

On January 20, 2025, President Trump signed Executive Order (E.O.) 14148 --Initial Rescissions of Harmful Executive Orders and Actions and E.O. 14154 – Unleashing American Energy. The E.O.s revoked E.O. 13990 – Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (January 20, 2021) and E.O. 14008 – Tackling the Climate Crisis at Home and Abroad (January 27, 2021). Subsequently on January 29, 2025, Secretary Duffy signed a Memorandum for Secretarial Offices and Heads of Operating Administrations – Implementation of Executive Orders Addressing Energy, Climate Change, Diversity, and Gender. On February 25, 2025, the Council on Environmental Quality (CEQ) published an Interim Final Rule removing the CEQ’s National Environmental Policy Act (NEPA) implementing regulations, effective April 11, 2025 (90 Fed. Reg. 10610). As a result of these actions, FHWA will not include greenhouse gas emissions and climate change analyses in the federal environmental review process. Any purported greenhouse gas emissions and climate change impacts were not considered in the federal decision. Accordingly, no greenhouse gas emissions or climate change analyses are included in this FONSI.

Also on January 20, 2025, President Trump signed Executive Order (E.O.) 14148 --Initial Rescissions of Harmful Executive Orders and Actions and E.O. 14154 – Unleashing American Energy. The E.O.s revoked E.O. 14096 – Revitalizing Our Nation’s Commitment to Environmental Justice for All (April 21, 2023). Subsequently on January 21, 2025, President Trump signed E.O. 14173 – Ending Illegal Discrimination and Restoring Merit-Based Opportunity. This E.O. revoked E.O. 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994). On February 25, 2025, the Council on Environmental Quality (CEQ) published an Interim Final Rule removing the CEQ’s National Environmental Policy Act (NEPA) implementing regulations, effective April 11, 2025 (90 Fed. Reg. 10610).

As a result of these actions, all federal environmental justice requirements are revoked and no longer apply to the federal environmental review process. FHWA, FTA and FRA’s Joint NEPA regulations (23 CFR part 771) and the agencies Interim Final Guidance on “Section 139 Environmental Review Process: Efficient Environmental Reviews for Project Decision-making and One Federal Decision” (12/17/2024) do not require an environmental justice analysis. Accordingly, no analysis of environmental justice is included in this FONSI. Any purported environmental justice impacts were not considered in the federal decision. Social, economic, and community impacts will continue to be disclosed where applicable in accordance with 23 CFR 771.

As a result of E.O. 14148, E.O. 14154, E.O. 14173, and the removal of the Council on Environmental Quality’s regulations, all federal environmental justice requirements are revoked and no longer applicable to the federal environmental review process. Accordingly, this FONSI does not consider public comments regarding environmental justice.

**Tennessee Environmental Streamlining Agreement Concurrence Form  
Concurrence Point 1  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

The Tennessee Department of Transportation (TDOT) is preparing an Environmental Assessment for Interstate 24 (I-24) improvements from the Interchange of I-24 and I-40 in Davidson County to the Interchange of I-24 and I-840 in Rutherford County, Tennessee. This Environmental Assessment is being developed by TDOT to document the impacts of the subject project, in accordance with the *National Environmental Policy Act* (NEPA) and the *Tennessee Environmental Streamlining Agreement* (TESA). In accordance with TESA, we are requesting your review and concurrence on *Concurrence Point 1, Project Study Area and Project Purpose and Need*.

The Concurrence Point 1 package is sent to you this day, June 26, 2024 for a 30-day review period. Once you have had the opportunity to review the above referenced document, please sign this form. In signing this document, you are indicating your concurrence on the Proposed Project Study Area and Purpose and Need to be used in the Environmental Assessment. If a response is not received by the date outlined below, TDOT will assume concurrence by all participating agencies that have not responded. Due to the project schedule and extensive agency coordination being conducted, extensions for review timelines under the TESA agreement will not be considered for this project.

**Please sign and return this form to Dr. Tammy Sellers at the address below by Tuesday, July 25, 2024.**

Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA Concurrence Point 1 have been satisfied, please acknowledge concurrence with the adequacy of the Project Study Area and Purpose and Need package.

AGENCY: \_\_\_\_\_

CONCURRENCE: \_\_\_\_\_

DATE: \_\_\_\_\_

The Agency Concurrence Packages may contain language or data on Environmental Justice populations or communities and was published prior to Executive Order: Unleashing American Energy, dated January 20, 2025 and/or Executive Order: Ending Illegal Discrimination and Restoring Merit-Based Opportunity, dated January 21, 2025.



