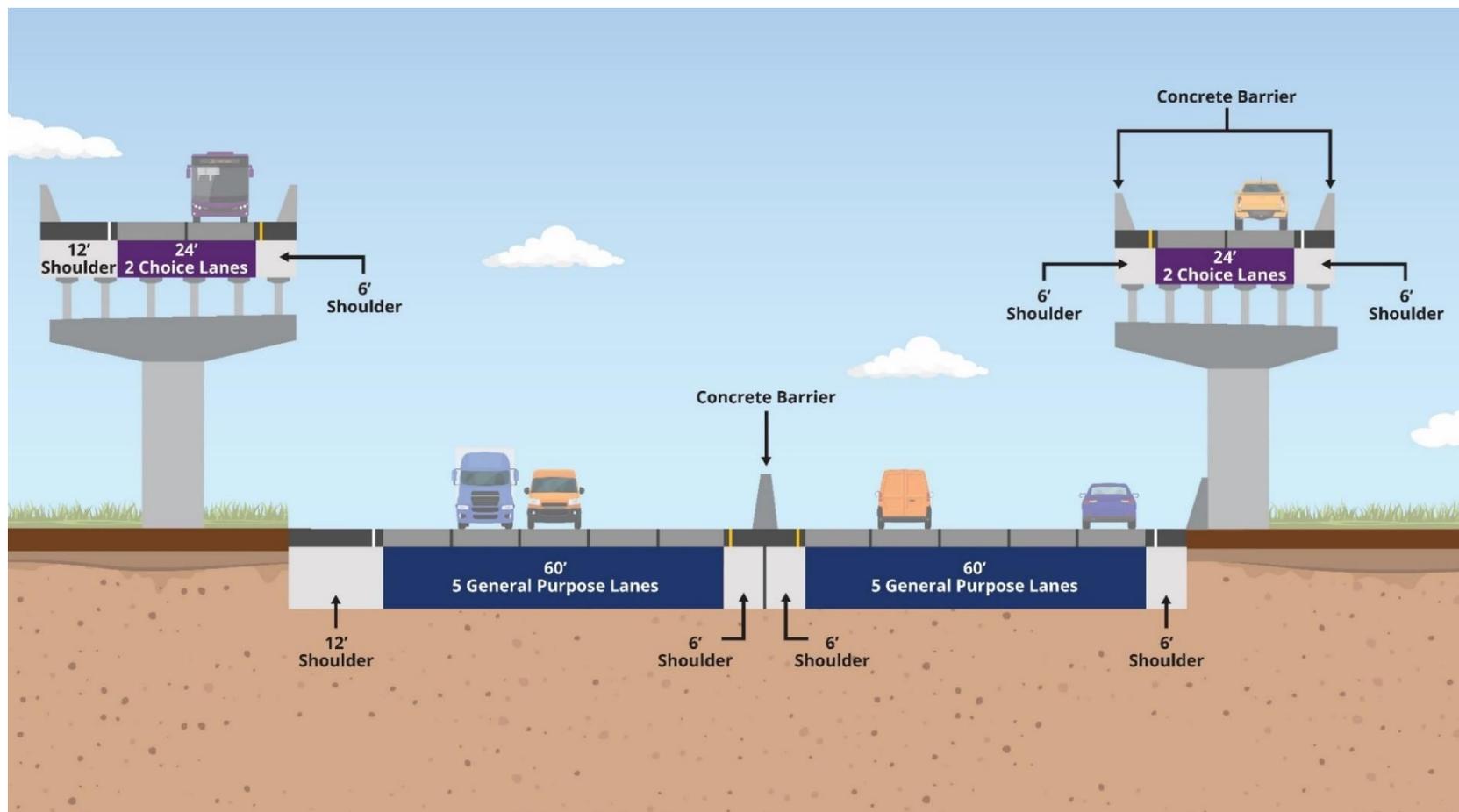
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Figure 2-6: Proposed Roadway Typical Section for Widening to the Outside of the Existing Mainline – Variation 1



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Figure 2-7: Proposed Roadway Typical Section for Widening to the Outside of the Existing Mainline – Variation 2²⁵



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²⁵ This variation in the Mill Creek Baptist Church Cemetery/Whitsett Cemetery area constitutes a design exception. FHWA defines a design exception as a design that deviates from the National Highway System design standards when warranted based on the conditions, context, and consequences of a proposed project. A design exception states the reasons for a specific deviation from an established standard for a specific highway feature and may also include features to mitigate any negative effects. In accordance with 23 CFR 625.3(b), this design exception is being documented in applicable AASHTO engineering and design documents prepared for the proposed project.

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In locations approaching the end of the proposed Choice Lanes, such as near exit points on I-40, I-440 and I-840, the two proposed Choice Lanes would taper to a single Choice Lane and then to only general-purpose lanes. In the locations where Choice Lanes are proposed at grade, existing general-purpose and HOV lanes would be reconstructed. The number of general-purpose and HOV lanes on the I-24 Southeast corridor would remain the same as existing conditions.

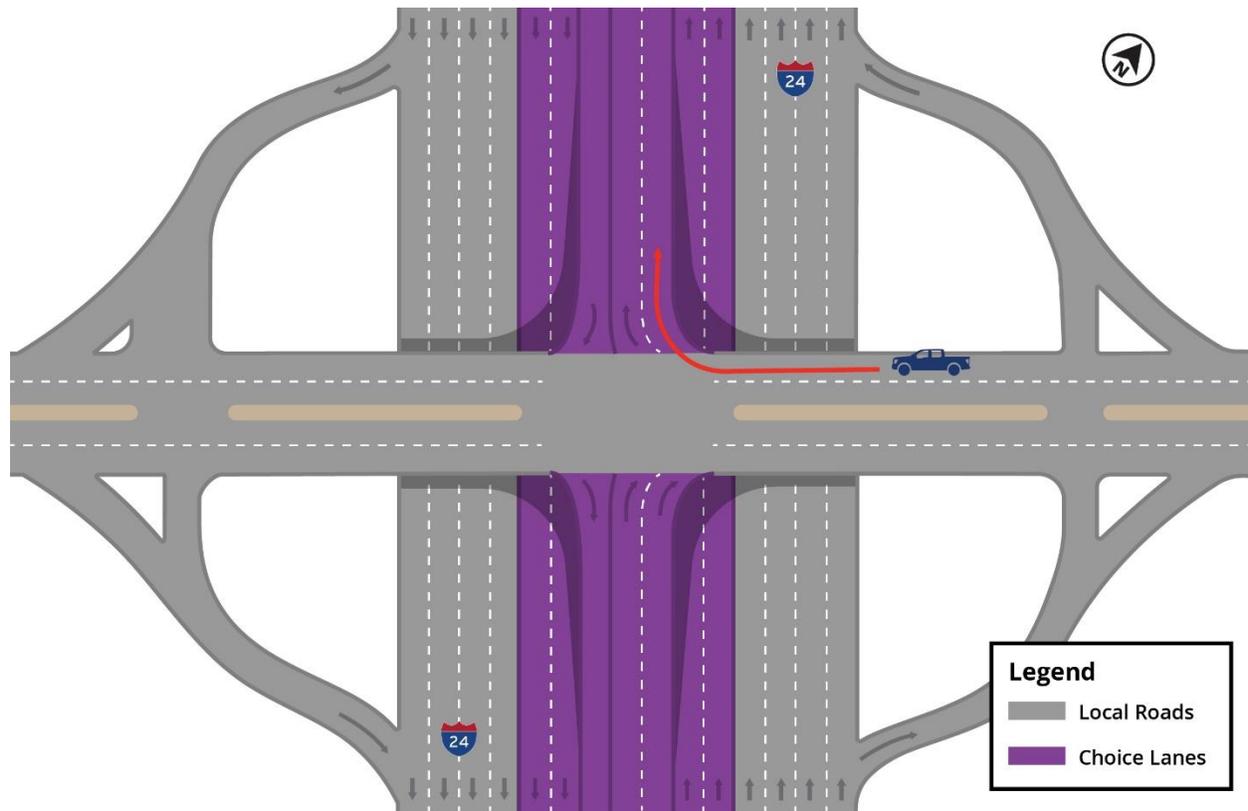
ACCESS AND INTERCHANGE MODIFICATIONS

The Build Alternative would construct one new I-24/I-40 Choice Lane exclusive interchange at Elm Hill Pike and modify five existing general-purpose interchanges along I-24 to add Choice Lanes access at SR 155 (Briley Parkway), Haywood Lane, SR 254 (Bell Road), Waldron Road and SR 266 (Sam Ridley Parkway). At the SR 102 (Almaville Road) interchange, operational improvements are proposed. However, no Choice Lanes access points are proposed at this location.

Interchange configurations would generally be plaza-style for the Choice Lanes access and diamond for general-purpose lane access. As shown in **Figure 2-8**, a plaza-style interchange would have a general-purpose interchange (diamond) with a Choice Lane entrance in the middle. This configuration would create three ramp intersections in a row (two general-purpose and one Choice Lane) along the arterial road, which would have stop control, such as a traffic signal, to safely manage traffic exiting and entering the Choice Lanes. Direct connection ramps are being proposed at the I-24/I-40 and I-24/I-440 interchanges.

Direct access to Choice Lanes would not be provided at SR 255 (Harding Place), Hickory Hollow Parkway, SR 171 (Old Hickory Boulevard) or SR 102 (Almaville Road).

Figure 2-8: Plaza Style Interchange



USER FEES AND ADVANCE SIGNAGE

A private-sector partner would design, build, finance, operate and maintain the Choice Lanes in exchange for the user fees collected from using the lanes. Parameters and policies governing user fees will be established by the Transportation Modernization Board, and the Choice Lanes operator (the private-sector partner) would set the user fee rates based on traffic conditions and usage. User fees would be collected electronically, using roadside equipment that records vehicle entry and exit points and a transponder installed in a vehicle that is linked to a payment account registered with TDOT. TDOT would manage user fee collection, and all user information would remain with the state. The private developer would not have access to user information. Public transit vehicles would not be charged to use the Choice Lanes.

The Choice Lanes would have a posted speed limit generally ranging from 55 to 70 mph and would use pricing to proactively manage demand and provide travel time improvements. Additionally, the Developer will be required to meet a minimum average operating speed of 45 mph during peak periods. The cost to use the Choice Lanes would change during the day based on how many vehicles are using them and the time of day, which is called dynamic pricing. Overhead and ground-mounted signs would provide advance notice of the user fee and designated entrance and exit points. User fee rates for

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trips on the Choice Lanes would be advertised on electronic message signs in advance of Choice Lanes access points. All Choice Lanes signage would be located and spaced according to FHWA's *Manual on Uniform Traffic Control Devices* standards.

TRAFFIC OPERATIONS

Traffic analyses assessed the Build Alternative's performance compared to the No-Build Alternative's performance in the design year of 2052 across various performance measures. An assumption that FHWA vehicle classes 1–10 would be permitted to use the Choice Lanes was incorporated into the analysis. These classes include vehicle types ranging from motorcycles and passenger cars to single trailer trucks with six or more axles. FHWA vehicle classes 11-13 would be restricted from using the Choice Lanes.²⁶

To complete the traffic analysis, corridor-level measures were used to evaluate the Project study area, whereas system-level measures were used to evaluate the overall efficiency of the broader transportation network, including I-24, I-40, I-440, I-840 and arterials within the Project study area. Summaries from the analysis on the Build Alternative's performance across both corridor-level measures and system-level measures are included below. For a detailed analysis of traffic operations, including details on the FHWA vehicle classifications, refer to the Traffic Analysis Report (**Appendix D**).

Corridor-level Performance

As explained above, projected changes in both capacity and travel time for the Build Alternative were measured at the corridor level.

To measure increases in capacity under the Build Alternative in the design year of 2052, the change in corridor throughput at critical locations along I-24 for both Choice Lanes and general-purpose lanes compared to the No-Build Alternative was measured, as shown in **Table 2-3**, **Table 2-4**, and **Table 2-5**. In addition to measuring improvements in capacity, travel time improvements were also measured at the corridor level for both Choice Lanes and general-purpose lanes along I-24 and I-40, as shown in **Table 2-4** and **Table 2-5**.

²⁶ FHWA Traffic Monitoring Guide, Appendix C Vehicle Types, https://www.fhwa.dot.gov/policyinformation/tmguidetmg_2013/vehicle-types.cfm.

Table 2-3: Build Alternative Changes in Vehicle Throughput along I-24

Direction	Time of Day	Change in Throughput
Westbound	A.M. Peak ²⁷	+27%
	P.M. Peak ²⁸	+9%
Eastbound	A.M. Peak	+13%
	P.M. Peak	+18%

Source: Traffic Analysis Report, January 2026

Table 2-4: Build Alternative Changes in Travel Time along I-24

Direction	Time of Day	Type of Lane	Change in Travel Time (Build GP/CL minus No-Build GP)		
			Max	Average	Min
Westbound	A.M. Peak ²⁷	General-purpose	143 minute decrease	72 minute decrease	10 minute decrease
		General-purpose (expanded) ²⁹	150 minute decrease	75 minute decrease	10 minute decrease
		Choice Lanes	161 minute decrease	79 minute decrease	10 minute decrease
		Choice Lanes (expanded)	161 minute decrease	79 minute decrease	10 minute decrease
	P.M. Peak ²⁸	General-purpose	25 minute decrease	20 minute decrease	12 minute decrease
		General-purpose (expanded)	33 minute decrease	27 minute decrease	12 minute decrease

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²⁷ For this traffic analysis, the A.M. peak period refers to 6 – 9 A.M.

²⁸ For this traffic analysis, the P.M. peak period refers to 3 – 6 P.M.

²⁹ Expanded areas refer to the area where the northern extension improvements would occur. Refer to **Section 2.3.2** for more details.

		Choice Lanes	31 minute decrease	26 minute decrease	12 minute decrease
		Choice Lanes (expanded)	No change	No change	No change
Eastbound	A.M. Peak	General-purpose	No change	No change	No change
		Choice Lanes	No change	No change	No change
	P.M. Peak	General-purpose	26 minute decrease	17 minute decrease	1 minute decrease
		General-purpose (expanded)	27 minute decrease	18 minute decrease	2 minute decrease
		Choice Lanes	31 minute decrease	21.5 minute decrease	2 minute decrease
		Choice Lanes (expanded)	No change	No change	No change

Source: Traffic Analysis Report, January 2026

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Table 2-5: Build Alternative Changes in Travel Time along I-40

Direction	Time of Day	Type of Lane	Change in Travel Time (Build GP/CL minus No-Build GP)		
			Max	Average	Min
Westbound	A.M. Peak ²⁷	General-purpose	10 minute decrease	2 minute decrease	9 minute increase
		General-purpose (expanded) ²⁹	11 minute decrease	6 minute decrease	1 minute decrease
		Choice Lanes	11 minute decrease	6 minute decrease	1 minute decrease
		Choice Lanes (expanded)	12 minute decrease	9 minute decrease	2 minute decrease
	P.M. Peak ²⁸	General-purpose	6 minute decrease	9 minute increase	17 minute increase
		General-purpose (expanded)	9 minute decrease	7 minute decrease	5 minute decrease
		Choice Lanes	10 minute decrease	8 minute decrease	6 minute decrease
		Choice Lanes (expanded)	11 minute decrease	9 minute decrease	6 minute decrease
Eastbound	A.M. Peak	General-purpose	No change	No change	No change
		Choice Lanes	No change	No change	No change
	P.M. Peak	General-purpose	No change	No change	No change
		Choice Lanes	No change	No change	No change

Source: Traffic Analysis Report, January 2026

Overall, the results for the I-24 section of the corridor indicate that the Build Alternative would improve travel times in both general-purpose lanes and Choice Lanes, with Choice Lanes offering free-flow travel along I-24. Additionally, the Expanded Phase would lead to improvements in both the general-purpose lanes and Choice Lanes.

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System-level Performance

Changes in vehicle throughput and delay were measured at the system level in the design year of 2052. Throughput was used to measure the total number of vehicles able to enter and exit the network during the three-hour analysis period while delay was used to measure the average time savings in hours per vehicle per year.

Across the broader transportation system, there would be an 8 percent increase in throughput in the A.M. peak period and a 15 percent increase in throughput in the P.M. peak period when comparing the Build Alternative to the No-Build Alternative. Additionally, there would be an increase in vehicle throughput of approximately 3,000 to 7,000 vehicles in A.M. and P.M. peak periods when comparing the No-Build Alternative to the Expanded Phase.

Additionally, in both A.M. and P.M. peak periods, there would be a 30 percent decrease in total delay under the Build Alternative and a 40 percent decrease in total delay under the Expanded Phase to the north. However, in the area of I-840 to the south, there would be some localized impacts with congestion showing for eastbound users in the design year (2052). The opening year shows nearly free-flow travel time along I-840. By the design year, travel times along I-840 EB are temporally shifted due to improvements on I-24 resulting in users no longer being in congested traffic. The peak Build travel times on I-840 are still shown to be lower than the No-Build peak travel times. Furthermore, the Build travel times show better recovery within the peak period than the No-Build travel times.

Overall, the results of the system-level analyses indicate that the Build Alternative would increase capacity and improve travel times within the broader transportation system in the design year. Design year unserved demand would be reduced by more than 1 percent in the A.M. peak period and more than 45 percent in the P.M. peak period under the Build Alternative when compared to the No-Build Alternative. The Expanded Phase would reduce the unserved demand further, to 3 percent in the A.M. peak period and 53 percent in the P.M. peak period.

BRIDGES AND WALLS

The Build Alternative would replace 37 bridges, widen 3 bridges and construct 55 new bridges. The majority of the proposed bridge replacements would be required to accommodate the construction of Choice Lanes; however, the bridges at the following locations would be replaced because of their substandard condition:

- I-24 over Mill Creek
- I-24 over SR 254 (Bell Road)
- I-40 over Nashville and Eastern Railroad
- I-40 over Browns Creek
- Fesslers Lane over I-40

- Arlington Avenue over westbound I-24/I-40
- Arlington Avenue over eastbound I-24/I-40
- I-40 over I-24
- Massman Drive over I-40
- I-440 Ramp over I-24 Interchange
- I-24 over New Glenrose Avenue
- Antioch Pike over I-24
- Blue Hole Road over I-24

Bridge widening would be required to accommodate the Choice Lanes, while new bridges would be constructed for locations with elevated Choice Lanes (**Figure 2-6** and **Figure 2-7**). For proposed bridge replacements and new bridges, the bridge types would be determined in future design stages.

In addition, 77 retaining walls totaling approximately 18.9 miles in length would be constructed to minimize ROW and environmental impacts and, in some instances, extend the width of the road. The walls would vary in length between approximately 85 feet and 12,525 feet. The type of wall would vary based on site-specific constraints, such as soil conditions and adjacent sensitive resources, and will be determined in future design stages. Additionally, 30 noise abatement barriers have been recommended as preliminarily feasible and reasonable; however, a final barrier analysis will be completed during the final design process.

Retaining walls can help minimize impacts to the surrounding landscape by allowing the proposed grade to tie into the existing ground surface more quickly, which reduces the overall permanent impact footprint.

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2.3.3. How would the Build Alternative Increase Capacity?

The proposed project would address growing congestion by increasing roadway capacity through the implementation of a managed lanes system that offers drivers travel choices. By providing additional lanes that operate under dynamic pricing, the system allows users to opt into a faster travel option when needed, while preserving general-purpose lane availability.

2.3.4. How would the Build Alternative Improve Travel Times?

Long travel times would be addressed along the I-24 Southeast corridor by providing managed lanes as additional travel options. As documented in previous planning efforts and traffic forecasting data, simply adding general-purpose lanes is not a sustainable solution to the region’s long-term transportation challenges. Traffic congestion and the inability to effectively manage demand along I-24 are expected to worsen due to rapid population growth and expanding economic opportunities.