**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION**

**ENVIRONMENTAL DIVISION**  
SUITE 900, JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1402  
(615) 741-3655

**BUTCH ELEY**  
DEPUTY GOVERNOR &  
COMMISSIONER OF TRANSPORTATION

**BILL LEE**  
GOVERNOR

**To:** John Griffith, U.S. Department of the Interior, U.S. Fish and Wildlife Service  
Anne Patrick, Tennessee Valley Authority  
US Coast Guard

**From:** Tammy Sellers, Section Manager, Tennessee Department of Transportation,  
Environmental Division, Environmental Quality & NEPA Section

**Date:** June 26, 2024

**Subject:** Coordination Request for Interstate 24 Southeast Choice Lanes Project, Davidson  
and Rutherford Counties, Tennessee, Project # 134727.01

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA), has initiated early agency coordination on an Environmental Assessment (EA) for the construction of a new Choice Lanes facility along Interstate 24 (I-24) from the interchange of I-24 and I-40 in Davidson County to the interchange of I-24 and I-840 in Rutherford County. This EA will be developed in accordance with the National Environmental Policy Act (NEPA) and the Tennessee Environmental Streamlining Agreement (TESA). The proposed project will include mainline interstate widening to accommodate new Choice Lanes and proposed interchange modifications along I-24 to accommodate the widening and access to the Choice Lanes. The proposed project will also evaluate introducing new dedicated Choice-Lanes-only direct access interchanges at several existing overpasses on I-24 and potentially one on I-40 within the extent of the modifications necessary for the I-24 at I-40 interchange. The attached project location map outlines the proposed project study area.

The needs of the proposed project have been identified as travel time conditions, supporting ongoing growth in the region, existing operational and safety deficiencies, and insufficient connectivity to Downtown Nashville and the surrounding area.

Your agency has been identified as an agency that may have an interest in the proposed project. With this letter, TDOT is extending your agency an invitation to become a **Participating Agency** (in accordance with Section 6002 of the *Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU)) with TDOT and FHWA in the development of the EA for this proposed project. This designation does not imply that your agency either supports the proposal or has any special expertise with respect to evaluation of the proposed project.

Your agency is also a signatory to the Tennessee Environmental Streamlining Agreement (TESA), an inter-agency agreement that incorporates and builds upon the requirements of Section 6002 of the SAFETEA-LU relevant to the development of EA and Environmental Impact

Statement (EIS) “classes of action” as defined in the FHWA’s NEPA regulations (23 CFR 771.115).

As outlined in the TESA, TDOT and the FHWA, in consultation with other signatory agencies, retain the ability to decide whether a project does not warrant involvement in the TESA process due to minimal adverse impacts.

TDOT and the FHWA have determined that the proposed I-24 Southeast Choice Lanes Project does warrant involvement in the TESA process, and a project-specific Project Coordination Plan is being developed due to the project schedule. Development of the EA will include coordination and outreach in accordance with FHWA NEPA regulatory requirements and the TESA process, the TESA Project Coordination Plan defines your agency’s role in the development of the proposed project. Due to the project schedule and extensive agency coordination being conducted, extensions for review timelines under the TESA agreement will not be considered for this project.

Pursuant to Section 6002 of the SAFETEA-LU, Participating Agencies are responsible for assisting in the identification of, as early as practicable, any issues of concern regarding the proposed project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the proposed project.

We suggest that your agency’s role in the development of the project should include the following activities as they relate to your area of expertise:

- 1) Providing meaningful and early input on the project’s purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in alternatives analysis.
- 2) Identifying any issues of concern regarding the project’s potential environmental and/or socioeconomic impacts.

Please respond in writing via letter or email with an acceptance or denial of this invitation by **7/25/2024**. If your agency chooses not to be designated as a Participating Agency for this proposed project, your response should state your reason for declining the invitation. Pursuant to Section 6002 of SAFETEA-LU, any federal agency that chooses to decline the invitation must specifically state that your agency:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; or
- Does not intend to submit comments on the project.

If a response is not received by the date outlined below, TDOT will assume concurrence by all participating agencies that have not responded.

TDOT conducted an Agency Scoping Meeting for the proposed I-24 Southeast Choice Lanes Project on 04/23/2024. Your agency was provided with the Draft Project Coordination Plan, the proposed Project Purpose and Need Statement, and an overview of the project study area at this meeting. By email correspondence on 04/29/2024, TDOT requested that you review the enclosed materials and provide comments on potential environmental impacts and the Project Coordination Plan and Public Involvement Plan by 05/28/2024. All the comments received have been incorporated in the Project Coordination Plan attached to this letter.

If you have any questions or would like to discuss in more detail the project or your agency’s roles and responsibilities during the preparation of this EA, please contact me at 615.741.5367 or [Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov).

Once the EA has been approved, a Notice of Availability (NOA) will be distributed to your agency via email. The NOA will include a link to a digital copy of the EA unless otherwise requested.

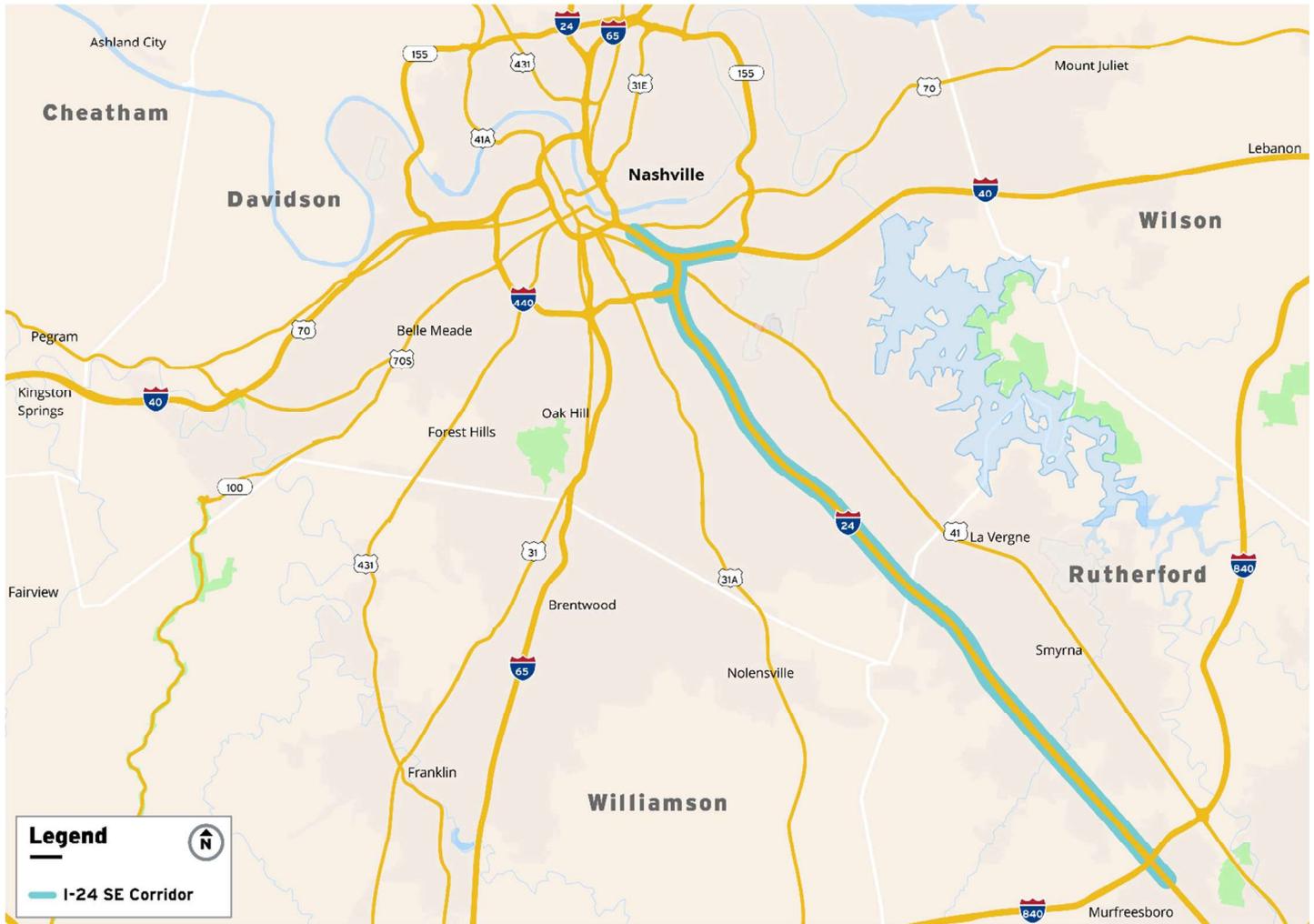
Thank you for your cooperation and interest in this project.