The proposed managed lane system offers a travel time advantage through dynamic pricing and demand management. A key component of this strategy is the enforcement of a minimum speed, established through contractual agreements between TDOT and the Developer.³⁰ To maintain this minimum speed, the Developer will implement dynamically priced user fees—adjusted based on real-time traffic volumes and speeds—to regulate the number of vehicles entering the lanes. This approach would help control congestion by maintaining travel times for users. By shifting a portion of demand to the managed lanes, the system not only improves travel times for those who opt in but also alleviates congestion in the general-purpose lanes, enhancing mobility across the entire corridor.

³⁰ A Developer is a private entity who is contracted with the owner (i.e., TDOT) who is responsible for the delivery of the projects that is traditionally held by public agencies.

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3. POTENTIAL EFFECTS

As briefly discussed in **Chapter 1**, research and field surveys have been conducted to identify resources along the proposed Project corridor (I-24 Southeast) and within the established ETSA³¹ and ETSA buffers (see **Chapter 1**. Based on the Build Alternative (also referred to as the recommended Preferred Alternative, see **Chapter 2**), potential effects to those identified resources have been assessed and are described throughout this **Chapter 3**. **Table 3-1** contains the Summary of Potential Impacts.

Individual resources have been also evaluated based on the No-Build Alternative in the sections below. The No-Build Alternative would result in no direct impacts to any resource. However, as previously noted, if the proposed Project is not built, the purpose and need would not be achieved.

³¹ As a result of design refinements for the recommended Preferred Alternative 1A, additional surveys and reporting for the technical studies and memos were conducted for an expanded ETSA. Field surveys for waters, species, historic and archaeological resources were completed in late 2024, and spring/summer 2025. References to the expanded ETSA and supporting technical studies are made throughout where applicable.

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Table 3-1: Summary of Potential Direct Impacts

SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Social Environment				
Land Use	34.9 acres to be converted for transportation use, all parcels currently zoned for development	Not Applicable (N/A)	No significant adverse effects	None
Economic Impacts	Employment, increased revenue from user fees	N/A	No significant adverse effects	None
Community Facilities	No impacts	N/A	None	None
Recreational Section 4(f)/6(f)	No impacts	N/A	None	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Visual Resources	Temporary and permanent visual impacts to travelers, residents and businesses	Pending ongoing public input. Potential for landscaping and vegetative barriers, aesthetic treatments	No significant adverse effects	None
Relocations	51 total: 18 commercial and 33 residential (29 single-family units and 2 multi-family units accounting for 4 displacements)	Relocation assistance in accordance with federal and state requirements	No significant adverse effects	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Physical Environment				
Air Quality	Meets conformance requirements; minor increase in Mobile Source Air Toxics (MSAT), but lower than existing conditions	Best Management Practices (BMPs) to minimize temporary construction-related impacts	No significant adverse effects	None
Noise	3,281.54 impacted receptors	30 Noise abatement barriers are preliminarily feasible and reasonable; nighttime/weekend construction work restrictions for temporary impacts	No significant adverse effects	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Hazardous Materials	7 high-risk, 17 low-risk properties expected to require full or partial parcel acquisition	Due to the type of Phase I HazMat resources identified, the Project Team, including the Developer, will follow TDEC’s Division of Remediation guidance and rules pursuant to Chapter 0400-15-01 - Hazardous Substance Remedial Action and TDEC’s Division of Underground Storage Tanks guidance and rules pursuant to Chapter 0400-18-01 – Underground Storage Tank Program. Additionally, the Project Team, including the Developer, will also follow TCA 68-212 Part 2 of the Hazardous Waste Management Act of 1983 and TCA 68-215 Part 1 of the Tennessee Petroleum Underground Storage Tank Act.	No significant adverse effects	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Geology/Karst Formation Sinkholes/Cave	No Impacts	Class V Injection Well Permit	None	None
Mineral Resources	No impacts	N/A	None	None
Construction/Utilities	Utility relocations may be required; temporary access, including temporary detours, to businesses and residences may also be required during construction	Ongoing and advanced communications with stakeholders and public would be provided prior to detours/lane closures; disruptions to utilities services would be notified in advance	No significant adverse effects	None
Railroads	No impacts	Coordination with RR owners will be conducted for final design and construction agreements will be executed that outline RR requirements during construction of the project	None	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Natural Environment				
Water Quality	No further water quality impairment to 303(d) listed streams; some stormwater runoff anticipated	Erosion and Sediment Control Plan (ESCP), Stormwater Pollution Prevention Plan (SWPPP), National Pollutant Discharge Elimination System (NPDES) Permits, TDEC Section 401 Water Quality Certification/Aquatic Resource Alteration Permit (ARAP)	No significant adverse effects	None
Wetlands & Waters of the United States (WOTUS)	36 wetlands: 4.05 Acres of permanent fill in wetlands; 59 streams: 12,282 linear feet of impacts to streams	USACE Section 404 Permit and mitigation requirements	Adverse effects (mitigated)	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Floodplains	Subject to final hydrologic study results	BMPs will be established upon completion of the final design; if no-rise certification cannot be obtained, a CLOMR/LOMR will be completed.	No significant adverse effects; no-rise certification anticipated	None
Natural Habitats and Protected Species	40 species within the ETSA that have protection status, 6 of which have federal listing status	Time of Year Restrictions (TOYR) including in-water work restrictions would be in accordance with TDOT and FHWA requirements; water quality BMPs would also be implemented during construction; additional mitigation as required pending Biological Opinion.	May affect, likely to adversely affect Nashville crayfish	None
Farmland	No impacts	NA	None	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Cultural Environment				
Historic Resources	17 National Register of Historic Places (NRHP) eligible	Draft MOA in progress; will be completed prior to NEPA Decision.	Adverse (visual) effect on Mill Creek Baptist Church Cemetery/ Whitsett Cemetery and Rogers Manufacturing Plant (mitigated)	None
Archaeological Resources	2 NRHP potentially eligible and 2 NRHP eligible sites	Archaeological monitoring	No impacts	None

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SUMMARY OF DIRECT RESOURCE IMPACTS BUILD ALTERNATIVE				NO-BUILD ALTERNATIVE IMPACTS
RESOURCE	ANTICIPATED RESOURCE IMPACTS	BEST MANAGEMENT PRACTICES/MITIGATION (IF APPLICABLE)	EFFECTS DETERMINATION (IF APPLICABLE)	
Preliminary Costs Estimate				
Total Project Costs (including ROW and Utilities)		\$4.5 Billion		N/A; standard Operations and Maintenance costs
Right of Way Acquisition and Relocations Costs		\$245 Million		N/A

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3.1. Would the proposed Project affect Socioeconomics and Communities?

This section discusses how the proposed Project would affect the existing community, including current and planned land use, community facilities and recreational resources. Additional information related to socioeconomics and community impacts is included in the Socioeconomic Conditions Technical Memorandum (**Appendix F**) and the Land Use and Community Facilities Technical Memorandum (**Appendix G**).

Demographic and Population Characteristics

The proposed Project is located within Davidson and Rutherford counties. **Table 3-2** shows population trends at the county level using data from the U.S. Decennial Census from 2000, 2010 and 2020. County-level population growth projections are provided by the University of Tennessee and are estimated through 2045.³² The population of both counties grew between 2000 and 2020, with the largest growth rate in Rutherford County. Population growth is expected to continue through 2045 for both counties. Rutherford County is expected to see the population expand by approximately 1.6 times its 2020 level over the next 25 years.

The U.S. Census Bureau's 2024 1-Year Estimates³³ show that 442,511 of the 596,730 individuals (16 years and older) who live in Davidson County are employed. In Rutherford County, there are 294,430 residents over the age of 16, of whom 215,175 are employed. Of the 418,280 employed residents within Davidson County, 352,969 residents work in the same county. Of the 201,353 employed residents within Rutherford County, 133,448 residents work in the same county.³⁴ Data from the GNRC shows anticipated employment growth in Davidson and Rutherford counties (**Table 3-3**). By 2045, the number of jobs in Davidson County is projected to increase to 864,682 (35.4 percent) while employment in Rutherford County is expected to rise to 272,170 (58.7 percent). Overall, the combined two-county employment count is expected to grow from 810,304 in 2017 to 1,136,852 in 2045 (a 40.3 percent change).

³² [Tennessee State Data Center and Boyd Center for Business and Economic Research - 2020 to 2070 Tennessee Population Projections](#), n.d., Accessed December 2023.

³³ [U.S. Census Bureau. "Selected Economic Characteristics." ACS 1-Year Estimates Data Profiles, Table DP03, 2024](#), Accessed October 2025.

³⁴ [U.S. Census Bureau. "Sex of Workers by Place of Work--State and County Level." ACS 1-Year Estimates Subject Tables, Table B08007, 2024](#), Accessed October 2025.

Table 3-2: Population Estimates and Projections to 2045 for Davidson County and Rutherford County

REGION	POPULATION					PERCENT CHANGE (%)		
	Year(s)	2000	2010	2020	2045	2000-2010	2010-2020	2020-2045
Davidson County		569,891	626,681	715,884	832,218	10%	14%	16%
Rutherford County		182,023	262,604	341,486	546,129	44%	30%	60%

Source: U.S. Census,^{35, 36, 37} University of Tennessee.³⁸

Table 3-3: Jobs Located in Davidson and Rutherford Counties (2017 and 2045)

GEOGRAPHY	EMPLOYMENT (2017)	EMPLOYMENT (2045)	PERCENT CHANGE (%)
Davidson	638,807	864,682	35.4
Rutherford	171,497	272,170	58.7
Total	810,304	1,136,852	40.3

Source: Greater Nashville Regional Council.³⁹

Special Populations

Special population demographics and characteristics considered during the development of the proposed Project are included in **Table 3-4**, including age, disability, education and health. These demographics were reviewed to enhance the proposed Project’s ability to protect qualified individuals from discrimination based on Title VI. Davidson and Rutherford counties both have populations with younger residents, fewer disabilities, more years of education and lower rates of health conditions when compared to the entire state. The proposed Project would be constructed according to all applicable Title VI statutes. A detailed description of the special population demographics and characteristics for

³⁵ U.S. Census Bureau – United States Summary: 2000, Population and Housing Unit Counts, 2004, Accessed March 2024.

³⁶ U.S. Census Bureau. "RACE." Decennial Census, DEC Redistricting Data (PL 94-171), Table P1, 2020, Accessed December 2023.

³⁷ U.S. Census Bureau. "RACE." Decennial Census, DEC National Redistricting Data, Table P1, 2010, Accessed December 2023.

³⁸ Tennessee State Data Center and Boyd Center for Business and Economic Research - 2020 to 2070 Tennessee Population Projections, n.d., Accessed December 2023.

³⁹ Greater Nashville Regional Council. "Projected Total Employment." GNRC 2045 Regional Demographic Forecasts Dashboard, Accessed November 2024.

Davidson County, Rutherford County and the state of Tennessee can be found in the Socioeconomic Conditions Technical Memorandum (**Appendix F**).

Table 3-4: Regional Demographic and Population Characteristics for Tennessee, Davidson County and Rutherford County

SOCIAL CHARACTERISTIC		TENNESSEE	DAVIDSON COUNTY	RUTHERFORD COUNTY
Age	Under Age 18 (%) ⁴⁰	21.8	20.5	24.4
	Age 65 and Above (%) ⁴¹	17.6	13.3	11.9
Education ⁴²	High School Degree, GED, or Alternative Credential (%)	90.6	92.2	92.9
	Bachelor’s Degree or Higher (%)	32.4	51.2	36.6
Literacy ⁴³	At or Below Level 1 (%)	22	22	17
	At Level 2 (%)	38	32	35
	At or Above Level 3 (%)	40	47	48
Disability ⁴⁴	Non-institutionalized population with a disability (%)	14.8	10.4	13.5
Children’s Health and Safety ⁴⁵	Current asthma condition among children aged 0-17 (%)	8.6	N/A	N/A

There are no anticipated direct impacts to healthcare facilities or other known services to the disabled. Community facilities, including those serving children specifically, such as educational facilities, daycares and social services, among other community facilities such

⁴⁰ U.S. Census Bureau. "Population Under 18 Years by Age." ACS 1-Year Estimates Detailed Tables, Table B09001, 2024, Accessed October 2025.

⁴¹ U.S. Census Bureau. "Age and Sex." ACS 1-Year Estimates Subject Tables, Table S0101, 2024, Accessed October 2025.

⁴² U.S. Census Bureau. "Educational Attainment for the Population 25 Years and Over." ACS 1-Year Estimates Detailed Tables, Table B15003, 2024, Accessed October 2025.

⁴³ A full description of the PIAAC literacy levels is available on the National Center for Education Statistics website (<https://nces.ed.gov/surveys/piaac/measure.asp>). Accessed October 2025.

⁴⁴ U.S. Census Bureau. "Selected Social Characteristics in the United States." ACS 1-Year Estimates Data Profiles, Table DP02, 2024, Accessed October 2025.

⁴⁵ Child and Adolescent Health Measurement Initiative. 2022-2023 National Survey of Children’s Health (NSCH) data query, Accessed October 2025.

as hospitals and trails, were identified within 500 feet of the ETSA, but would not be impacted by the proposed Project. A comprehensive summary of community facilities and a map of locations can be found in the Land Use and Community Facilities Technical Memorandum (**Appendix G**). Impacts to community facilities are summarized under **Section 3.1.1**.

User Fee Impacts on Travelers

Previous studies have modeled traffic and revenue impacts based on various user fee rates but assumed a minimum trip cost of \$1 (2024 dollars) for the length of the corridor. Keeping the lanes below approximately 1,650 vehicles per hour per lane would be needed to maintain the minimum speeds expected for a price-managed lanes facility. Drivers utilizing Choice Lanes would expect to incur greater costs during peak congestion hours; however, expected time savings relative to general-purpose travel would increase as well. During peak congestion, Choice Lane users are estimated to complete a full-length trip along the corridor 61% faster (20 minutes vs. 51 minutes) than those using general-purpose lanes only. Estimated time savings, and user fees, would be less significant outside peak hours.

Use of Choice Lanes, and the associated costs incurred from user fees, would always be an individual’s choice, and access to general-purpose lanes would remain unchanged, offering drivers flexibility in their travel. Importantly, use of Choice Lanes would divert traffic away from, and thereby reduce congestion in, general-purpose lanes. This would result in faster travel in the general-purpose lanes as compared to the No-Build Alternative, and come with no additional incurred cost to the general-purpose lanes traveler.

3.1.1. Would Land Use and Community Facilities be affected?

Land Use

The Land Use and Community Facilities Technical Memorandum (**Appendix G**) was developed to understand existing land uses in the Study Area, along with recent and expected changes in land use based on regional plans and zoning. For the purposes of this section, the ETSA plus a 500-foot buffer is referred to as the “Study Area.” Current land use depicts how land is actively being used and what activities may occur on a property while zoning provides a direction or vision for the use of a given area of land. Existing land use within the Study Area is a mix of urban area, developed land of varying intensity (ranging from open space to high-intensity use), deciduous forest and some isolated areas of agricultural land. Land use types within the Study Area are included in **Table 3-5** for Davidson County and **Table 3-6** for Rutherford County, and are shown in **Appendix G**. Additional tables and figures describing zoning designations for the Project Study Area can be also found in **Appendix G**.

The current land use designations and zoning classifications within the Study Area convey the increasing prevalence of low-density development from the Nashville Metro Area through the I-24 Southeast corridor into Rutherford County. Rutherford County’s

availability for development can be found in areas near I-840, where current land uses in the area are farmland and/or vacant rural land but are zoned for residential development. With population increases over time, these rural agricultural areas would likely be converted into their zoned use, such as residential and commercial.

I-24 Southeast corridor land use and growth plans were analyzed in the Land Use and Community Facilities Technical Memorandum (**Appendix G**), including the *NashvilleNext*,⁴⁶ Davidson County’s growth plan and *Rutherford County 2035 Comprehensive Plan*.⁴⁷

Future land use in Davidson County shows a plan to convert a large area of space along I-24 between Old Franklin Road and SR 171 (Old Hickory Boulevard) into residential, commercial and mixed-use areas. Much of the existing residential space along I-24 Southeast is planned to be preserved, with industrial and other uses being converted into residential space.

Future land use in Rutherford County shows the conversion of industrial land into residential and commercial space at the I-24/Lee Victory Parkway area. Additionally, residential space near I-840 is expected to be converted into a mix of residential and commercial areas near an existing Planned Unit Development (PUD).⁴⁸

Table 3-5: Davidson County Land Use Types within the Study Area

LAND USE TYPE	NUMBER OF DISTRICTS	PERCENT OF DISTRICTS (%)	LAND AREA OF DISTRICTS (SQ. MI)	LAND AREA OF DISTRICTS (%)
Residential	70	40.46	2.7	40.1
Agricultural	8	3.47	0.5	7.7
Commercial	41	23.7	1.1	16.4
Industrial	13	7.51	0.9	13.5
Mixed Use	26	15.02	1.2	18.1
Office	2	1.17	0.01	0.2
Other	13	8.67	0.3	4.0
Total	173	100	6.71	100

Source: *Metro Nashville Government ArcGIS REST Server Zoning View Layer*. Accessed September 2025. Land use determinations were performed using data from the Zoning View layer as well as visual verification utilizing Google Maps.

⁴⁶ [NashvilleNext](#). Accessed March 2024.

⁴⁷ [Rutherford County Comprehensive Plan](#). Accessed March 2024.

⁴⁸ [NashvilleNext](#). Accessed May 2024.

Table 3-6: Rutherford County Land Use Types within the Study Area

LAND USE TYPE	NUMBER OF DISTRICTS	PERCENT OF DISTRICTS (%)	LAND AREA OF DISTRICTS (SQ. MI)	LAND AREA OF DISTRICTS (%)
Residential	22	26.5	1.6	55.17
Agricultural	3	3.6	0.05	1.72
Commercial	36	43.37	0.5	17.24
Industrial	15	18.1	0.6	20.7
Mixed Use	1	1.2	0.1	3.45
Office	0	0	0	0
Other	6	7.23	0.05	1.72
Total	83	100	2.9	100

Source: [Rutherford County Government ArcGIS REST Server CAMA Parcels Layer](#):. Accessed September 2025. Land use determinations used data from the CAMA Parcels layer as well as visual verification utilizing Google Maps.

The Build Alternative would require the acquisition of approximately 34.9 acres of land outside of existing ROW and directly convert existing non-transportation land uses to transportation uses. The majority of the land to be acquired is currently of commercial/office use, with other uses including residential, industrial and exempt/other. Anticipated conversions of land to transportation purposes would be compatible with existing uses and would be consistent with regional and local land use plans. Relocations are described in **Section 3.3**. Reasonably foreseeable land use effects are described in **Section 3.12**.

The No-Build Alternative would not result in impacts to land use.

Community Facilities

Community facilities and services include assisted living facilities, grocery stores, employment centers, places of worship, public parks and recreational facilities, educational facilities, social service and healthcare facilities and public safety facilities such as police, fire and rescue. There are 25 community facilities within or partially within the ETSA: 12 cemeteries, 4 places of worship, 4 public parks or recreation areas, a shared community art studio and workspace, a foster care services facility, 2 grocery stores and the El Salvador Consulate General. There are an additional 68 community facilities located within the overall Study Area including places of worship, public parks, schools, grocery stores, medical centers, a fire station, a police station, government facilities, social services and employment centers or labor unions. A complete list and maps of community facilities within the ETSA and Study Area can be found in **Appendix G**.

Although some travel pattern changes resulting in improved access would be experienced, the Build Alternative would not impact community facilities.

The No-Build Alternative would not result in impacts to community facilities.

3.1.2. Would any Section 4(f)/6(f) resources be affected?

49 USC 303 requires the evaluation of the potential use of publicly owned parks, recreational areas, wildlife and waterfowl refuges and public or private historic sites for transportation projects. Under Section 4(f) of the USDOT Act of 1966, a use occurs when land from a Section 4(f) property is incorporated into the transportation system, or when proximity impacts substantially impair the features, activities or attributes that qualify the property for protection under Section 4(f).⁴⁹ Section 6(f) resources are those that have received funding from the Land and Water Conservation Fund Act under the State Assistance Program and require replacement in-kind if impacted by a project.⁵⁰ No Section 6(f) resources are within or near the proposed Project ETSA.

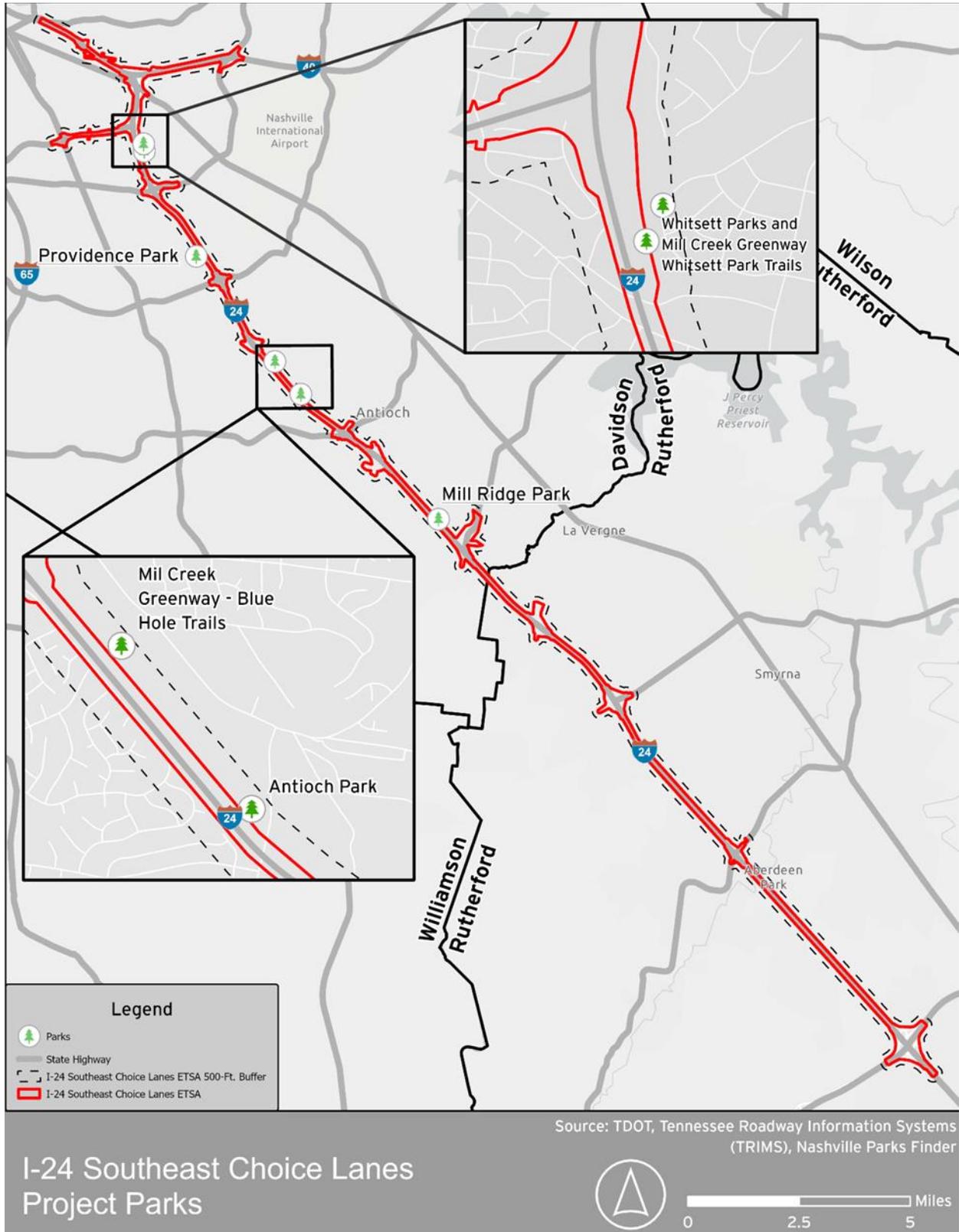
As shown on **Figure 3-1**, six recreational Section 4(f) resources are located within 500 feet of the proposed Project ETSA; five of which partially overlap the ETSA. Refer to the Section 4(f)/Section 6(f) Recreational Resources Technical Memorandum (**Appendix H**) or detailed descriptions of these recreational resources.

The Build and No-Build Alternatives would not permanently incorporate recreational Section 4(f) resources into a transportation facility or temporarily occupy them. With the Build Alternative, elevated Choice Lanes would be partially visible from Whitsett Park and the Whitsett Park Trails associated with the Mill Creek Greenway Trails. However, the Build Alternative would not substantially impair the protected features, activities or attributes of these resources. A detailed analysis of the eligible historic resources protected under Section 4(f) is in **Section 3.10**.

⁴⁹ [23 CFR 774, 4\(f\) Resources](#); accessed September 2025.

⁵⁰ [36 CFR 59, 6\(f\) Resources](#); accessed September 2025.

Figure 3-1: Overview of Recreational Section 4(f) Resources in the Project Study Area



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3.2. Would the proposed Project affect Visual Resources?

A Visual Impact Assessment (VIA) was performed for the proposed Project.⁵¹ The VIA was based on field observations, public involvement meetings, a Visual Preferences Survey, review of local planning documents, site visits, photographs, proposed Project drawings and typical sections of the preliminary design. Refer to **Appendix I** and **Appendix J**.

Much of the I-24 Southeast corridor currently maintains a moderate-to-high visual quality status due to vegetated open spaces, rolling terrain, occasional views of mountains and unique limestone outcrops. Based on a review of land use planning documents, the proposed Project area is also experiencing an increase in residential, commercial and industrial development that is beginning to affect the visual quality. These views would continue to transform as development increases in the proposed Project area.

3.2.1. Proposed Project Elements That May Affect Visual Quality

Proposed typical sections, at-grade and elevated, are provided in **Figure 2-5 – Figure 2-6** above, illustrating the physical components of the proposed Project that would impact the I-24 Southeast corridor. Some of these components include:

- At-grade interstate roadway reconfiguration and widening (barriers and striping)
- Bridged interstate roadway: columns, piers, abutments and elevated roadway
- Interchange improvements: direct connectors and flyovers
- Retaining walls and noise barriers
- Signage
- Drainage infrastructure
- Landscape material
- Lighting
- Intelligent Transportation System infrastructure (digital signage)

3.2.2. Resulting Visual Quality

Three key evaluation steps were used to assess potential impacts, as shown below, with potential impacts shown in **Table 3-7**.

1. Determine whether the proposed Project would be consistent with the visual resource protection policies and goals stated in comprehensive plans and ordinances.
2. Delineate the proposed Project elements likely to impact visual quality and what effect they could have.
3. Analyze the actual effect in the context of the visual quality being affected.

⁵¹ The VIA was prepared in accordance with [FHWA's Guidelines for the Visual Impact Assessment of Highway Projects](#) (U.S. Department of Transportation, 2015).

Table 3-7: Proposed Project Elements and Visual Impacts

ELEMENT	DESCRIPTION	VISUAL IMPACT
Mainline Widening	Widening along I-24 would accommodate additional elevated and at-grade Choice Lanes, resulting in some partial and full property acquisitions and removal of landscaping and swaths of native vegetation.	Removal of landscaping, addition of new/replacement retaining walls, modifications to existing noise barriers and existing patterns of exposed limestone outcrop would change.
Barriers/Walls	Noise barriers are anticipated along the corridor and retaining walls would be required leading up to bridge structures to avoid major cut and fill impacts.	Noise barriers would block views and separate adjacent areas, creating visual disruption. Retaining walls in some areas would introduce an urban feel and visual disruption to natural areas for some travelers.
Interchanges and Structures	Access control and grade separations over bridges and highway structures.	Elevated structures are consistent within existing corridor and in some areas, bridges may be within views from roads, residences and buildings.
Drop-ramps	Ramps leading up to major structures rising from the highway corridor to overpass bridges.	From some views, drop-ramps may block views of residences and businesses.
Lighting	Lighting would be placed along the proposed Project corridor, including shields directing light downward; luminaries would be compatible with local lighting ordinances and the visual character of adjacent development.	Lighting would be properly designed to limit glare effects, the level of ambient light in nearby areas and skyglow.
Rock Cut	Preliminary plans show rock cuts would be required in some areas along the corridor.	New rock cuts could create areas of visual interest where retaining walls are not required.

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Table 3-8 provides a quantification of the physical elements that would cause visual change along the I-24 Southeast corridor.

Table 3-8: Quantifications of Proposed Project Elements that Would Impact Visual Change

ELEMENT	I-40	I-440	I-24	COMBINED
Total proposed linear feet of noise barriers preliminarily determined to be feasible and reasonable	6,885 (13-20) ¹	299 (8-12)	55,271 (11-24)	62,455 (20)
Reconstructed linear feet of noise barriers if some existing noise barriers are left in place and partially reconstructed ²	2,361 (15)	7,088 (9-20)	0 (0)	9,449 (20)
Linear feet of retaining walls	27,264	10,738	81,158	119,160
Linear feet of elevated roadway ²	22,493	7,378	65,785	95,656
Number of bridge replacements	10	4	23	37
Number of structures impacted	8	2	25	35

Notes:

1. Approximate barrier height range (in feet).

2. Elevation of elevated roadways is highly variable, from approximately 25 feet to 60+ feet high.

Based on the above elements and anticipated impacts, the proposed Project would have both temporary and permanent visual effects to residences, businesses and travelers with the greatest visual changes being in areas of elevated structures. Temporary visual impacts could be experienced from construction activities and may include the removal of landscaping, the presence of large equipment, modifications and replacement of interchanges and construction lighting to widen the ROW. Permanent visual impacts may occur from changes to the environment in areas, such as parks, where viewers would be sensitive to visual and aesthetic conditions, and may also include the acquisitions of residential and/or commercial properties.

3.3. Would the proposed Project cause Relocations?

A Conceptual Stage Relocation Plan (CSRP) was prepared by TDOT to assess any potential relocations that would result from the construction of the proposed Project (**Appendix K**). The CSRP was updated to capture the anticipated effects on ROW acquisition for the design refinements of the Build Alternative, and approved by TDOT’s Right-of-Way Division on October 29, 2025.

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The Build Alternative would result in 51 anticipated relocations. Business relocations (18 total) would include five warehouses, one truck rental service, one auto repair service, one oil change service, one motorcycle dealership, one plaster and paint service, two catering businesses, two restaurants and bars, one gas station, one hotel, one supermarket, and one business under construction. Residential relocations (33 total) would include 29 single-family residences and two multi-family units (duplexes) that account for four separate displacements.

As stated in the CSRP, residential displacements resulting from the proposed Project should not create issues in finding suitable replacement housing for any potential residential relocations. The supply of available housing appears adequate to satisfy the relocation requirements of the 29 single-family residences and two multi-family units. Additionally, there is adequate lease availability for warehouses as well as commercial/retail spaces from the Nashville to La Vergne area, which encompasses all potential business relocations.

TDOT would make relocation assistance available to all eligible persons impacted by the proposed Project, including those requiring special services or assistance.^{52,53} The TDOT Regional Relocation Staff would administer the relocation program under the rules, policies and procedures set forth in the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,⁵⁴ as amended. The relocation program would be executed in a manner that is practical and would allow for the efficient relocation of all eligible displaced persons in accordance with state and federal guidelines.

TDOT would also provide advance notification of the proposed ROW acquisition. The TDOT Right-of-Way Division has the responsibility of appraising, purchasing and, if required, assisting individuals, families or businesses in relocating. Before acquiring property, all properties are appraised based on comparable sales and land use values in the surrounding areas.

The No-Build Alternative would not result in any relocations.

⁵² [TDOT Residential Relocation Assistance](#), Accessed November 2024.

⁵³ [TDOT Non-Residential Relocation Assistance](#), Accessed November 2024.

⁵⁴ [49 CFR 24](#), Accessed November 2024.

Table 3-9: Potential Relocation Impacts from the I-24 Southeast Choice Lanes Proposed Project

PROPERTY TYPE	NO-BUILD ALTERNATIVE RELOCATIONS	BUILD ALTERNATIVE RELOCATIONS
Businesses	0	18
Single Family Residential	0	29
Multi-Family Residential	0	4 (two duplexes with four occupied units)
Total	0	51

3.4. Would the proposed Project affect Air Quality?

To evaluate if the proposed Project would affect air quality, the Project Team followed TDOT's *Air Quality Procedures*⁵⁵ and FHWA's *Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents*.⁵⁶ The Project Team analyzed the transportation conformity requirements for the proposed Project, potential MSAT effects and construction air quality. For the detailed air quality analysis, refer to the Air Quality Technical Report (**Appendix L**).

3.4.1. Does the proposed Project meet transportation conformity?

Transportation conformity verifies that projects funded or approved by FHWA comply with state plans to achieve or maintain air quality standards for specific pollutants. The U.S. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) exposure limits for air pollutants, including particulate matter (PM₁₀ and PM_{2.5}), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂) and lead (Pb). Transportation conformity applies to all these pollutants in nonattainment and maintenance areas except for SO₂ and Pb.

Davidson and Rutherford counties, where the I-24 Southeast corridor is located, are in attainment with the NAAQS. That means the I-24 Southeast corridor is in an area where air quality meets or exceeds national standards. Since the proposed Project counties are in attainment for all transportation-related criteria pollutants and the proposed Project is not located in an air quality maintenance area, transportation conformity is not required.

⁵⁵ TDOT, ["Tennessee Environmental Procedures Manual,"](#) April 2025.

⁵⁶ FHWA, ["Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents,"](#) January 18, 2023.

3.4.2. What are the potential MSAT effects?

MSATs are a type of air pollutant that are released from vehicles like cars and trucks and are understood to have adverse health impacts. Per FHWA guidance,⁵⁷ the proposed Project qualifies as a “Project with Higher Potential MSAT Effects” because of the increase in highway capacity and forecasted vehicles per day. To determine these potential effects, the Project Team conducted detailed modeling. The model used a design year of 2045 because it is the longest-term horizon year available for the adopted regional travel demand model.

Based on the Motor Vehicle Emission Simulator (MOVES) modeling for the proposed Project (**Appendix L**), the Build Alternative would increase annual MSAT emissions up to 6.6 percent and vehicle miles traveled (VMT) by 9.2 percent in 2045 as compared to the No-Build Alternative. However, as shown in **Table 3-10**, MSAT emissions under both the No-Build Alternative and the Build Alternative are expected to substantially decrease (between 54.3 percent and 99.6 percent depending on pollutant) in 2045 as compared to 2025 existing scenario emissions. The projected decrease in future MSAT emissions is attributed to the EPA’s vehicle emissions and fuel control programs along with fleet turnover.⁵⁸

Construction activities would also generate intermittent and temporary construction-related MSAT emissions and dust. These temporary effects would be minimized using standard best management practices, such as limiting construction vehicle idling and using water to suppress dust.

⁵⁷ FHWA, [“Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents,”](#) January 18, 2023.

⁵⁸ US EPA, [Regulations for Onroad Vehicles and Engines](#), accessed October 2025.

Table 3-10: Annual MSAT Emissions and VMT

MSAT	SCENARIO			DIFFERENCE (%)		
	2025 Existing	2045 No-Build	2045 Build	2025 Existing to 2045 No-Build	2025 Existing to 2045 Build	2045 No-Build to 2045 Build
Benzene (Metric Ton/year (MT/yr))	4.5237	1.9140	2.0346	-57.7%	-55.0%	6.3%
1,3-Butadiene (MT/yr)	0.2981	0.0013	0.0013	-99.6%	-99.6%	1.1%
Formaldehyde (MT/yr)	3.4168	0.9769	1.0266	-71.4%	-70.0%	5.1%
Acrolein (MT/yr)	0.2091	0.0434	0.0454	-79.2%	-78.3%	4.6%
Naphthalene (MT/yr)	0.3841	0.0880	0.0928	-77.1%	-75.8%	5.4%
Acetaldehyde (MT/yr)	2.0773	0.6113	0.6376	-70.6%	-69.3%	4.3%
Ethyl Benzene (MT/yr)	2.8301	1.2466	1.2933	-56.0%	-54.3%	3.7%
POM (MT/yr)	0.1652	0.0361	0.0384	-78.2%	-76.7%	6.6%
Diesel PM (MT/yr)	11.0463	0.7847	0.8132	-92.9%	-92.6%	3.6%
VMT Million Vehicle Miles/yr	2,606	3,094	3,380	18.8%	29.7%	9.2%

3.5. Would the proposed Project affect roadway Noise Levels?

A Noise Technical Report was completed for the proposed Project in accordance with 23 CFR 772,⁵⁹ Procedures for Abatement of Highway Traffic Noise and Construction Noise and the TDOT *Guidance on Highway Traffic Noise Abatement*^{60*} (Effective October 28, 2025). Noise-sensitive receptors are considered impacted when they approach the FHWA Noise Abatement Criteria (NAC) as shown in the Noise Technical Report (**Appendix M**). TDOT considers approach to be one decibel lower than the FHWA NAC for the respective activity category.

Based on the traffic noise analysis, the number of noise-sensitive receptors predicted to become impacted by future traffic noise is shown in **Table 3-11** below. The table includes

⁵⁹ 23 CFR 772, Accessed January 2025.

⁶⁰ TDOT Noise Abatement Policy, Accessed January 2025.

*Links to 2011 TDOT noise policy. Link will be updated when 2025 guidance is published on TDOT’s web page.

those receptors expected to experience traffic noise impacts by either approaching or exceeding the FHWA NAC or by a substantial increase in exterior noise levels as defined in the TDOT traffic noise policy. Design year noise levels for the Build Alternative are predicted to be 0 to 18 decibels greater than existing noise levels. Receivers impacted due to design year noise levels approaching or exceeding the NAC values are identified in Appendix E located in Appendix M of the Noise Technical Report.

Table 3-11: Predicted Traffic Noise Impacts

LABEL	TRAFFIC NOISE IMPACTS			
	Residential (NAC B)	Places of Worship, Schools, Parks, etc. (NAC C & D)	Businesses (NAC E)	Total
Build Alternative	3,218	43.25	18.29	3,279.54
No-Build Alternative	0	0	0	0

Measures for reducing traffic noise impacts, in the form of noise barriers, were considered for all impacted receptors in the Build Alternative. For each of these measures, benefits versus allowable abatement quantity (reasonableness), engineering feasibility, effectiveness and other factors were all included in the noise abatement considerations. A noise barrier evaluation was conducted for this proposed Project utilizing the Traffic Noise Model 2.5 software developed by the FHWA.

In summary, the Traffic Noise Analysis identified 30 potential noise barriers that preliminarily meet the feasibility and reasonableness criteria found in the TDOT traffic noise policy (further information included in **Appendix M**). One additional barrier (barrier #29) was preliminarily found to be feasible and reasonable; however, because this barrier would not meet the noise reduction design goal it was removed from the list of qualifying barriers. A more detailed analysis will be completed during the proposed Project's final design. Noise barriers preliminarily found to be feasible and reasonable during the preliminary noise analysis may not be found to be feasible and reasonable during the final design noise analysis due to changes in the proposed Project's vertical or horizontal geometry and other design considerations such as drainage and safety considerations, surrounding land use development, utility conflicts and other factors that may preclude the ability to construct a noise barrier or construct the barrier without losing its effectiveness to reduce traffic noise impacts. Conversely, noise barriers that preliminarily were not considered feasible and reasonable may meet the established criteria and be recommended for construction based on final design. TDOT will make final determinations

regarding the construction of noise barriers, including proposed replacement barriers, after completion of the proposed Project's final design, utility evaluations and solicitation of the viewpoints of benefited property owners and residents.

Highway construction involves increased noise levels. The anticipated increases in noise associated with the Build Alternative would be temporary and minor in nature. This construction-related noise increase would not constitute a noise impact as defined by the FHWA noise regulation and TDOT's noise policy. Temporary construction noise reduction measures, such as nighttime and weekend work restrictions, may be considered.