*Attachments:*

Project Location Map

Project Coordination Plan

# Project Location Map:



## I-24 Southeast Corridor





**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION**

**ENVIRONMENTAL DIVISION**  
SUITE 900, JAMES K. POLK BUILDING  
505 DEADERICK STREET  
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(615) 741-3655

**BUTCH ELEY**  
DEPUTY GOVERNOR &  
COMMISSIONER OF TRANSPORTATION

**BILL LEE**  
GOVERNOR

**To:** U.S. Department of Agriculture, Natural Resources Conservation Service  
Ntale Kajumba, U.S. Environmental Protection Agency, NEPA Programs Office

**From:** Tammy Sellers, Section Manager, Tennessee Department of Transportation,  
Environmental Division, Environmental Quality & NEPA Section

**Date:** June 26, 2024

**Subject:** Coordination Request for Interstate 24 Southeast Choice Lanes Project, Davidson  
and Rutherford Counties, Tennessee, Project # 134727.01

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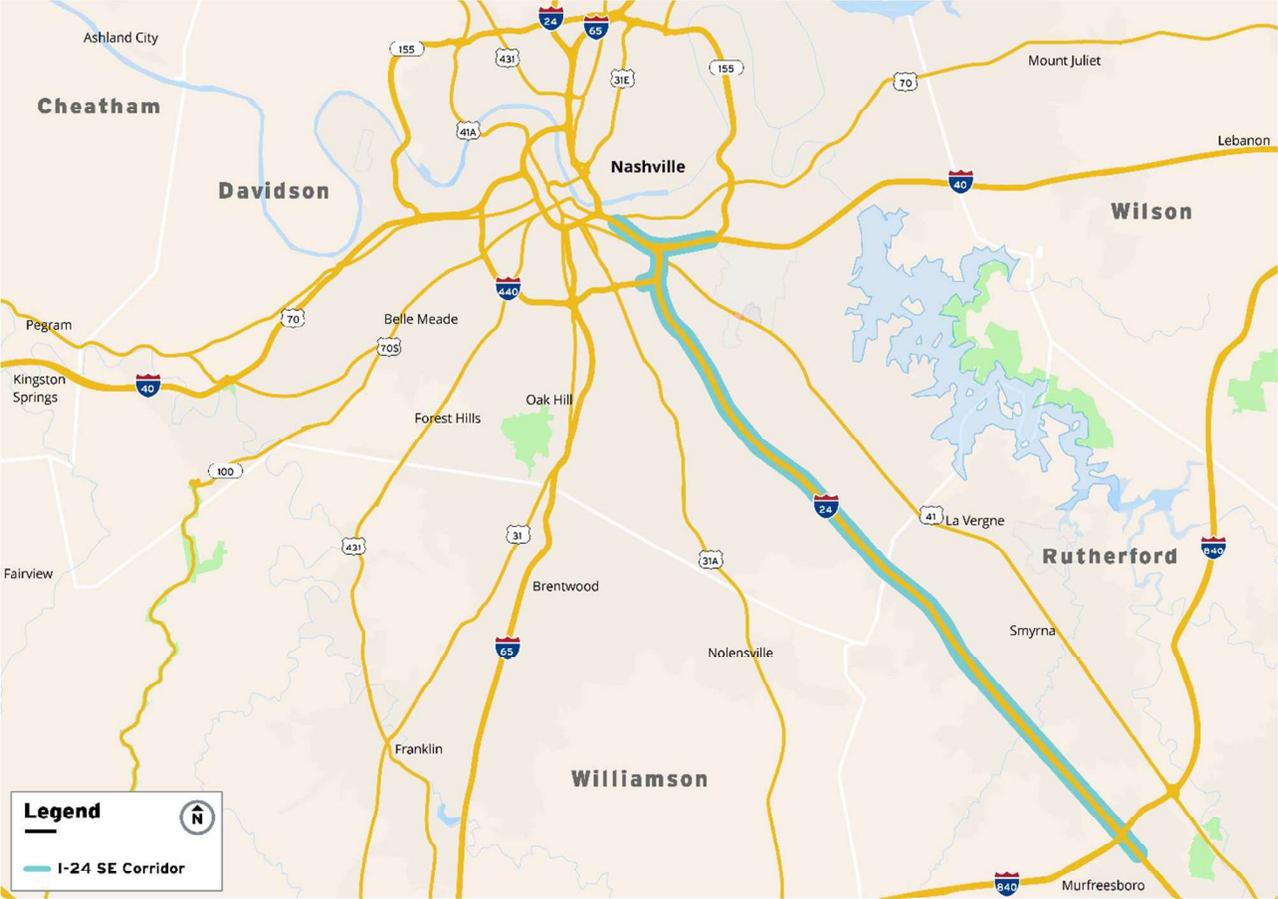
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**Project Location Map:**