Under the No-Build Alternative, noise levels were reasonably estimated by evaluating existing and future traffic volumes and applied interstate growth rates. As a result, existing noise levels were increased by 1 dBA.

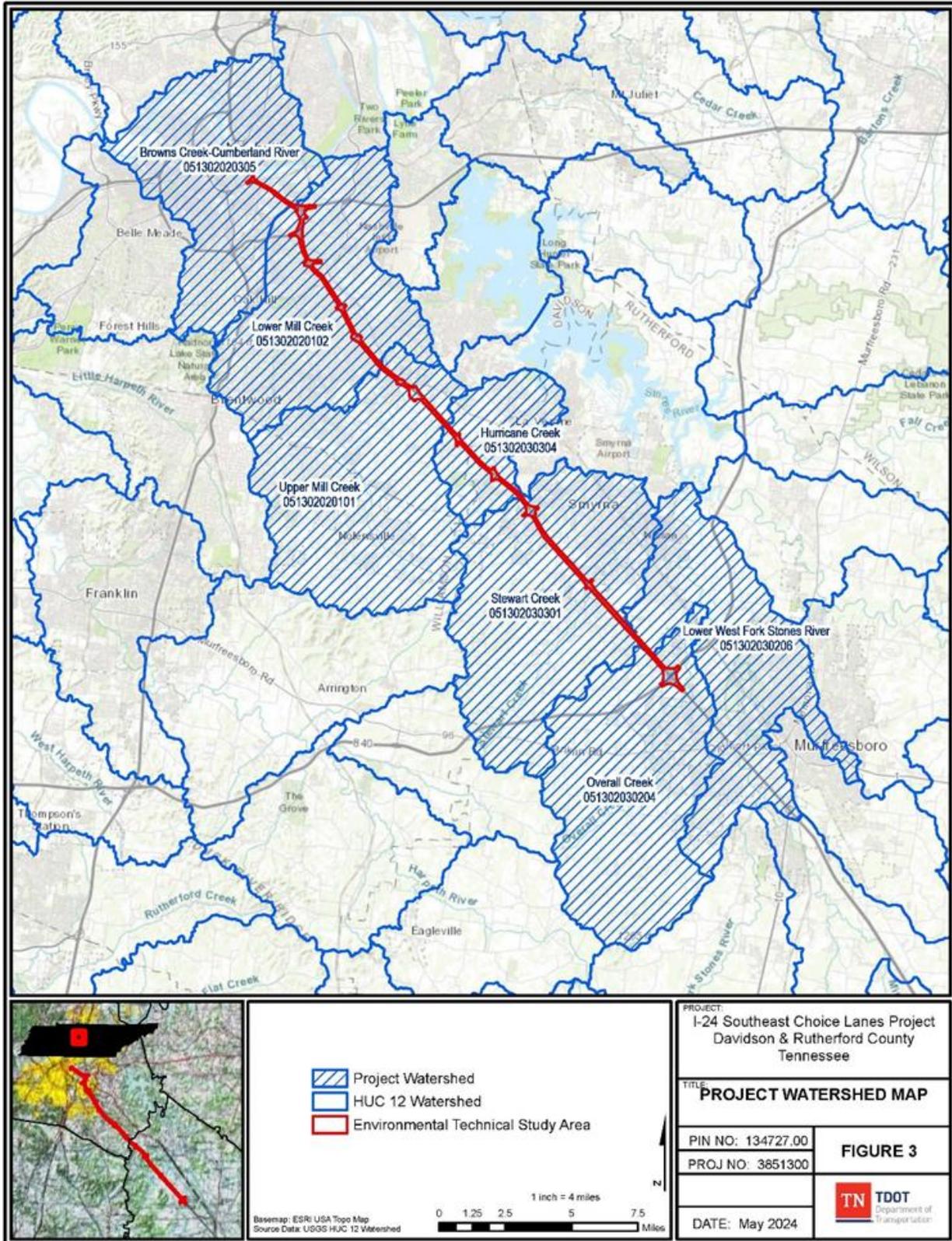
3.6. Would the proposed Project affect Water Resources?

3.6.1. What water resources are located within the ETSA?

An Environmental Boundaries Report (EBR) was prepared for the proposed Project. The EBR includes an ecological evaluation within the ETSA. Evaluations were performed to identify the potential presence of wetlands and other water resources that could be impacted by the proposed Project. An initial desktop review of potential resources within the ETSA was performed, followed by field surveys conducted between January 8, 2024, and February 7, 2024. Due to ETSA expansions, additional field surveys were performed in September 2024 and August 2025 to account for any further potential impacts to water resources. Full details on surface water resources, their locations and status can be found in the EBR included in **Appendix N**.

The ETSA for the proposed Project spans seven Hydrologic Unit Code-12 (HUC-12) watersheds, which are within the Tennessee River Basin (**Figure 3-2**). Various water feature types were identified during surveys and are summarized in **Table 3-12**.

Figure 3-2: Map of the ETSA and associated HUC-12 Watersheds



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Table 3-12: Water Features Within the I-24 Southeast Choice Lanes Project ETSA

FEATURE TYPE	TOTAL NUMBER IN ETSA
Stream	96
Stormwater Pond	32
Man-made Pond	6
Wet Weather Conveyance/Ephemeral Stream	25
Wet Weather Conveyance/Upland Drainage Feature	45
Vertical Rock Seep	9
Wetland	78

3.6.2. How would Water Quality be impacted?

Pursuant to the 1977 Tennessee Code of Laws, the Tennessee Department of Environment and Conservation (TDEC) shall declare regulations to implement the Water Quality Control Act (TN Code 69-3-101). Rule 0400-40-04,⁶¹ Use Classification for Surface Waters, provides a listing of water bodies in the state along with their locations and classifications. Rule 0400-40-03,⁶² General Water Quality Criteria, establishes water quality uses, general rules and water quality criteria specific to each classification. Water quality standards established in Rule 0400-40-03 are also used to inform decisions for other water quality programs such as the NPDES. The standards established within the Water Quality Control Act have been approved by the EPA in accordance with Section 303(c) of the Clean Water Act (CWA) and 40 CFR 131.

TDEC maintains a List of Impaired Waters that do not currently meet state water quality standards pursuant to Section 303(d) of the CWA and 40 CFR 131 and updates this list biannually. Sources of data that inform the 303(d) list come from the TDEC monitoring program, complaint investigations and permitted facility compliance inspections and submitted self-inspection monitoring data. A total of 13 surface water features located within the ETSA were on the 2024 303(d) List of Impaired Waters. Those waters on the 303(d) List are identified in the EBR (**Appendix N**). The complete 2024 303(d) List, as well as

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⁶¹ [Use Classifications of Surface Waters](#), Accessed October 2025.

⁶² [Water Quality Criteria](#), Accessed October 2025.

the water quality parameters and rationales for listing can be found through the TDEC website.⁶³

The Build Alternative has the potential to affect water quality through the quantity and quality of stormwater runoff (**Table 3-13**). Increases in impervious surfaces result in less water being stored as groundwater during and after precipitation events and instead, transfer water to local streams and drainage features via stormwater sewers. Increased quantity and velocity of runoff associated with increases to impervious surfaces can lead to localized flooding events. The quality of water during these events is typically degraded due to increased amounts of sediment present in the water.⁶⁴ However, TDMLs would not be impacted since the project would adhere to all TDOT specs and NPDES requirements.

Existing and newly constructed stormwater BMPs would be used to treat stormwater runoff to the maximum extent practicable before it leaves TDOT ROW. BMPs would include a combination of biologically active filtration, hydrodynamic separation and flow through Manufactured Treatment Devices (MTDs). Potential impacts from the proposed Project on water quality would be evaluated and permitted through Sections 401 and 402 of the CWA and TDEC certifications. The proposed Project's design would incorporate BMPs to avoid and/or minimize impacts to water quality during and after construction in accordance with 23 CFR Part 650 Subpart B⁶⁵ and the *Tennessee Permanent Stormwater Management and Design Guidance Manual*.⁶⁶ Additionally, the Build Alternative is not anticipated to further impair those streams or stream sections currently on the 303(d) List.

3.6.3. How would Wetlands and other Waters of the U.S. be impacted?

Wetlands and WOTUS are subject to federal jurisdiction by the authority of the U.S. Army

What is a Wetland? The USACE and EPA define wetlands as *"areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."*

Corps of Engineers (USACE) and are protected under Section 404 of the CWA (33 CFR 328).⁶⁷

The Build Alternative would result in unavoidable impacts to wetlands and WOTUS (**Table 3-13**). In addition to providing specialized habitat to plant and animal species, wetlands and WOTUS have sponge-like characteristics that absorb and/or naturally channel rainwater to larger receiving waterways. The loss of wetlands and WOTUS can lead to degraded water quality and localized

⁶³ [TDEC 2024 303 \(d\) listed waters](#), Accessed October 2025.

⁶⁴ [Impervious Surfaces and Flooding](#), USGS, Accessed September 2024.

⁶⁵ [Erosion and Sediment Control on Highway Construction Projects](#), Accessed October 2025.

⁶⁶ [TDEC Permanent Stormwater Management and Design Guidance Manual](#), Accessed September 2024.

⁶⁷ <https://www.ecfr.gov/current/title-33/chapter-II/part-328>, Accessed September 2024.

flooding during rain events since their extensive root systems serve to provide filtration of waters and trap sediments.⁶⁸

No reasonable alternatives exist that meet both the purpose and need of the proposed Project and avoid impacts to wetlands and WOTUS. The proposed Project’s final design would minimize, to the maximum extent practicable, temporary and/or permanent impacts to wetlands and WOTUS. BMPs would be used to avoid and/or minimize sediment transfer into adjacent wetlands and WOTUS for the duration of Project construction. Permitting for unavoidable impacts would occur through Section 404 of the CWA and through TDEC’s Section 401 Water Quality Certification/Aquatic Resources Alteration Permit (ARAP)⁶⁹ program. Compensatory mitigation for streams and wetlands will follow applicable state and federal requirements.

The No-Build Alternative would not result in impacts to water resources as no construction activity would occur in or near existing waters.

Table 3-13: Impacts to Water Resources from the I-24 Southeast Choice Lanes Project

RESOURCE	NO-BUILD ALTERNATIVE IMPACTS	BUILD ALTERNATIVE IMPACTS
Impacts to 303(d) Listed Streams	No impact	No further water quality impairment
Stormwater Runoff	No impact	Potential increases in runoff quantity and velocity due to a 289.1 acre (41.5%) increase in impervious surfaces from the existing coverage of I-24 and associated impervious surfaces within the ETSA
Water Quality	No impact	Potential decline in water quality due to sedimentation related to stormwater runoff and loss of wetland habitat
Jurisdictional Streams	No impact	12,282 linear feet
Jurisdictional Wetlands	No impact	4.05 acres of permanent fill

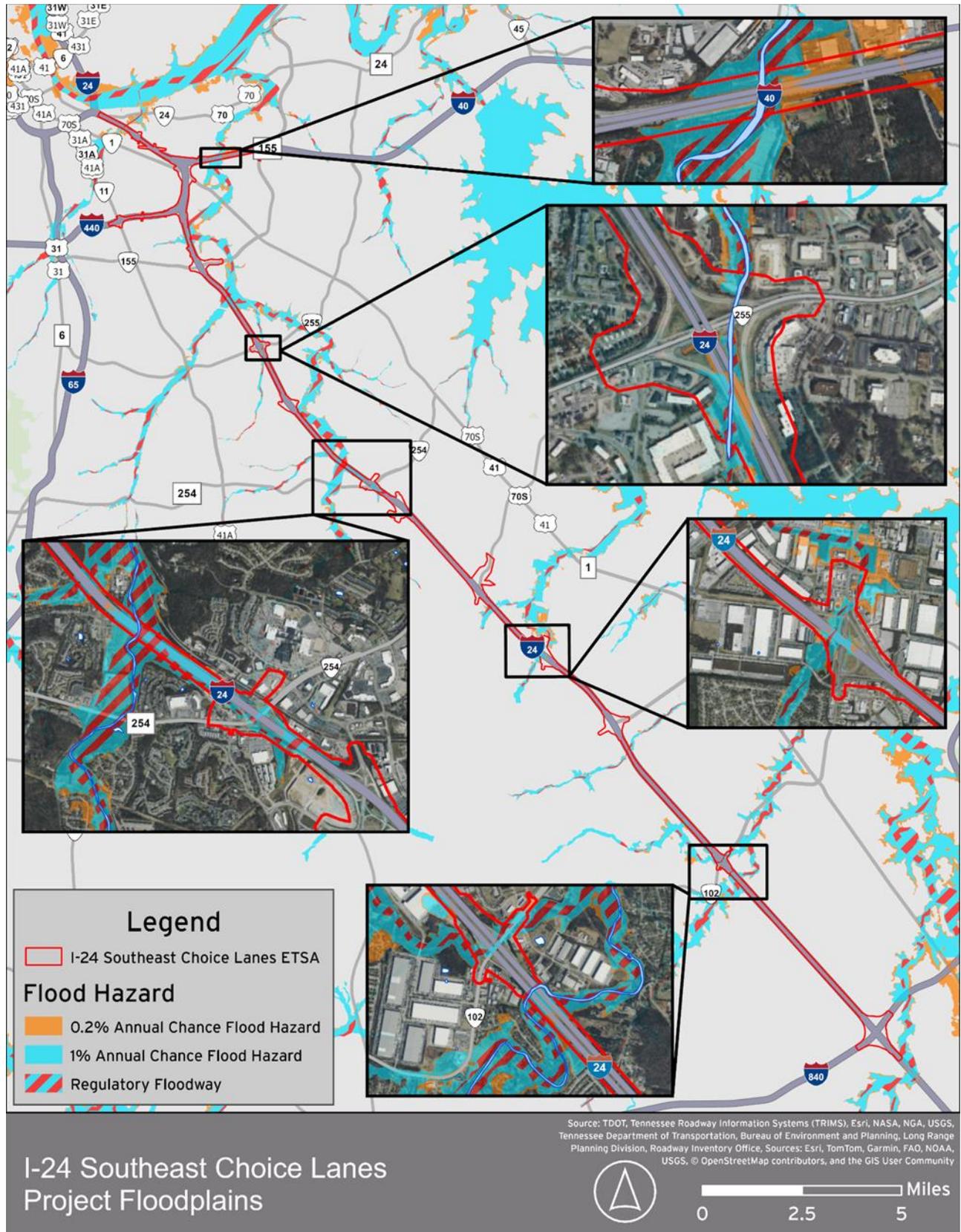
⁶⁸ [Effects of Wetlands on the Environment](#), USEPA, Accessed September 2024.

⁶⁹ [TDEC Aquatic Resources Alteration Permit](#), Accessed September 2024.

3.7. Would the proposed Project affect Floodplains?

A total of 18 Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), years 2007 through 2024, were collected and reviewed for the ETSA in Davidson and Rutherford counties. Two additional FIRMS within the ETSA are not printed by FEMA, and therefore were not collected (FIRM panels 47037C0476H, 47149C0119H). In total, there are approximately 207 acres of floodplains within the ETSA – or approximately 8.8 percent of the total ETSA area (**Figure 3-3**). Development of a project within the study area would result in a No Rise Certification or a Conditional Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR), consistent with the Memorandum of Understanding (MOU) between FHWA and FEMA, and also may require adherence to state and local ordinances. Any work completed in Zone AE would require local community coordination with the local Flood Plain Administrator. Additional details on flood zone types found within the ETSA, including portions of the FEMA FIRMs, can be found in the Floodplain Management Technical Report (**Appendix O**).

Figure 3-3: I-24 Southeast Choice Lanes Project Floodplains and Stream Crossings



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There are 11 individual named streams and 10 unnamed tributaries that cross portions of the 100-year or 500-year floodplain within the ETSA. Seven named streams present a potential flood hazard to the proposed project (**Table 3-14**); however, hydrologic studies and hydraulic reporting analyses have not yet been completed at this stage of project development. The Build Alternative would be designed in an effort to meet “No-Rise” certification requirements such that any encroachment on special flood hazard areas with established Zone AE floodplains and Regulatory Floodways would result in no change from the established 100-year flood elevations. Hydraulic analyses will be completed during final design to determine impacts, and future design and/or construction would 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.

The No-Build Alternative would not affect floodplains.

Table 3-14: Named Streams with Potential Flood Hazard to the I-24 Southeast Choice Lanes Project

STREAM	DESCRIPTION
Browns Creek	Crosses I-24 Southeast Project in the far northwest segment of the ETSA on I-40
Mill Creek	Crosses the I-24 Southeast Project near the I-24/I-40 interchange, intersects and parallels sections of the northern portion of the I-24 Southeast Project in Davidson County
Sorghum Branch	Crosses the I-24 Southeast Project at state Route (SR) 255 (Harding Place) in Davidson County
Collins Creek	Located in the central portion of the study area near La Vergne (Davidson and Rutherford Counties)
Hurricane Creek	Located in the central portion of the study area near La Vergne (Davidson and Rutherford Counties)
Olive Branch	Intersects the I-24 Southeast Project in Smyrna (Rutherford County)
Stewart Creek	Intersects the I-24 Southeast Project south of SR 102 (Lee Victory Parkway) in Rutherford County

3.8. Would the proposed Project affect any Protected Species or Natural Habitat?

3.8.1. What Natural Habitats and Protected Species occur in the area?

The proposed Project's ETSA is comprised of residential, commercial and industrial development, agricultural land, public recreational areas, existing roadways and natural habitats. Natural habitats in the ETSA include upland forests, wetlands and streams. Wetland types in the ETSA include Palustrine Emergent, Palustrine Forested and Palustrine Scrub-Shrub. Additionally, seven Specialized Habitats (SPH) were identified during desktop and field surveys of the ETSA during the development of the EBR (**Appendix N**). Of the seven SPH identified, four were identified as naturally occurring glades/prairies, two were areas modeled as potential habitat for rare plants and one was identified as a migratory bird stopover location. Observed glade/prairie vegetation included glade stonecrop (*Sedum pulchellum*), red cedar (*Juniperus virginiana*), limestone calamint (*Clinopodium arkansanum*), wiry witch grass (*Panicum flexile*), Gattinger's prairie clover (*Dalea gattingeri*) and Gattinger's lobelia (*Lobelia gattingeri*). Observed migratory bird species included red-winged blackbird (*Agelaius phoeniceus*), common grackle (*Quiscalus quiscula*), brown-headed cowbird (*Molothrus ater*) and various hawk species. Locations of the SPH can be found in the EBR (**Appendix N**). The ETSA also intersects two HUC-12 watersheds (the Upper and Lower Mill Creek watersheds) known to be inhabited by the federally endangered Nashville crayfish (*Orconectes shoupi*).⁷⁰

The Endangered Species Act (ESA) of 1973 was established, in part, to provide protections for fish, wildlife and plants listed as threatened or endangered by the United States Fish

A Section 7 Consultation is a process that federal agencies must use to verify they are not harming listed species or their habitat. Consultation with the USFWS will lead to an effects determination for an agency's proposed actions as having "no effect," "may affect, but unlikely to adversely affect" or "may affect, likely to adversely affect."

and Wildlife Service (USFWS), to conserve the habitats upon which those species rely, provide interagency cooperation to avoid take of listed species and for issuing permits for otherwise prohibited activities.⁷¹ Species listed on the ESA are subject to Section 7 Consultation with the USFWS to see that proposed federal activities do not adversely affect their existence directly through take or indirectly through critical habitat loss/modification. The Tennessee Wildlife

⁷⁰ The Nashville crayfish was reclassified to the genus *Faxonius* in 2017. *Orconectes* is used throughout this document for consistency with the taxonomic classification at the time of listing on the Endangered Species Act.

⁷¹ [16 USC 1531-1544](#), Accessed September 2024.

Resources Agency (TWRA)⁷² and TDEC⁷³ maintain corresponding lists for species of concern specific to the state of Tennessee. Forty species with a federal or state listing status are known, or have the potential, to occur within the ETSA. Those species and their listing statuses are included in **Appendix N**.

3.8.2. How would the proposed Project affect Natural Habitats or Protected Species?

The Build Alternative has the potential to affect protected species directly through take and/or indirectly through habitat loss and/or modification (**Table 3-15**). For further information on the potential for direct impacts to protected species, refer to the Biological Assessment (**Appendix P**). Loss and/or modification to natural habitats from the proposed Project are expected to be minimal. The Build Alternative would require 34.9 acres of ROW to be acquired and converted for transportation use. As noted in **Appendix G**, current land use within the ETSA is dominated (>90%) by varying degrees of development. Further, all land parcels that would be impacted by proposed ROW acquisitions are currently zoned for development, thus the proposed Project would not create unanticipated changes to the area. Additionally, no designated critical habitats occur within the ETSA for the protected species listed under the ESA.

The tricolored bat (*Perimyotis subflavus*) was proposed for listing as endangered by the USFWS on September 13, 2022. No determination of effects is needed until a listing designation goes into effect and TDOT will initiate consultation with USFWS in the event of listing. Tree clearing would be restricted to the period between October 1 and March 31 to avoid impacts to potential roost sites, per USFWS guidance.⁷⁴ Therefore, the proposed Project is Not Likely to Adversely Affect Tricolored bats. USFWS concurred with this determination on January 27, 2025. Additionally, a survey was completed on January 21, 2026 and confirmed suitable habitat for bats in a cave feature (CAV-1) located along I-24. A bat emergence survey will be completed to confirm the presence or absence and additional coordination with USFWS may be required. However, based on the current design, there are no anticipated impacts to the cave feature.

The streamside salamander (*Ambystoma barbourin*) is listed as an at-risk species on the ESA and is a Tennessee state-endangered species. To determine if the proposed Project would have potential impacts on this species, presence/absence surveys were conducted from January 7 to January 15, 2025 and from March 4 to March 6, 2025 within suitable breeding habitats previously delineated within the ETSA. These dates fall within this species' breeding range (December 15 to March 15), providing the highest likelihood of detection, if

⁷² [Chapter 1660-01-32](#), Accessed September 2024.

⁷³ [TN Natural Heritage Program – Rare Species List](#), Accessed November 2024.

⁷⁴ [Guidance on Developing and Implementing a Bat Conservation Plan](#), Accessed November 2024.

present. A total of 68 features were surveyed, of which there were no observations of streamside salamander adults, larvae, or egg masses. Based on these surveys, the proposed Project May Affect, but is Not Likely to Adversely Affect the streamside salamander. The Antecedent Precipitation Tool indicated that at the time of surveys some features may have been under drought conditions, potentially inhibiting breeding activity. Further, streamside salamanders have been known to utilize storm water basins for breeding, which were features not included in the previous surveys. As such, additional surveys are scheduled for the 2025/26 breeding season to revisit features previously under drought conditions, as well as storm water basins. Full details of the surveys conducted for this species are included in **Appendix N**.

The Nashville crayfish (*Orconectes shoupi*) is listed as endangered under the ESA. Unavoidable in-stream work would likely result in impacts to this species. Potential direct effects would include harassment and/or take of individuals and alteration and/or loss of habitat. Cumulative effects would be alteration and/or loss of habitat due to reasonably foreseeable future development. Therefore, it is expected that the proposed Project May Affect and is Likely to Adversely Affect the Nashville crayfish. Due to the expectation of an adverse effect on this species, consultation with USFWS was initiated in August 2024. A Biological Assessment (BA) was submitted in February 2025 detailing the potential impacts that proposed construction activities may have on the Nashville crayfish, and outlined potential measures to minimize and/or mitigate harm to the species and its habitat. Upon review of the BA, formal consultation was initiated between FHWA and USFWS on April 25, 2025. Since formal consultation was initiated, expansions to the original ETSA have occurred while the potential range of impacts have been reduced through habitat surveys. As such, the BA was updated to reflect these changes and resubmitted to USFWS on 12/22/25. The full BA can be found in **Appendix P**. A Biological Opinion (BO) will be issued prior to the FONSI once FHWA and USFWS have agreed with TDOT's determination and proposed efforts to mitigate impacts to the species. The BO will also define terms and conditions for the Developer's construction activities and any associated in-water work restrictions. The BO will document their concurrence and formally complete the consultation effort for this species.

Guthrie's (Pyne's) ground-plum (*Astragalus bibullatus*) and leafy prairie-clover (*Dalea foliosa*) are listed as endangered under the ESA. Four glades were identified during development of the EBR as having potential habitat for these species. Locations of glades can be found in **Appendix N**. The first glade falls outside the ETSA and no ROW acquisition or construction impacts are expected. ROW acquisition and subsequent development are expected in the area of the second glade; however, no individuals of these species were identified during the development of the EBR. Additionally, TDOT surveyed this location on six occasions from March 30, 2023, to August 8, 2023, to identify the presence of rare species of conservation concern, including Guthrie's ground-plum and leafy prairie-clover. No

individuals of either species were identified during those surveys. Status of these species in the remaining two glades is undetermined, but presence surveys are planned for in 2026. If found, additional coordination may be required with USFWS and individuals would be relocated to suitable habitat prior to construction activities occurring, as indicated in **Table 5-1**. Therefore, the proposed Project is Not Likely to Adversely Affect Guthrie’s ground-plum or leafy prairie-clover.

Braun’s rock-cress (*Arabis perstellata*) is listed as endangered under the ESA. Two areas of suitable habitat for this species were identified within the ETSA; neither is expected to be impacted by construction activities of the Build Alternative. Therefore, the proposed Project is Not Likely to Adversely Affect Braun’s rock-cress. USFWS concurred with this determination on January 27, 2025.

Migratory birds listed in 50 CFR 10.13⁷⁵ are provided protections under the Migratory Bird Treaty Act (MBTA) of 1918. Under the MBTA, it is illegal to “take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to Federal regulations.”

One migratory bird stopover location was identified within the ETSA. ROW acquisition is expected in this area with the potential for tree clearing in a portion of the identified habitat. The Build Alternative is not expected to impact migratory birds as TDOT would comply with the MBTA regarding the take of migratory birds and/or destruction of their nests. Additionally, TDOT would comply with the procedures outlined in the Special Provision Regarding Nesting Sites of Cliff Swallows and Barn Swallows.⁷⁶

The No-Build Alternative would not affect natural habitats or protected species.

Table 3-15: Impacts to Natural Habitats and Protected Species from the I-24 Southeast Choice Lanes Project

NATURAL HABITATS AND PROTECTED SPECIES IMPACTS		
Resource Impacted	No-Build Alternative	Build Alternative
Natural habitats	No impact	No adverse effect due to minimal conversion to transportation use and zoning designations in accordance with development
Tricolored bat	No impact	May Affect, Not Likely to Adversely Affect

⁷⁵ [Migratory Bird Treaty Act List](#), Accessed September 2024.

⁷⁶ [TDOT Special Provision](#), Accessed January 2025.

NATURAL HABITATS AND PROTECTED SPECIES IMPACTS		
Streamside salamander	No impact	May Affect, Not Likely to Adversely Affect
Nashville crayfish	No impact	May Affect, Likely to Adversely Affect
Guthrie’s (Pyne’s) ground-plum	No impact	No Effect
Leafy prairie-clover	No impact	No Effect
Braun’s rock-cress	No impact	No Effect
Migratory birds	No impact	No Effect

3.9. Would the proposed Project affect Hazardous Materials Sites or Underground Storage Tanks?

A Phase I Environmental Site Assessment (Phase I ESA) was completed and approved in May 2024. Additional site assessments were completed in August and September 2025 following expansions to the ETSA. The purpose of the Phase I ESA is to identify any environmental concerns related to hazardous materials sites that could potentially affect construction. The Phase I ESA and addenda are included in **Appendix Q**. Based on the available information in records research, understanding of the past and current operations and site reconnaissance, there are seven high-risk and 17 low-risk properties identified that are anticipated to be impacted by the proposed Project. Potential impacts identified in Phase 1 ESA report site properties vary. Potential parcel acquisitions may be full or partial, and not all will include direct impacts from construction activities. Level of impact will be determined by final design. Property locations and detailed descriptions of all identified sites are included in **Appendix Q**.

The No-Build Alternative would not impact any hazardous materials sites.

3.10. Would the proposed Project affect Cultural Resources?

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic

Historic properties are defined in the National Historic Preservation Act as properties that are listed in, or eligible for listing in, the National Register of Historic Places.

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properties,⁷⁷ which includes both historic and archaeological resources. To be eligible for listing, a site needs to be found significant in at least one of four criteria: A (Event), B (Person), C (Design/Construction) and D (Information Potential).

In addition to federal laws, Tennessee state law⁷⁸ protects cemeteries and family burial grounds regardless of whether they are listed, or eligible for listing, in the NRHP.

3.10.1. Have Tribal Nations and other consulting parties been consulted on the proposed Project?

In accordance with the requirements of Section 106 of the NHPA,⁷⁹ TDOT, on behalf of FHWA, has initiated consultation with Tribal Nations, the Tennessee State Historic Preservation Office (TN-SHPO), local officials and other parties with a demonstrated interest in historic properties or the proposed Project. On August 21, 2024, 11 Tribal Nations with a historical or treaty interest in Tennessee were invited to participate and three have responded to date. The Muscogee (Creek) Nation and Shawnee Tribe accepted the invitation to participate in Section 106 consultation; Eastern Shawnee Tribe of Oklahoma responded with a finding of “no adverse effect” rather than accepting the invitation to become a consulting party. On October 18, 2024, eight local officials and other parties were invited to participate in Section 106 consultation. Of these, Metro Nashville, the Metro Historical Commission and Historic Nashville, Inc. accepted the invitation.

3.10.2. What historic resources are in the ETSA and would they be affected?

One NRHP-listed resource, Mount Olivet Cemetery, and 16 resources recommended as eligible for listing in the NRHP are located in the ETSA (see **Table 3-16**). The TN-SHPO concurred with the eligibility of these resources on November 13, 2024.

The No-Build Alternative would have no effect to historic resources.

The Project Team evaluated potential impacts from the Build Alternative to the character-defining features of the 17 historic resources and the TN-SHPO recommended, in a letter dated March 7, 2025, an adverse effect finding to the Mill Creek Baptist Church Cemetery/Whitsett Cemetery and to the Rogers Manufacturing Plant. The Build Alternative would not directly impact any of the 17 historic resources through ROW acquisition, temporary easements or physical structure alterations; however, due to the proximity of the proposed elevated Choice Lanes to the Mill Creek Baptist Church Cemetery/Whitsett Cemetery and to one of the contributing buildings within the Rogers Manufacturing Plant, the visual intrusion incurred would have an adverse visual effect on these two resources. However, since there is only a visual adverse effect, no *de minimis*, *Programmatic*, or

⁷⁷ 54 USC 306108.

⁷⁸ Tennessee Code Annotated Title 46.

⁷⁹ 36 CFR Part 800.2.

Individual 4f evaluation was required. No physical alterations to Mill Creek Baptist Church Cemetery/Whitsett Cemetery or Rogers Manufacturing Plant would occur. While the proposed elevated Choice Lanes would be visible to other historic resources including Glenclyff United Methodist Church, the Kenworth Building and Ebenezer African Methodist Episcopal (AME) Church, the visual effects are more subtle and would not alter character-defining features that support their NRHP eligibility. See **Appendix R, Appendix S** and **Appendix T** for further details.

Table 3-16 summarizes the eligibility determinations and effect findings. For those resources with an adverse effects finding, a Memorandum of Agreement (MOA) is being drafted for mitigating these effects and will be included in the FONSI. **Section 3.10.3** addresses the cemeteries from an archaeological context and describes recommendations for avoidance, monitoring and further investigations where applicable.

Table 3-16: Summary of Listed and Eligible Historic Resources

NRHP LISTED OR ELIGIBLE PROPERTY	NRHP CRITERION & AREAS OF SIGNIFICANCE	NO-BUILD ALTERNATIVE EFFECTS	BUILD ALTERNATIVE EFFECTS
Mount Olivet Cemetery	A and C: Social History, Funerary Art and Architecture, Landscape Architecture	No effect	No effect
Historic Mount Ararat/Greenwood West Cemetery	A: Social History, Ethnic Heritage—Black	No effect	No effect
Greenwood Cemetery	A, B and C: Social History, Ethnic Heritage—Black, Art, Landscape Architecture	No effect	No effect
Calvary Cemetery	A and C: Social History, Art	No effect	No effect
Titan Logistics	C: Architecture	No effect	No effect
American Bread Company	A and C: Industry, Architecture	No effect	No effect
Printer Industry Association of the South	C: Architecture	No effect	No effect

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NRHP LISTED OR ELIGIBLE PROPERTY	NRHP CRITERION & AREAS OF SIGNIFICANCE	NO-BUILD ALTERNATIVE EFFECTS	BUILD ALTERNATIVE EFFECTS
Glenclyff United Methodist Church	C: Architecture	No effect	No effect
Hill-Roulhac Cemetery	B: Early Exploration and Settlement	No effect	No effect
Lions Club of Tennessee Headquarters	C: Architecture	No effect	No effect
Rogers Manufacturing Plant	A: Manufacturing	No effect	Adverse effect (Draft MOA)
Kenworth Building	C: Architecture	No effect	No effect
Ebenezer AME Church	A: Ethnic Heritage, Social History	No effect	No effect
Shoney's Headquarters	A: Commerce	No effect	No effect
Mill Creek Baptist Church Cemetery/Whitsett Cemetery	A: Settlement	No effect	Adverse effect (Draft MOA)
Holloway-Moore Farm Historic District	A, C, and D: Agriculture, Architecture, Archaeology	No effect	No effect
Saint Luke Primitive Baptist Church	A: Ethnic Heritage, Social History	No effect	No effect

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3.10.3. What archaeological resources are in the ETSA and would they be affected?

In addition to the cemeteries noted in **Section 3.10.2**, the following archaeological resources were identified within the ETSA. See **Appendix S** for more information.

- Six previously identified archaeological sites: a segment of the Trail of Tears, two historic cemeteries, the site of a water-powered mill, a school site, and the site of a rural historic domestic structure (non-extant)

- Five newly identified archaeological sites: two lithic scatters (i.e., surface evidence of human use), two historic farmsteads, and an historic urban street block that once contained domestic structures
- Seven cultural deposits defined as non-site localities
- Thirteen isolated finds
- Twelve Tennessee Historical Commission-registered cemeteries

Eight archaeological sites, non-site localities and isolated finds listed above were recommended not eligible for the NRHP. Two archaeological sites within the Holloway-Moore Farm Historic District were recommended potentially eligible for the NRHP but the portions of these sites within the ETSA do not contribute to their overall eligibility. TN-SHPO concurred with the eligibility of these resources on November 13, 2024 and November 4, 2025 (see **Appendix S**).

None of the cemeteries, including those described in **Section 3.10.2** have been evaluated for listing under NRHP Criterion D which would require the sites to yield, or have the potential to yield, important information about prehistory or history. Based on preliminary design, the Build Alternative would have no proposed activities within any of the cemetery boundaries. The No-Build Alternative would have no impacts to cemeteries.

Additional avoidance, monitoring and investigations are recommended for several cemeteries given their proximity to the proposed Project. These cemeteries, along with the recommendations, are summarized in **Table 3-17**.

Table 3-17: Cemetery Recommendations for Avoidance, Monitoring and Additional Research and Archaeological Survey

CEMETERY NAME AND/OR SITE ID	AVOIDANCE BUFFER	MONITORING / FURTHER INVESTIGATIONS
Baker-Goodrich Cemetery	Avoid parcel/easement boundary and 10-foot buffer around visible grave shafts noted during Phase I investigations.	Archaeological monitoring during, and/or non-destructive remote sensing prior to, ground-disturbing activities within an additional 25-foot buffer around the 10-foot avoidance buffer .
Historic Mount Ararat/Greenwood West Cemetery, Carper Cemetery, Foster-Owens Cemetery, Roach Cemetery, Morton-Holloway Cemetery, Gamble	Avoid parcel/easement or a 10-foot buffer from parcel wall/fence, whichever is greater.	None.

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CEMETERY NAME AND/OR SITE ID	AVOIDANCE BUFFER	MONITORING / FURTHER INVESTIGATIONS
Cemetery, Hill-Roulhac Cemetery (LT-10) and Hartman Cemetery		
Mill Creek Baptist Church Cemetery/Whitsett Cemetery	Avoid parcel/easement or a 10-foot buffer from parcel wall/fence, whichever is greater.	Archaeological monitoring during, and/or non-destructive remote sensing prior to, ground-disturbing activities within a 50-foot buffer from privately-owned parcels immediately adjacent to the eastern boundary of the site.
DV-26441 (unnamed African American cemetery) and Gambell Cemetery	None; cemeteries lack well-defined parcel or easement and were not identified during fieldwork.	Archaeological monitoring during, and/or non-destructive remote sensing prior to, ground-disturbing activities within 100 feet of the recorded cemetery coordinates.

3.10.4. Is there a Section 4(f) use of any historic properties?

The No-Build Alternative would not use any historic properties protected under Section 4(f).

The Build Alternative would not temporarily or permanently incorporate any Section 4(f) historic properties into the transportation system. Therefore, the proposed Project would not substantially impair the features and characteristics that qualify these historic resources for inclusion in the NRHP and afford them protection under Section 4(f).

Appendix H includes detailed information on the types and locations of these properties.

3.11. Would temporary impacts occur due to construction?

While avoidance and minimization measures have been undertaken to minimize impacts to the social, physical, natural and cultural environments, construction of the proposed Project would result in direct temporary impacts to streams, wetlands, state and federally protected species, floodplains, residential and commercial properties and communities. Temporary noise impacts may also be experienced as a result of the proposed construction. Examples of temporary impacts would be detours, short-term lane closures, clearing, staging, fill into WOTUS and access to residences and businesses.

Also, due to the alternative delivery method for this proposed Project, the aforementioned temporary impacts are subject to change based on the selection of a design-build contractor and the subsequent advancement of plans for construction.

3.12. Would the proposed Project have Reasonably Foreseeable Impacts?

In addition to the direct effects discussed earlier in this chapter, transportation projects can also result in reasonably foreseeable impacts. These impacts can include induced growth, such as a new development around a new interchange, or physical encroachments that alter the behavior and function of the affected environment.

In accordance with 42 USC 4332(c), the Project Team has evaluated the potential for reasonably foreseeable impacts for the resources shown in **Table 3-18** and are summarized below.

Table 3-18: Resources Included in Reasonably Foreseeable Impacts Analysis

SOCIOECONOMIC RESOURCES	NATURAL RESOURCES
Existing Land Use	Terrestrial Ecology
Zoning	Invasive Species
Future Land Use	Water Quality
Road Network	Intermittent Streams
Planned Development	Ephemeral Streams and Upland Drainage Features
Relocation of Residents or Businesses	Ponds
Historic Resources	Wetlands and Springs
Economic Conditions	Threatened and Endangered Species
Noise	Migratory Birds

In general, the No-Build Alternative would have no reasonably foreseeable effects to resources either through induced growth or encroachment alteration effects; however, by not meeting the purpose and need of the proposed Project, the No-Build Alternative would not provide the benefits to communities and roadway users that would result from the proposed Project. Increased traffic on local roadways would likely increase congestion and travel times along I-24 and other local roads. The increased congestion would likely result in an increase in crash rates.

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Socioeconomics

The Build Alternative would have minimal potential for impacts related to reasonably foreseeable effects to socioeconomic resources. While development is reasonably foreseeable within the induced growth study area, the ability of the proposed Project to contribute to that development is limited due to the inadequate infrastructure and services to the remaining supply of land. Although the Build Alternative would indirectly change travel patterns, it would not provide new direct access or would only have a limited potential to provide access, to undeveloped land, further limiting the potential for the Build Alternative to induce growth. Buildout conditions in the induced growth study area are also expected to be reached within the next 20 years regardless of whether the Build Alternative is constructed. For these reasons, the potential for the Build Alternative to induce growth is likely moderate.