**I-24 Southeast Corridor**





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**BILL LEE**  
GOVERNOR

**To:** Jason Miller, Tennessee Wildlife Resources Agency  
Casey Parker, Tennessee Wildlife Resources Agency  
Holly Barnett, Tennessee State Historic Preservation Office  
Patrick McIntyre, Tennessee State Historic Preservation Office  
Tennessee Department of Environment and Conservation, Division of Natural Areas

**From:** Tammy Sellers, Section Manager, Tennessee Department of Transportation, Environmental Division, Environmental Quality & NEPA Section

**Date:** June 26, 2024

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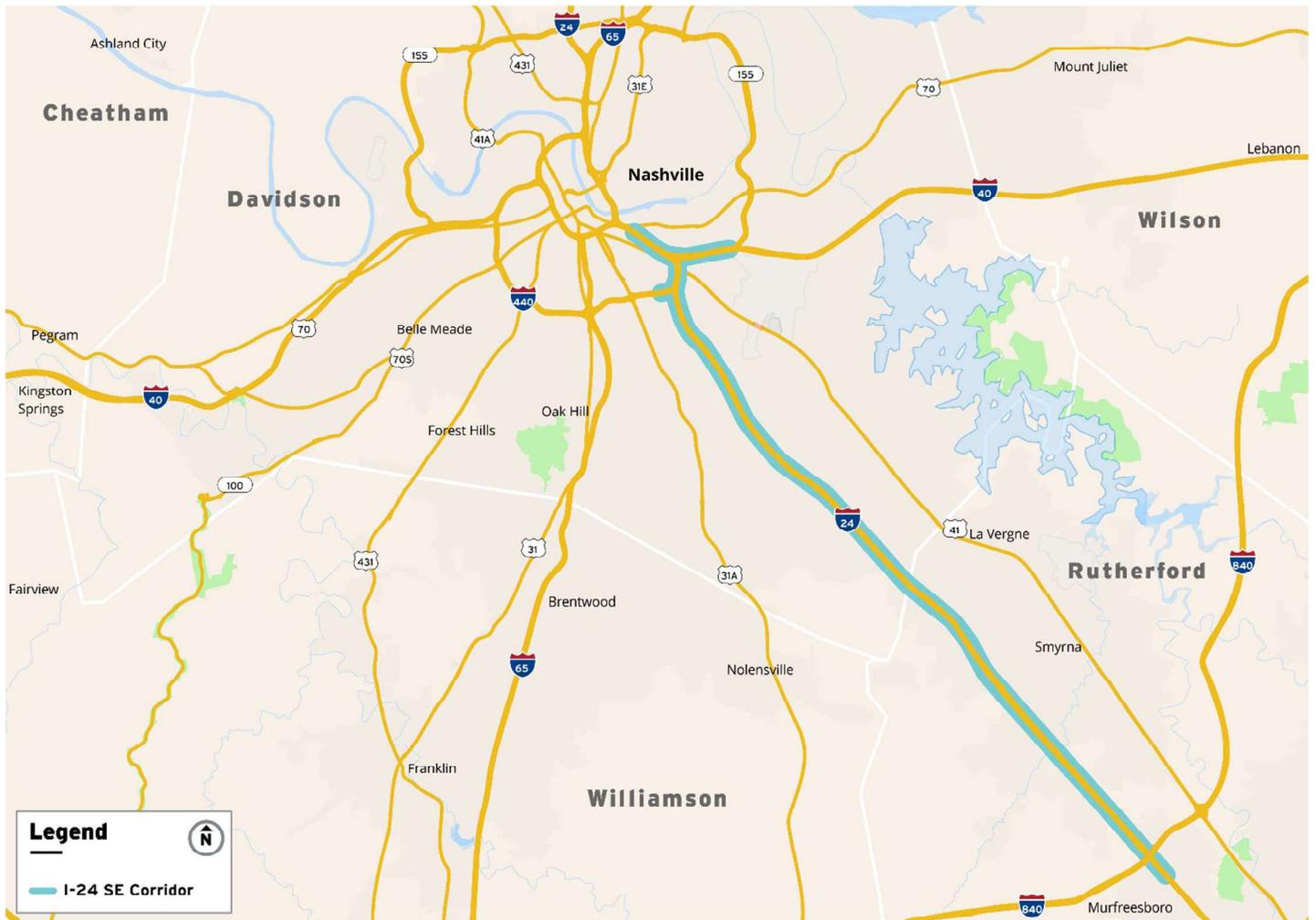
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Project Location Map