Past growth and development have resulted in largely developed suburban and urban areas in and around the Project study area. Increased business and employment from past, present and reasonably foreseeable growth and development have benefitted the economy of the area, presenting employment, commercial and educational opportunities. Future transportation projects and development would continue to increase access to community facilities and recreational resources while potentially displacing others. Growth may cause redevelopment pressures.

The Build Alternative would require construction activities, but most activities would be confined to the area around the existing facilities. However, the implementation of standard measures, such as Maintenance of Traffic Plans during construction, would limit the potential adverse effects that could result if the proposed Project construction coincides with construction activities of other planned or future development in the area.

Natural Resources

Similarly for the natural resources, effects resulting from ongoing and future growth in the area, whether induced by the Build Alternative or otherwise, could include conversion of habitat, habitat fragmentation, alterations to waterways, increases in impervious surfaces and effects to water quality. Potential induced growth effects to natural resources could include a loss of streamside buffers, increased runoff and higher risks to structures in or adjacent to a floodplain. Development within the induced growth study area could also result in a change in the abundance and of vegetation, thereby affecting the ability of threatened and endangered species and migratory birds to thrive within this area.

Potential encroachment alteration effects to natural resources are similar to induced growth effects. The Build Alternative could indirectly change vegetative composition within the corridor from introduction of invasive species, changes in light regime from elevated structures and changes in hydrologic regimes from increased impervious surface and alterations to drainage patterns. These changes could displace wildlife from habitat and

food loss, and this may be felt more acutely by threatened and endangered species which may be less resilient to these changes. Overall, adverse effects from induced growth and encroachment alteration are expected to be minor with adherence to federal, state and local regulations, such as compliance with CWA requirements intended to maintain water quality.

The Build Alternative, when considered in the context of its potential to result in induced growth and encroachment effects, may result in adverse effects over time to vegetation, water resources and wildlife (including threatened and endangered species. This may result from additional loss of habitat, habitat fragmentation, introduction of invasive species, water quality impacts and general impacts that change breeding, feeding or sheltering patterns of wildlife. However, federal, state and local regulations generally require avoidance, minimization and mitigation of adverse impacts to natural resources and adherence to permit requirements, such as through the CWA.

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4. AGENCY COORDINATION AND PUBLIC INVOLVEMENT

4.1. What Agency Coordination occurred for the proposed Project?

Agency coordination plays a critical role in the successful delivery of the proposed I-24 Southeast Choice Lanes project, especially when introducing a new strategy like priced-managed lanes and user fees with which many Tennessee agencies may not have wide familiarity. Early and frequent agency coordination is critical with projects of this type.

As outlined in the Tennessee Environmental Streamlining Agreement (TESA) and Public Involvement and Agency Coordination Plan (PIACP), TDOT, in coordination with FHWA, is responsible for the preparation of the EA and the identification of cooperating agencies and participating agencies. This is consistent with the requirements stated in 23 USC 139. The TESA is an agreement between TDOT, FHWA and select permitting and regulatory agencies intended to establish a coordinated planning and project development process for transportation projects in Tennessee in order to achieve a more streamlined and collaborative environmental permitting process built on the regulatory requirements for agency coordination, and involvement that occurs early and throughout the project development process.⁸⁰

TDOT initiated monthly agency coordination meetings in December 2023 to introduce the agencies to the upcoming program of projects and, specifically, the proposed I-24 Southeast Choice Lanes project. These initial meetings allowed TDOT to keep agencies informed while it conducted the initial planning and field studies for the proposed Project. In addition to the preparation of the agency coordination schedule, the agencies also participated in the development of the PIACP to outline and define the requirements and processes to facilitate agency coordination, correspondence and participation, and adhere to the requirements outlined in the NEPA regulations and the TESA.

Table 4-1 below lists the various federal, state, local and tribal agencies engaged with the proposed Project as cooperating and participating agencies outlined in 23 USC 139. The PIACP also outlines the overall project schedule and the process for approval of environmental documents from cooperating and participating agencies. This EA will be distributed to all cooperating and participating agencies, as well as non-governmental organizations, federal, state and local officials and the public for review and comment.

⁸⁰ TDOT, [Tennessee Environmental Streamlining Agreement](#), accessed December 2024.

Please refer to the PIACP in **Appendix V** for further details on the agency approval and concurrence processes.

Table 4-1: Lead, Participating and Cooperating Agencies

Lead Agencies	Cooperating Agencies	Participating Agencies
FHWA Tennessee Division	USACE, Nashville District (permit)	USFWS
TDOT	TDEC (permit)	EPA, Region 4
		TDEC Division of Natural Areas
		National Park Service (NPS)
		TN-SHPO
		TWRA
		Tennessee State Parks (TSP)
		Native American Tribes (interests in subject counties)

The response to the **Letter of Intent** shows FHWA's concurrence with a project sponsor's class of action recommendation for a proposed project.

On June 7, 2024, TDOT initiated a letter to provide an LOI to FHWA requesting FHWA's concurrence to initiate NEPA and TDOT's recommendation to develop an EA. FHWA provided concurrence with this request and class of action recommendation on June 17, 2024. TDOT informed agencies of FHWA's concurrence for the proposed Project to proceed as an EA during the June 25, 2024 Agency Coordination

Meeting. Following this notification, participating and cooperating Agencies received Letters of Invitation on June 26, 2024 to participate in official agency coordination during EA development. A copy of the LOI and concurrence from FHWA is in **Appendix A**.

4.1.1. Were there Agency Meetings for the proposed Project?

The Project Team hosted multiple Agency Coordination Meetings for the proposed Project beginning in December 2023 through August 2025. A summary of those meetings and the topics discussed, along with the meeting materials, minutes and relevant communications are in **Appendix X**.

4.1.2. Was there Agency Correspondence and Concurrence for the proposed Project?

The Project Team provided opportunity for agency correspondence via monthly coordination meetings and formal concurrence point (CP) request letters. CP1 included the

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Project purpose and need and Study Area Package, and a request for formal concurrence on the package prior to the development of alternatives. CP2 served as the Alternatives to be Evaluated package, included modifications to the topics listed below and requested concurrence on:

- Modifications to CP1
- Project Study Area
- Project purpose and need.

Table 4-2 outlines the agencies that received the CP request letters and the related responses. The CP request letters, related agency correspondence and agency responses are in **Appendix U**.

Table 4-2: Agency Responses to CP Request Letters

Concurrence Point 1 – Delivered June 26, 2024	
Recipients	Responses
USACE	Signed acknowledgment of CP1 and agreed to be a cooperating agency.
EPA	Provided comments on CP1, purpose and need, study area and agreed to be a participating agency.
USFWS	Agreed to be a participating agency.
TWRA	Signed acknowledgment of CP1 and agreed to be a participating agency.
TN-SHPO	Agreed to be a participating agency.
TDEC	Signed letter agreeing to be a participating agency and comments regarding air pollution, solid and hazardous waste, water resources and archaeology.
Tennessee Valley Authority (TVA)	Declined to be a cooperating agency and stated TVA had no land rights along the corridor and no jurisdiction based on the Interpretive Rule.
U.S. Coast Guard	This agency had no action or interest in the proposed Project and will not be a cooperating agency.
U.S. Department of Agriculture	This agency had no action or interest in the proposed Project and will not be a participating agency.

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Concurrence Point 2 – Delivered August 28, 2024	
Recipients	Responses
USACE	Signed acknowledgment of CP2 and additional comments were returned on September 27, 2024.
EPA	EPA did not respond to the request for acknowledgement of CP2.
USFWS	Signed acknowledgment of CP2 was returned on September 27, 2024.
TWRA	Signed acknowledgment of CP2 was returned on September 24, 2024.
TN-SHPO	Signed acknowledgment of CP2 and additional comments were returned on September 24, 2024.
TDEC	Signed acknowledgment of CP2 was returned on September 24, 2024.

4.2. Public Involvement

The public involvement process focuses on creating ample opportunities to educate the public and engage stakeholders as well as mitigating potential barriers that may hinder meaningful feedback. The Project Team developed a robust PIACP that details the goals and strategies for public involvement and will guide the Project Team through the environmental review process. The PIACP meets all federal, state and local requirements and is compliant with TDOT’s *Public Involvement Plan: A Statewide Transportation Public Participation Guide*.⁸¹ The Project Team will update the PIACP throughout Project development to reflect changing strategies based on results of outreach efforts, engagements and performance. A copy of the PIACP is in **Appendix V**.

4.2.1. What Community Outreach occurred?

As summarized in the sections below, the Project Team has conducted extensive community outreach, including more than 30 events between July 2024 and October 2025.

⁸¹ TDOT, <https://www.tn.gov/tdot/government-how-do-i/encourage-public-involvement.html>, accessed December 2024.



Project Team at a community outreach event.

The Project Team is committed to providing a safe and reliable transportation network while balancing the impacts on the natural and human environment. Recognizing communities may face significant barriers to participation, the Project Team included community outreach components into the PIACP to better address direct or reasonably foreseeable impacts on affected neighborhoods. This reinforced the importance of establishing relationships and gathering feedback which can be used to inform decisions on mitigation strategies and other aspects of the proposed Project. Previous and ongoing outreach efforts are further documented within the PIACP, which includes targeted mailings, stakeholder and religious organization meetings, community events, tabling and information booths, distributions of flyers and printed materials, surveys and more. Additionally, a comprehensive list of the community outreach events is included in Table 4-3, attached to **Appendix V**.

For example, at the Plaza Mariachi Back-to-School Event, the Project Team passed out activity books and Project materials to 1,200 children and 500 accompanying adults.

This event was hosted by the Hispanic Family Foundation to provide school supplies and backpacks to 3,400 children. Project materials were translated into Spanish and a translator was on site to assist with communication with attendees.



Project Team at a community outreach event.

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WHAT OUTREACH OCCURRED AROUND TRAFFIC AND REVENUE STUDIES?

A Stated Preference Survey was conducted between March 10 and April 7, 2024, to collect feedback from residents using the I-24 Southeast corridor between Nashville and Murfreesboro. The purpose of the survey was to estimate the willingness of travelers along the I-24 Southeast corridor to utilize Choice Lanes, understand travel habits and destinations, gather opinions of the proposed Project and estimate value of time for passenger vehicle users. A total of 60,000 mailed postcard invitations with unique passwords were sent to randomly selected households across 66 zip codes within the corridor to collect survey responses. In addition to the mailed postcards, survey links were available on the Project website and a market research company recruited survey respondents.

In accordance with industry best practice, the survey dataset was evaluated for inconsistencies or outliers that would distort the survey’s purpose and findings. The National Institute of Standards and Technology defines an outlier as an observation that lies an abnormal distance from other values in a random sample from a population.⁸² To identify outliers, survey responses were compared with each other in order to identify observations that differed significantly from most other responses or showed evidence of inconsistent behavior or logic. For example, responses completed in less than six minutes likely indicated respondents did not thoroughly read all the questions and data. Other examples include responses with reported travel times inconsistent with survey travel time parameters and respondents who demonstrated inconsistent behavior in answering questions. Survey responses that were identified as outliers were discounted to protect data accuracy. A total of 2,475 responses were collected during the survey window, but 623 responses were discounted based on outlier analysis and resulted in a total of 1,852 usable surveys.

A summary of key survey questions is included in **Figure 4-1 – 4-6** below. As shown in **Figure 4-1**, respondents utilize the I-24 Southeast corridor for a variety of reasons from commuting for work, traveling for recreation, shopping and other reasons to a variety of destinations as shown in **Figure 4-2**.

⁸² National Institute of Standards and Technology, [What are outliers in the data?](#), accessed December 2024.

Figure 4-1: Trip Purpose

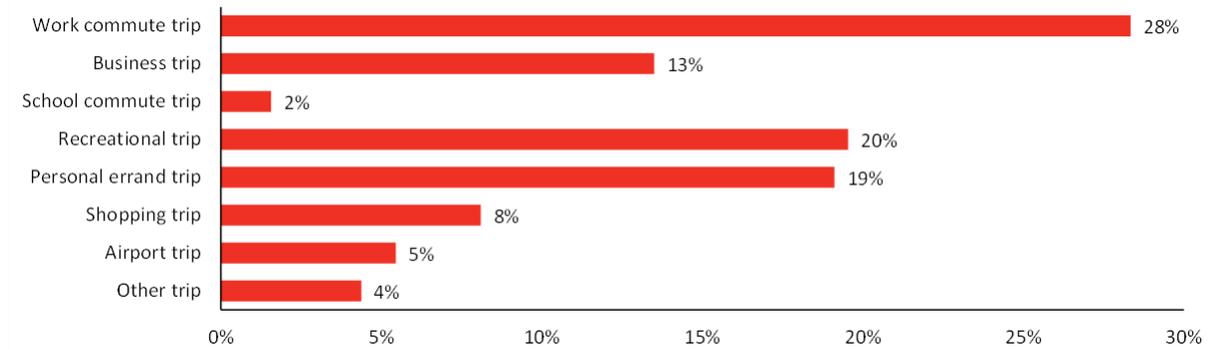
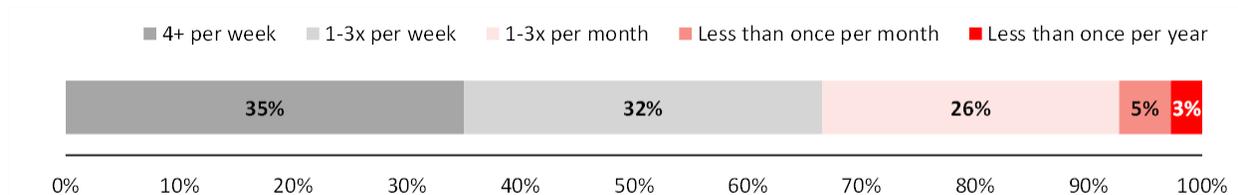


Figure 4-2: Top Origins and Destinations by Community

Community	Origins		Destinations		Total	
	Count	Percent	Count	Percent	Count	Percent
Nashville (Davidson County)	698	38%	915	49%	1,613	44%
Murfreesboro (Rutherford County)	466	25%	401	22%	867	23%
Smyrna (Rutherford County)	150	8%	152	8%	302	8%
La Vergne (Rutherford County)	92	5%	79	4%	171	5%
Brentwood (Williamson County)	26	1%	36	2%	62	2%
All others	420	23%	269	15%	689	19%
Total Responses	1,852	100%	1,852	100%	3,704	100%

Figure 4-3: I-24 Trip Frequency



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Figure 4-4: Tendency to Select Facility Types by Experience with User Fee Facilities

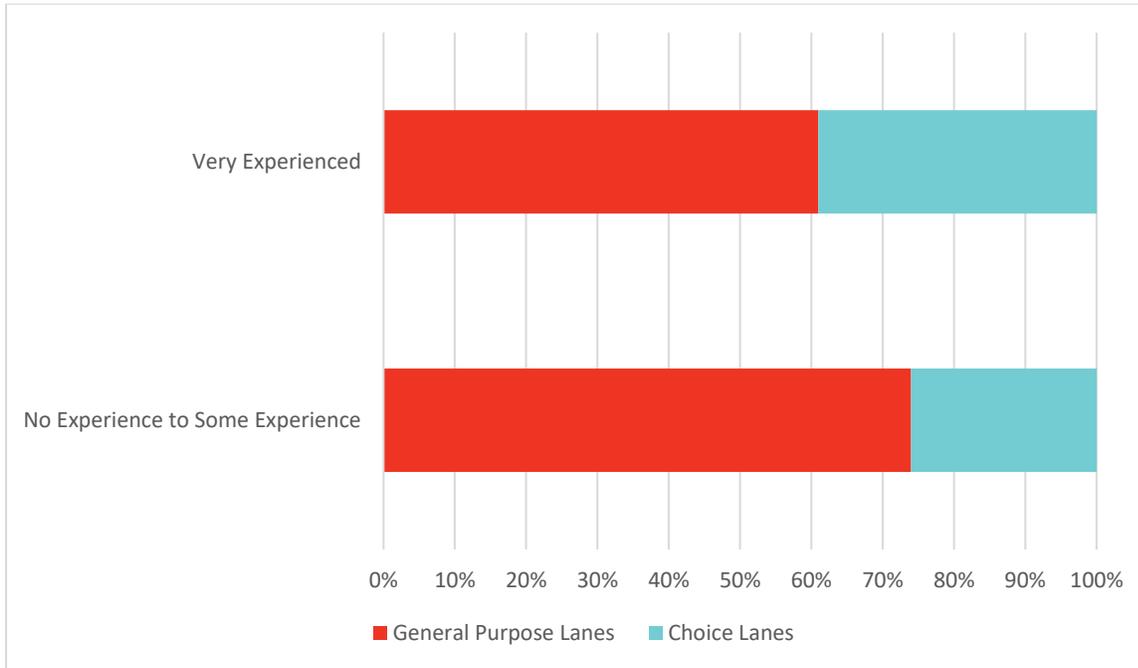
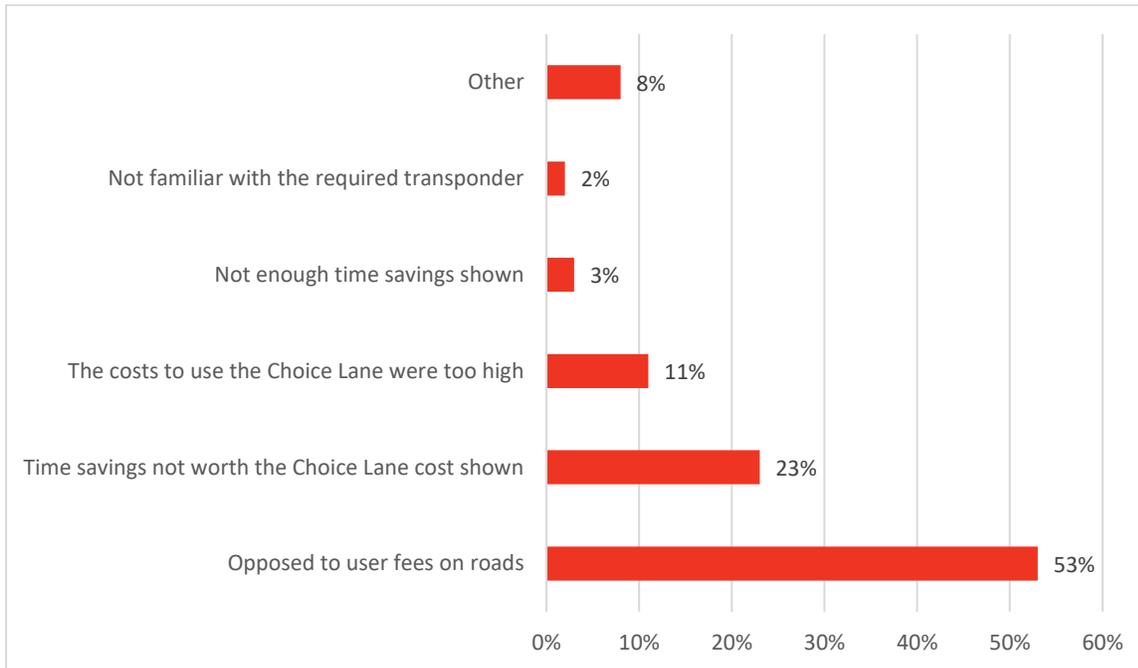


Figure 4-5: Reason for Unwillingness to Select the Choice Lanes



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Figure 4-6: Project Opinion

Project Opinion	Count	Percent
Strongly approve	298	16%
Somewhat approve	413	22%
Neutral	308	17%
Somewhat oppose	291	16%
Strongly oppose	542	29%
Total Responses	1,852	100%

WHAT OUTREACH OCCURRED AROUND VISUAL IMPACTS OF THE PROPOSED PROJECT?

The Project Team developed a Visual Preferences Survey (VPS) to efficiently collect feedback from the public and stakeholders and identify visual impacts of the proposed Project and potential mitigation measures. The VPS was conducted between August 12 and September 19, 2024, with a total of 55 completed surveys and was completed in accordance with FHWA's *Guidelines for the Visual Impact Assessment of Highway Projects*.⁸³ The questions, layout and design of the survey are carefully developed to meet all requirements and industry best practices.⁸⁴ These efforts included, but were not limited to:

- Using simple, easy-to-understand language based on local socio-economic data
- Organizing questions into categories or buckets for a cohesive and logical flow
- Presenting questions in a fair and objective manner to avoid influencing responses
- Utilizing clear color contrasts between text and background
- Including an introduction and purpose section to inform respondents of how their responses and feedback would be utilized

Once feedback was provided, the Project Team analyzed the population's characteristic data to identify additional communication needs and understand the appropriate reading level needed to reach communities and stakeholders along the corridor. Then, the Project Team developed digital and hard copy versions of the survey to reach a wide audience. The hard copy versions of the VPS were used to accommodate impacted communities and the public that do not have reliable or consistent internet access or devices. A sample of responses is included in **Figure 4-7** and **Figure 4-8** below. Detailed results are included in **Appendix W**.

The Project Team will include Visual Impact stations during each of the public hearing events to engage the public and stakeholders and establish the general visual parameters for the proposed Project. At these stations, the participants will be able to perform a

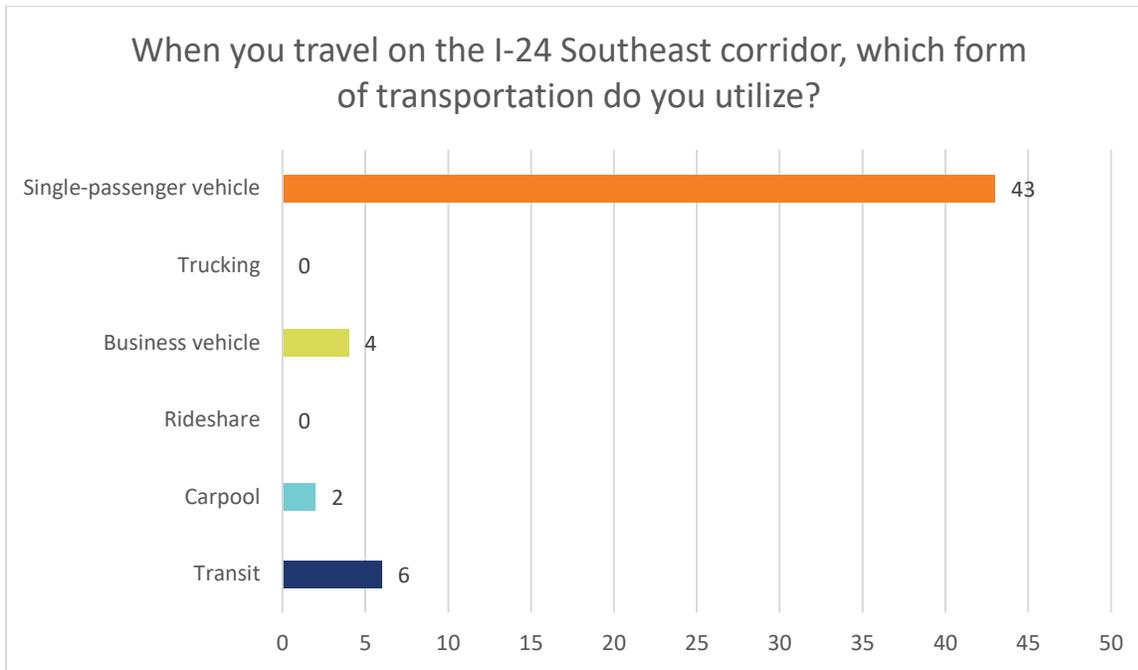
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⁸³ FHWA, [Guidelines for the Visual Impact Assessment of Highway Projects](#), accessed December 2024.

⁸⁴ Virginia Board for People with Disabilities, [Accessible Survey Design Checklist](#), accessed December 2024.

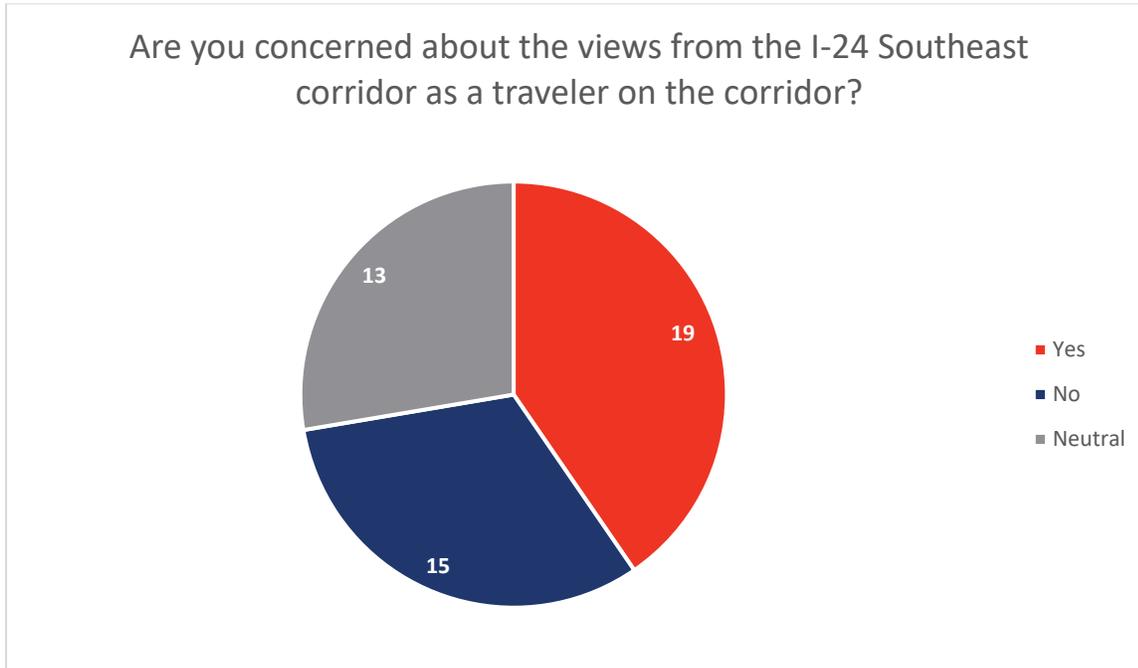
corridor walk-through with renderings to provide a sense of visual changes while working to identify the needs and desires of the surrounding community. Project Team members will be present to answer questions and gather meaningful feedback from the participants. Survey questions will be incorporated with the Project comment card in order to increase engagement. The VPS will follow similar standards that have been used for other project surveys.

Figure 4-7: When you travel on the I-24 Southeast corridor, which form of transportation do you utilize?



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Figure 4-8: Are you concerned about the views from the I-24 Southeast corridor as a traveler on the corridor?



4.2.2. What Public Meetings occurred?

The Project Team held six in-person public information meetings (PIMs) and two online virtual public meetings (VPM). The first three in-person PIMs and the VPM occurred in August 2024 with a comment period that ran from August 14 to September 19, 2024. A virtual public meeting room (VPMR) (**Figure 4-9**) was also available on the Project website from August 14 to September 19, 2024. A recording of the August 14, 2024, live virtual public meeting was available on the Project website and had a total of 534 views during the comment period. Three additional PIMs were held and a VPM was available on the Project website from September 30 to October 23, 2025⁸⁵. The public comment period following these meetings closed on October 23, 2025. Summaries for the in-person and virtual public meetings are available in **Appendix W** with additional information on comments, outreach, public meeting materials and more. **Table 4-3** provides an overview of the public meetings.

⁸⁵ In response to continued interest expressed by the public in the proposed project and the recent refinements to the project scope and proposed build and no-build alternatives under consideration in the EA, pursuant with supporting NEPA regulations (23 CFR 771.111 and 23 USC 139(f)), TDOT is reopening the public comment period for the Fall 2025 public meeting events to from November 5 – 19, 2025. Upon receiving and responding to the additional comments, Chapter 4 and supporting appendices will be updated accordingly.

Figure 4-9: Virtual Public Meeting Room

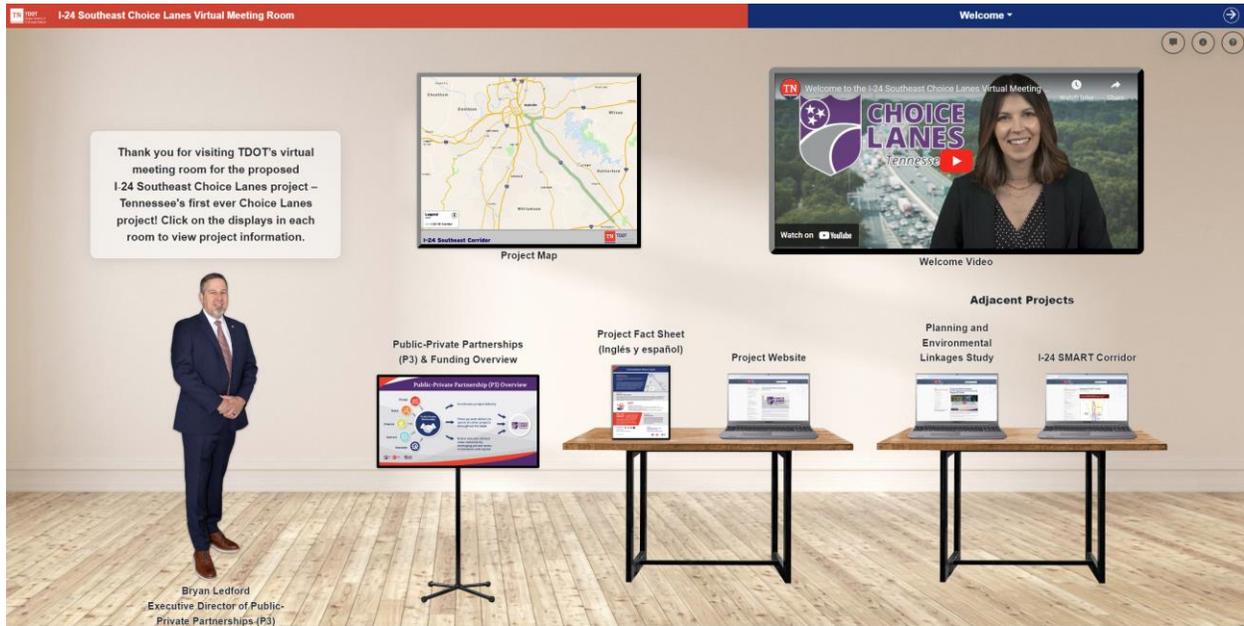


Table 4-3: Public Meetings

Event	Date Time	Location	Attendance
VPM 1	August 14, 2024	Virtual	534 (266 live, 268 on-demand)
VPMR	August 14 – September 19, 2024	Virtual	180
PIM 1	August 21, 2024 5 p.m. – 7 p.m.	Smyrna Event Center, 100 Sam Ridley Pkwy, Smyrna, TN 37167	82
PIM 2	August 28, 2024 6 p.m. – 8 p.m.	Fairgrounds Nashville, 625 Smith Ave, Nashville, TN 37203	33
PIM 3	August 29, 2024 11 a.m. – 6 p.m.	Southeast Community Center, 5260 Hickory Hollow Pkwy, Ste 202, Nashville, TN 37013	40
VPM 2	September 30 – October 23, 2025	Virtual	352
PIM 4	September 30, 2025, 5:30 p.m. – 7:30 p.m.	Smyrna Event Center, 100 Sam Ridley Pkwy, Smyrna, TN 37167	109
PIM 5	October 1, 2025, 5:30 p.m. – 7:30 p.m.	Coleman Park Community Center, 384 Thompson Ln, Nashville, TN 37211	44

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Event	Date Time	Location	Attendance
PIM 6	October 2, 2025, 5:30 p.m. – 7:30 p.m.	Southeast Community Center, 5260 Hickory Hollow Pkwy, Ste 202, Nashville, TN 37013	33

Each of the PIMs listed in **Table 4-3** was an open-house meeting where attendees were welcomed and asked to sign in, given Project information and an explanation of the open house format and encouraged to engage the Project Team, ask questions and submit comments. They were then directed to interact with the Project Team and visit stations with information on topics like the Project overview/P3s, the TMA, environmental process, noise and traffic studies and review design concepts. Attendees were also able to use interactive smartboards to review the Build Alternative⁸⁶.



Project Team using PIM interactive screens.

The Project Team collected public comments at a dedicated station at each PIM. The communications and advertising methods used to inform the public about the PIMs, notification of the public comment period and PIM outreach efforts included postings on the website, newsletters, emails and postcards.

For the 2024 meetings, the Project Team collected a total of 522 comments, including 440 survey responses, during the comment period. For the 2025 meetings, the Project Team collected a total of 195 comments during the comment period. Comments were collected at in-person meetings through written comment forms and the 2024 meetings included a court reporter. In addition to the in-person meetings, comments were collected online via the Public Involvement Management Application (PIMA).

The overall themes of the comments were very similar between the 2024 and 2025 public meetings. Generally, participants expressed concerns over right-of-way acquisition, the role of public transit in Choice Lanes, inequitable access to Choice Lanes based on income, temporary impacts due to construction, design concerns/inquiries, environmental impacts and concerns/inquiries about Choice Lanes operations and user fee enforcement.

Appendix W includes further detail on the comments received following the PIMs.

⁸⁶ The 2024 meetings presented attendees with information on Build Alternatives 1 and 2. Build Alternative 1A, which further refined the less-impactful Alternative 1, had not yet been developed at the time of the 2024 public meetings. Build Alternative 1A was presented at the 2025 meetings.

4.2.3. Was there a Public Hearing?

To achieve greater participation and meaningful public involvement and to be compliant under 23 CFR 771.111(h) the Project Team plans to host in-person Public Hearings in 2026, for the public to review and provide feedback on the approved EA and other Project materials. Public Hearing attendees will have the option of submitting comments in writing or verbally to a court reporter and the Project Team will accept comments for at least 21 days after the last in-person Public Hearing date. The Project Team will provide a formal presentation and answers to questions through a formal question-and-answer period during each live event and provide a summary of comments and responses on the proposed Project web page. In accordance with TDOT policies, the Project Team will distribute the EA to cooperating and participating agencies, appropriate public facilities such as libraries, city halls or schools, and to individuals who have requested a copy as they are unable to access the information by traditional/customary means. In accordance with 23 CFR 771.119(e) copies of the EA will be available for public review at least 15 days prior to the Public Hearing. The Project Team will also publish a public notice for the Public Hearing in local newspapers, TDOT's social media channels and websites, and provide opportunities for the public to review and provide feedback on the EA and other Project materials virtually and in-person.

4.2.4. Was there Stakeholder Outreach?

The Project Team collaborated with established local connections and partner agencies to review past and ongoing projects in the region, utilize local knowledge, conduct field assessments and complete extensive research to identify appropriate stakeholders that represented an assortment of views, backgrounds and perspectives for the proposed Project. Following the identification of the stakeholders, the Project Team conducted extensive outreach and engagement efforts to invite participation, educate on the proposed Project and define the role of stakeholders.

The March, August and December stakeholder meetings were used by the Project Team to introduce stakeholders to various aspects of the proposed Project. The goal of each stakeholder meeting was to be engaging, informative and valuable to both the Project Team and stakeholder attendees. These meetings provided the opportunity for the stakeholders to speak with members of the Project Team, ask questions and provide feedback that was important for the organization represented. Common themes and questions during these meetings focused on understanding how Choice Lanes would operate, the costs or fees associated with Choice Lanes, operations of managed lanes and P3 operations. A stakeholder packet was provided to stakeholders with Project information that could be shared within their organizations to increase Project awareness and participation.

A list of stakeholders, additional details on the identification and engagement process and materials from the stakeholder meetings are included in **Appendix X**. See **Table 4-4** for a summary of the stakeholder meetings that have occurred to date for the proposed Project.

Table 4-4: Formal Stakeholder Meetings^{87,88,89}

Meeting	Date	Location	Number of Attendees	Topics
Stakeholder Meeting 1	March 21, 2024	Virtual	30	TMA, Choice Lanes overview, P3, potential corridors, Project overview, timeline, stakeholder coordination and ongoing engagement efforts.
Stakeholder Meeting 2	August 7, 2024	Virtual	20	Choice Lanes overview, P3, Transit benefits, Project overview, alternatives, typical sections, user fees, timeline, public meetings and public feedback. Provided a stakeholder packet requesting assistance in sharing information about the upcoming public meetings.
Stakeholder Meeting 3	December 9, 2024	Virtual	16	Choice Lanes overview, P3, Transit benefits, Project overview and ongoing community engagement efforts. Requested participation in the community survey and the upcoming visual impacts workshop.

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⁸⁷ In addition to the three formal stakeholder meetings, the Project Team provided Speakers Bureau presentations to educate stakeholders about the proposed Project, which covered topics such as P3s, noise, and ROW.

⁸⁸ The Project Team also conducted monthly coordination meetings with the local MPO between February and November 2024, and TDOT conducted a Project workshop with the MPO on December 4, 2024 as additional stakeholder coordination.

⁸⁹ As part of additional stakeholder coordination, TDOT gave project updates at various Transportation Policy Board meetings. Furthermore, GNRC leadership attended a virtual stakeholder update meeting hosted by TDOT in early December 2025 and will be invited to a briefing/update before the public hearings. **Appendix X** includes a summary of all stakeholder outreach undertaken by TDOT.

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5. ENVIRONMENTAL COMMITMENTS

This chapter outlines the commitments that have been recommended to minimize the social, cultural, natural and physical environmental impacts of the proposed Project. The anticipated unavoidable impacts and associated environmental commitments discussed below for the proposed I-24 Southeast Choice Lanes project are Contractor- (sometimes referred to as developer or design-build team) or TDOT- (sometimes referred to as Owner) responsible measures that must be adhered to and included in the contract for Project implementation. Further refinement in the identification of roles and responsibilities (i.e., TDOT or the Contractor) for the proposed commitments and mitigations will be developed during the procurement phase and defined in the Concession Agreement. Updates to the Environmental Commitments Table (**Table 5-1**: Environmental Commitments Tables below) will be made where applicable. In addition to the commitments below, mitigation would be required as a result of the “May affect, likely to adversely affect” finding to Nashville crayfish as well as the adverse visual effect to Mill Creek Baptist Church/Whitsett Cemetery and Rogers Manufacturing Plant.

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5.1. What Environmental Commitments have been made?

Table 5-1: Environmental Commitments Tables

A. Commitments or Requirements (Status: Pre- and Post – Complete or Incomplete; During – Signature Required)

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-1	Pre-, During and Post Construction	<p>Construction Restrictions See Plan Notes for Construction Restrictions. The Developer shall ensure that no construction-related activities, other than those shown on the accepted Construction Documents, occur within the boundary of environmental resources. Any impacts to these resources proposed beyond the high visibility fencing or ROW shall require an environmental re-evaluation. The Developer shall delineate ESAs with high visibility fencing.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>
A-2	Pre-, During and Post Construction	<p>User Fee TDOT will offer a customer service phone number and access to a physical office where motorists can manage their user fee accounts, including payment options.</p>	TDOT Environmental Division	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-3	Pre-Construction	<p>Visual Impacts Prior to completing the NEPA decision document, TDOT will hold a Visual Impacts Workshop to inform the development of mitigation measures that would be proposed and/or incorporated into the design or through commitments made in the NEPA decision document.</p> <p>Prior to construction, TDOT will coordinate with the identified members of the public and affected stakeholders based on the Visual Impacts Assessment and the Visual Impacts Workshop Station to communicate the mitigation proposed based on the final design.</p>	TDOT Environmental Division	Negligible	Incomplete <hr/> Signature Required
A-4	During Construction	<p>Construction Impacts Construction activities would generate intermittent and temporary construction related noise, MSAT emissions and dust. These temporary effects would be minimized using standard best management practices, such as limiting construction vehicle idling and using water to suppress dust.</p>	Developer	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-5	Pre-Construction	<p>Noise Barriers Based on the preliminary concept plans noise barriers are determined to be preliminarily reasonable and feasible, and included in those plans. Each preliminary barrier’s design, location and feasibility/reasonableness will be reevaluated prior to final design. If during final design it is determined that noise abatement is not feasible and reasonable, the noise wall may not be constructed. The final decision on the installation of any abatement measures(s) will be made upon completion of the proposed Project’s final design in accordance with TDOT’s Noise Guidelines.</p>	TDOT Environmental Division	TBD	<p>Incomplete</p> <hr/> <p>Signature Required</p>
A-6	Pre-Construction	<p>Noise Barriers Where removal of existing noise barriers is required, develop a plan detailing the removal of existing noise barriers and construction of proposed noise barriers.</p>	Developer	TBD	<p>Incomplete</p> <hr/> <p>Signature Required</p>
A-7	During Construction	<p>Protected Species - Bats and Migratory Birds Tree clearing would be restricted to the period between October 1 and March 31 to avoid impacts to potential roost sites.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-8a	Pre-Construction	<p>Protected Species – Streamside salamander Additional surveys for the Streamside salamander are anticipated for the 2025/2026 breeding season (December 15 – March 15) and would be completed prior to approval of the NEPA decision document.</p>	TDOT Environmental Division	Negligible	Incomplete <hr/> Signature Required
A-8b	During Construction	<p>Protected Species – Streamside salamander For areas determined to be suitable habitat for Streamside salamander, in-stream work shall be prohibited from December 15 to June 1.</p>	Developer	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-9	During Construction	<p>Protected Species – Nashville Crayfish Pre-construction surveys will be required for presence of Nashville Crayfish in all streams identified in the Biological Assessment (STRs - 5, 5.1, 5.4, 7, 12, 13, 14, 15, 21, 25, 33, 34, and 43). In-stream work shall be avoided during the seasonal restriction period between October 1 to May 31. For any in-stream work conducted between June 1 and September 30, sweeps must take place prior to construction and collected specimens relocated to suitable habitat. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-10	Pre-Construction, During Construction	<p>Protected Species – Brawley’s Fork Crayfish Pre-construction surveys for presence of Brawley’s Fork Crayfish in perennial features of the West Fork of the Stones Watershed (STR-83a, STR-83b). If found, avoid in-stream work during the spawning season from September 1 to June 30. If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work 14 days in advance of construction and collected specimens relocated to suitable habitat. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.</p>	Developer	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-11	Pre-Construction, During Construction	Protected Species – Redband darter Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-5, 5.1, 5.4, 7, 12, 13, 21, 25, 33, 34, 43, 67, 74, 77, 79, 81, 82). If present, avoid in-stream work during the spawning season (March 1 – April 30). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Sweeps and in-stream work exceptions during the spawning season are only permitted on STRs-67, 74, 77, 79, 81 and 82. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.	Developer	Negligible	Incomplete <hr/> Signature Required
A-12	Pre-Construction, During Construction	Protected Species – Smallscale darter Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-67, 74, 77, 79, 81, 82, 83a). If present, avoid in-stream work during the spawning season (March 15 – July 31). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.	Developer	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-13	Pre-Construction, During Construction	Protected Species – Bedrock shiner Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-67, 74, 77, 79, 81, 82, 83a). If present, avoid in-stream work during the spawning season (May 15 – June 30). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.	Developer	Negligible	Incomplete <hr/> Signature Required
A-14	Pre-Construction, During Construction	Protected Species – Southern cavefish Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STR-83a). If present, avoid in-stream work during the spawning season (April 1 – May 31). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.	Developer	Negligible	Incomplete <hr/> Signature Required
A-15	Pre-Construction, During Construction	Protected Species – Slabrock darter Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-5.1, 7, 12, 13, 21, 25, 33, 34, 43,	Developer	Negligible	Incomplete <hr/>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		<p>67, 74, 77, 79, 81, 82). If present, avoid in-stream work during the spawning season (April 15 – June 30). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Sweeps and in-stream work exceptions are not permitted on STRs-7, 12, 13, 21, 25, 33, 34 and 43 from April 15 – May 31. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.</p>			<p>Signature Required</p>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-16	Pre-Construction, During Construction	<p>Protected Species – Stone darter</p> <p>Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-1, 3, 5, 5.1, 5.4, 7, 12, 13, 14, 15, 21, 25, 27, 33, 34, 43, 66, 67, 72, 74, 77, 79, 81, 82). If present, avoid in-stream work during the spawning season (March 15 – July 31). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Sweeps and in-stream work exceptions are not permitted on STRs-5, 5.1, 5.4, 7, 12, 13, 14, 15, 21, 25, 33, 34 and 43 from March 15 – May 31. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>
A-17	Pre-Construction, During Construction	<p>Protected Species – Redtail chub</p> <p>Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-1, 5, 5.1, 7, 12, 13, 14, 15, 21, 33, 34, 43, 67, 74, 77, 79, 81, 82, 83a). If present, avoid in-stream work during the spawning season (May 15 – June 30). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Sweeps and in-stream work</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		exceptions are not permitted on STRs-5, 5.1, 7, 12, 13, 14, 15, 21, 33, 34, and 43 from May 15 – May 31. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.			
A-18	Pre-Construction, During Construction	<p>Protected Species – Slenderhead darter</p> <p>Pre-construction surveys for species presence in streams to be impacted that have suitable habitat (STRs-1, 3, 5, 5.1, 7, 12, 13, 21, 33, 34, 43, 67, 74, 77, 79, 81, 82, 83a). If present, avoid in-stream work during the spawning season (March 15 – July 31). If in-stream work must take place during the spawning season, sweeps must take place prior to in-stream work and collected specimens relocated to suitable habitat. Sweeps and in-stream work exceptions are not permitted on STRs-5, 5.1, 7, 12, 13, 21, 33, 34 and 43 from March 15 – May 31. Surveys and sweeps must be conducted by qualified individuals with appropriate permits.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-19	Pre-Construction	<p>Protected Species – Glade inhabiting plant species (Pope’s sand parsley, Hairy rock-cress, Pyne’s ground-plum, Tennessee milk-vetch, Flat-stemmed spikerush, Limestone fame flower, Yellow sunnybell, Limestone bluestar, Carolina anemone, Davis’ sedge, White prairie clover, Leafy prairie clover, Tennessee cone flower, Evolvulus, Missouri primrose, Eastern yampah, Glade cleft phlox, Southern prairie dock, Sand grape, Hairy fimbristylis.</p> <p>For impacted glade areas, two surveys, late spring and early fall, are required to determine species presence. If avoidance of impacts is not possible, relocations of individuals will be required prior to construction activities. Developer to coordinate timing surveys with TDOT Environmental Division in advance of any construction activities and will develop relocation plan of required populations.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

DELIBERATIVE

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-20	Pre-Construction	<p>Protected Species – Water stitchwort For impacted seep habitats, appropriately timed surveys will occur in early April to late June to determine species presence. If present, impacts will be avoided, or relocations will occur if avoidance is not possible. Developer to coordinate timing surveys with TDOT Environmental Division in advance of any construction activities and will develop relocation plan of required populations.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-21	Pre-Construction	<p>Protected Species – Duck River bladderpod and Stones River bladderpod Surveys will occur in March – April in areas of suitable habitat to determine species presence. If found in areas to be impacted, the top six inches of the topsoil will be removed from the area of impact and relocated to suitable habitat outside the area of impact to preserve the seedbank for these species.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-22	During Construction	<p>Invasive Species The Developer and TDOT would take measures to prevent or minimize the spread of invasive species as appropriate for the time of year, in adherence with Tennessee Standard Specifications Section 201.03, Clearing and Grubbing.</p>	TDOT/Developer	Negligible	Incomplete <hr/> Signature Required

DELIBERATIVE

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-23	Pre-construction, During Construction	<p>Archaeological Resources: Site 40DV750</p> <p>High visibility fencing shall be installed within 10' of the present and proposed ROW to avoid any construction activities within the site boundary. Additionally, archaeological monitoring will be required within the site boundary if the construction extends outside of the existing and proposed ROW.</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>
A-24	Pre-construction, During Construction	<p>Mill Creek Baptist Church/Whitsett Cemetery</p> <p>High visibility fencing shall be installed from the edge of pavement plus 85' along the northern boundary and within 50' of the northern boundary of the present and any proposed ROW to avoid any construction activities within the site boundary. High visibility fencing shall also be installed from edge of pavement along the eastern boundary to Old Glenrose Avenue and within 50' of the eastern boundary and present and any proposed ROW to avoid any construction activities within the site boundary. Archaeological monitoring and non-destructive, GPR remote sensing investigations will be required within 50' of the north and east parcel boundary prior to</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

DELIBERATIVE

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		ground-disturbing activities. Additionally, the northeast corner of the parcel that falls within the right-of-way and directly adjacent to I-24 shall be avoided.			
A-25	Pre-construction, During Construction	Carper Cemetery High visibility fencing shall be installed 10' around the existing wall/fence for the protection of this cemetery. Additionally, archaeological monitoring and non-destructive, GPR remote sensing investigations will be required prior to any ground disturbing activities to target the areas north, east, and south of the known cemetery parcel boundaries should construction activities extend into the known cemetery boundaries.	Developer	Negligible	Incomplete <hr/> Signature Required
A-26	Pre-construction, During Construction	Mount Ararat Cemetery/Greenwood Cemetery West/Hartman Cemetery Archaeological monitoring and non-destructive, GPR remote sensing investigations will be required between the northeast corner of the property fence and Rundle Avenue prior to any ground disturbing activities to target the portions of the cemetery closest to the I-24 ROW.	Developer	Negligible	Incomplete <hr/> Signature Required

DELIBERATIVE

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-27	Pre-construction, During Construction	<p>Baker-Goodrich Cemetery High visibility fencing shall be installed along the present ROW to avoid construction activities within these cemetery boundaries. Archaeological monitoring and non-destructive, GPR remote sensing investigations will be required within the proposed ROW and within 25' of what is shown as the parcel boundary and that is not constrained by the slope of the property.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-28	Pre-construction, During Construction	<p>Unnamed African American Cemetery & Gambell Cemetery High visibility fencing shall be installed within 10' of the present and proposed right-of-way to avoid construction activities within these cemetery boundaries.</p> <p>Additionally for the Unnamed African American Cemetery, archaeological monitoring will be required prior to any ground disturbing activities to target the areas north, east, and south of the known cemetery boundary should construction activities extend into the known cemetery boundary.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-29	Pre-construction, During Construction	<p>Historic Resources: For the protection of the following resources: Mount Olivet Cemetery, Historic Mount Ararat/Greenwood West Cemetery,</p>	Developer	Negligible	Incomplete <hr/>

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		<p>Greenwood Cemetery, Calvary Cemetery, Titan Logistics, American Bread Company, Printer Industry Association of the South, Glencliff United Methodist Church, Hill-Roulhac Cemetery, Lions Club of Tennessee Headquarters, Rogers Manufacturing Plant, Kenworth Building, Ebenezer AME Church, Shoney's Headquarters, Mill Creek Baptist Church Cemetery/Whitsett Cemetery, Saint Luke Primitive Baptist Church, and Holloway-Moore Farm Historic District.</p> <p>High visibility fencing shall be used to avoid any construction activities within the National Registered boundary.</p>			<p>Signature Required</p>
A-30	Pre-construction, During Construction	<p>Mill Creek Baptist Church/Whitsett Cemetery</p> <p>High visibility fencing shall be installed from the edge of pavement plus 85' along the northern boundary and within 50' of the northern boundary of the present and any proposed ROW to avoid any construction activities within the site boundary. High visibility fencing shall also be installed from edge of pavement along the eastern boundary to Old Glenrose Avenue and within 50' of the eastern boundary and present and any proposed ROW to avoid any construction</p>	Developer	Negligible	<p>Incomplete</p> <hr/> <p>Signature Required</p>

DELIBERATIVE

	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		activities within the site boundary. Archaeological monitoring and non-destructive, GPR remote sensing investigations will be required within 50' of the north and east parcel boundary prior to ground-disturbing activities. Additionally, the northeast corner of the parcel that falls within the right-of-way and directly adjacent to I-24 shall be avoided.			
A-31	Pre-construction, During Construction	Mount Ararat Cemetery/Greenwood Cemetery West Archaeological monitoring and non-destructive, GPR remote sensing investigations will be required between the northeast corner of the property fence and Rundle Avenue prior to any ground disturbing activities to target the portions of the cemetery closest to the I-24 ROW.	Developer	Negligible	Incomplete <hr/> Signature Required
A-32	Pre-Construction, During Construction	Historic Resources Prior to construction and approval of the NEPA decision document, TDOT will prepare and ratify a Memorandum of Agreement (MOA) for the visual adverse effects to Mill Creek Baptist Church Cemetery/Whitsett Cemetery and Rogers Manufacturing Plant properties.	TDOT Environmental Division	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
		TDOT will also complete any mitigation required by the MOA based on timeframes specified in the MOA.			
A-33	Pre-construction	HazMat Remediation will be required for the six high-risk sites. Phase II investigations and site assessments may be required for the sixteen low-risk sites and any additional sites that may be identified as a result of final design changes.	Developer	Negligible	Incomplete <hr/> Signature Required
A-34	Pre-construction, During Construction, Post-Construction	Public Involvement The Project Team will continue coordination with affected residents, business owners, communities, property owners and travelers on the proposed Project. A Public Involvement Plan to provide Project information, updates and construction information to community businesses, traveling public and residents will be developed and maintained throughout Project development. The plan will address the Project through design, construction and operations.	TDOT/Developer	Negligible	Incomplete <hr/> Signature Required

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	PRE-, DURING, OR POST CONSTRUCTION	COMMITMENT	RESPONSIBLE PARTY	EST. COST	STATUS
A-35	Pre-construction	<p>Floodplains Complete Hydraulic Analysis for final design; acquire No-Rise Certifications for the protection of floodplains. Coordination with the locals to acquire a CLOMR/LOMR will be required if a No-Rise Certification cannot be obtained. Modifications to the design will be considered during final design to reduce impacts to floodplains and be incorporated into final design where practicable.</p>	Developer	Negligible	Incomplete <hr/> Signature Required
A-36	Pre-construction, During Construction,	<p>Restricted Access Areas The Developer should attempt to avoid impacts to the extent practicable, including any construction related activities in the following areas: Historic properties on or listed for the National Register of Historic Places, parks and greenways. If impacts are unavoidable, the Developer shall coordinate with TDOT Environmental Division prior to construction activities.</p>	Developer	Negligible	Incomplete <hr/> Signature Required

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<i>Total Estimated Cost</i>	TBD
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B. Special Provisions (Attach all special provisions with transmittal letters to the commitments table, if available)

	SPECIAL PROVISION	PURPOSE	EST. COST	LATEST DATE
B-1	SP107CS	For the protection of Cliff swallows and Barn swallows.	Negligible	2/13/2012

C. Necessary Permits, Buffer Variances and Mitigation Credits

	PERMIT	ADD'L INFO (PERMIT EXPIRATION DATE, NUMBER OF CREDITS NEEDED, ETC.)	EST. COST	ACQUIRED?
C-1	Nationwide Permit	TDOT would apply for a Nationwide Permit under Section 404 of the CWA through the USACE Nashville District. As part of the Section 404 permit, compensatory mitigation credits will be required where avoidance and minimization of impacts is not achievable. Compensatory mitigation would be used to offset unavoidable impacts to wetlands and WOTUS. TDOT is in the process of seeking proposals for full delivery stream mitigation for the Interstate 24 Southeast Choice Lanes project.	Negligible	Will be acquired following Let
C-2	Section 401	Permitting of unavoidable impacts to water quality would occur through Section 401 of the CWA and through TDEC's ARAP program.	Negligible	Will be acquired following Let
C-3	Notice of Intent (NOI) for NPDES	Developer will submit an NOI for the NPDES General Permit following award of the contract but prior to construction activities.	Negligible	Will be acquired following Let

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6. RECOMMENDATIONS AND CONCLUSION

This chapter presents the recommendations and conclusions derived from this comprehensive EA. The analysis has identified critical areas where strategic actions can significantly mitigate environmental impacts. These recommendations are designed to guide decision-makers, stakeholders and Project implementers in adopting best practices and ensuring the long-term success of the proposed Project.

In summary, the EA outlines the purpose and need and alternatives analysis and provides an evaluation of potential impacts to the social, cultural, natural and physical environment that would result from the proposed undertaking of the I-24 Southeast Choice Lanes project. Impacts were outlined to describe the potential environmental consequences of the Build Alternative (Alternative 1A) as compared with those of the No-Build Alternative. The analysis of alternatives for the proposed Project determined that improvements to I-24 under the Build Alternative, which TDOT is recommending as the recommended Preferred Alternative would meet the Purpose and Need established for the proposed Project. The proposed Project would increase capacity and improve travel times along I-24 between I-40 south of downtown Nashville and I-840 near Murfreesboro. The technical studies conducted to evaluate impacts to the social, cultural, natural and physical environments indicate that the recommended Preferred Alternative would result in no significant impacts that would warrant an Environmental Impact Statement (EIS).

Based on the analysis, this EA is recommended to advance to a public hearing. Once the EA has been signed by FHWA and approved for public dissemination, a Notice of Availability (NOA) will be distributed, and public hearings will be held. Per 23 CFR 771.119,⁹⁰ the approved EA must be available to the public for a minimum of 15 days before the public hearing. The EA will also be published on the Project website.

After a review of comments received from the public, if no significant impacts are identified, a FONSI would be prepared by TDOT and submitted to the FHWA. Approval of the FONSI by the FHWA would identify the Selected Alternative and conclude the NEPA process.

⁹⁰ [23 CFR 771.119](#). Accessed October 2025.

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APPENDIX B. NEED AND PURPOSE STATEMENT MEMORANDUM

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APPENDIX C. EXISTING CONDITIONS REPORT

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APPENDIX D. TRAFFIC ANALYSIS REPORT

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APPENDIX E. DESIGN REPORT: PRELIMINARY GEOMETRIC SCREENING

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APPENDIX F. SOCIOECONOMICS CONDITIONS TECHNICAL MEMORANDUM

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APPENDIX G. LAND USE AND COMMUNITY FACILITIES TECHNICAL MEMORANDUM

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APPENDIX H. SECTION 4(F)/SECTION 6(F) MEMORANDUM

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APPENDIX I. VISUAL IMPACTS ASSESSMENT APPROACH MEMORANDUM

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APPENDIX J. VISUAL IMPACTS ASSESSMENT

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APPENDIX K. CONCEPTUAL STAGE RELOCATION PLAN

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APPENDIX L. AIR QUALITY TECHNICAL REPORT

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APPENDIX M. NOISE TECHNICAL REPORT

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APPENDIX N. ECOLOGICAL REPORTS

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APPENDIX O. FLOODPLAINS MANAGEMENT TECHNICAL REPORT

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APPENDIX P. BIOLOGICAL ASSESSMENT REPORT

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APPENDIX Q. PHASE 1 ENVIRONMENTAL SITE ASSESSMENT & ADDENDA

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APPENDIX R. HISTORIC RESOURCES SURVEY AND DETERMINATION OF ELIGIBILITY & ADDENDA I & II

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APPENDIX S. PHASE I ARCHAEOLOGICAL ASSESSMENT & ADDENDA I & II

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APPENDIX T. CULTURAL RESOURCES ASSESSMENT OF EFFECTS & ADDENDUM I

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APPENDIX U. CONCURRENCE POINT PACKAGES

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APPENDIX V. PUBLIC INVOLVEMENT PLAN (PIACP)

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APPENDIX W. PIM COMMENT SURVEY

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APPENDIX X. AGENCY AND STAKEHOLDER MEETING SUMMARIES

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