Project Coordination Plan

## Project Location Map:



## I-24 Southeast Corridor



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# TESA CONCURRENCE POINT 1:

## PURPOSE AND NEED AND STUDY AREA PACKAGE

I-24 SOUTHEAST CHOICE LANES

June 2024





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## 1. INTRODUCTION

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA) is proposing the construction of a new Choice Lanes facility along Interstate 24 (I-24) from the interchange of I-24 and I-40 in Davidson County to the interchange of I-24 and I-840 in Rutherford County. Since the proposed project is on the interstate system, TDOT and FHWA are preparing an Environmental Assessment (EA) to identify and evaluate the environmental effects of the proposed project and to identify measures to minimize harm.

This document serves as the Purpose and Need and Study Area Package required for Concurrence Point 1 under the Tennessee Environmental Streamlining Agreement (TESA) for the Environmental and Regulatory Coordination of Major Transportation Projects.

This Purpose and Need and Study Area Package is being distributed to the TESA participating agencies listed below:

- U.S. Army Corps of Engineers, Nashville District (USACE-Nashville)
- Tennessee Valley Authority (TVA)
- U.S. Fish and Wildlife Service (USFWS)
- Environmental Protection Agency, Region 4 (EPA)
- Tennessee Department of Environment and Conservation (TDEC)
- Tennessee Wildlife Resources Agency (TWRA)
- State Historic Preservation Office (Tennessee SHPO)

As Concurrence Point 1, the FHWA (the lead federal agency) and TDOT (the lead state agency) are requesting formal concurrence on the proposed project's purpose and need and the study area prior to the development of alternatives.



# PROJECT OVERVIEW

## Transportation Modernization Act

In early 2023, Governor Bill Lee signed the Transportation Modernization Act (TMA) into law 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 TMA allows TDOT to expand its alternative project delivery methods, including the utilization of **Public-Private Partnerships (P3s)** and Choice Lanes

**Public-Private Partnerships (P3s)** are partnerships formed between public entities like TDOT and private companies, allowing Tennessee to better allocate the limited resources for transportation projects by leveraging private-sector innovation and capital. Private-sector partners would design, build, finance, operate and maintain Choice Lanes projects. P3s allow for shared risks, accelerated project delivery, provide access to additional capital, enable a longer-term view of asset management, and can reduce public cost. Any debt from Choice Lanes projects could be privately financed without obligations to the state.

to deliver its urban congestion reduction improvement projects.

Choice Lanes are priced managed lanes that use pricing to proactively manage demand and provide travel-time reliability. Choice Lanes allow motorists to maintain consistent travel speeds even when the adjacent existing lanes are congested. Choice Lanes are new lanes and typically operate at around 45 miles per hour (mph) during rush hours.

The additional state funding provided through the TMA expands TDOT's federal dollar capabilities and accelerates urban congestion projects, including Choice Lanes. TDOT's [10-Year Project Plan](#) identified the Interstate 24 (I-24) corridor

southeast of Nashville between I-40 and I-840 as a priority urban congestion relief project to deliver as Tennessee's first Choice Lanes project. The proposed Choice Lanes on I-24 Southeast are part of a larger program of proposed Choice Lanes projects in some of the most congested areas of Tennessee.

## Project Overview

The purpose of the proposed I-24 Southeast Choice Lanes project is to improve travel time reliability and regional connectivity issues along approximately 24 miles of I-24 between I-40 near Downtown Nashville and I-840 near Murfreesboro. The proposed project would address unreliable trip times for commuters, including passenger vehicles or transit, and regional connectivity issues. Specifically, considering financial constraints, the project seeks to leverage funding and financing mechanisms provided by the TMA. The proposed project

not only bolsters connectivity between Nashville and Murfreesboro but also amplifies access to employment areas, healthcare services, educational facilities and a spectrum of regional resources that extend beyond the proposed project corridor. The proposed Choice Lanes would involve a contract with a private-sector partner to design, build, finance, operate and maintain the new, optional lanes through a P3. The project study area includes 26 miles of interstate segments:

- I-40, from Browns Creek to Briley Parkway
- I-24, from I-40 to I-840 (south of Downtown Nashville)

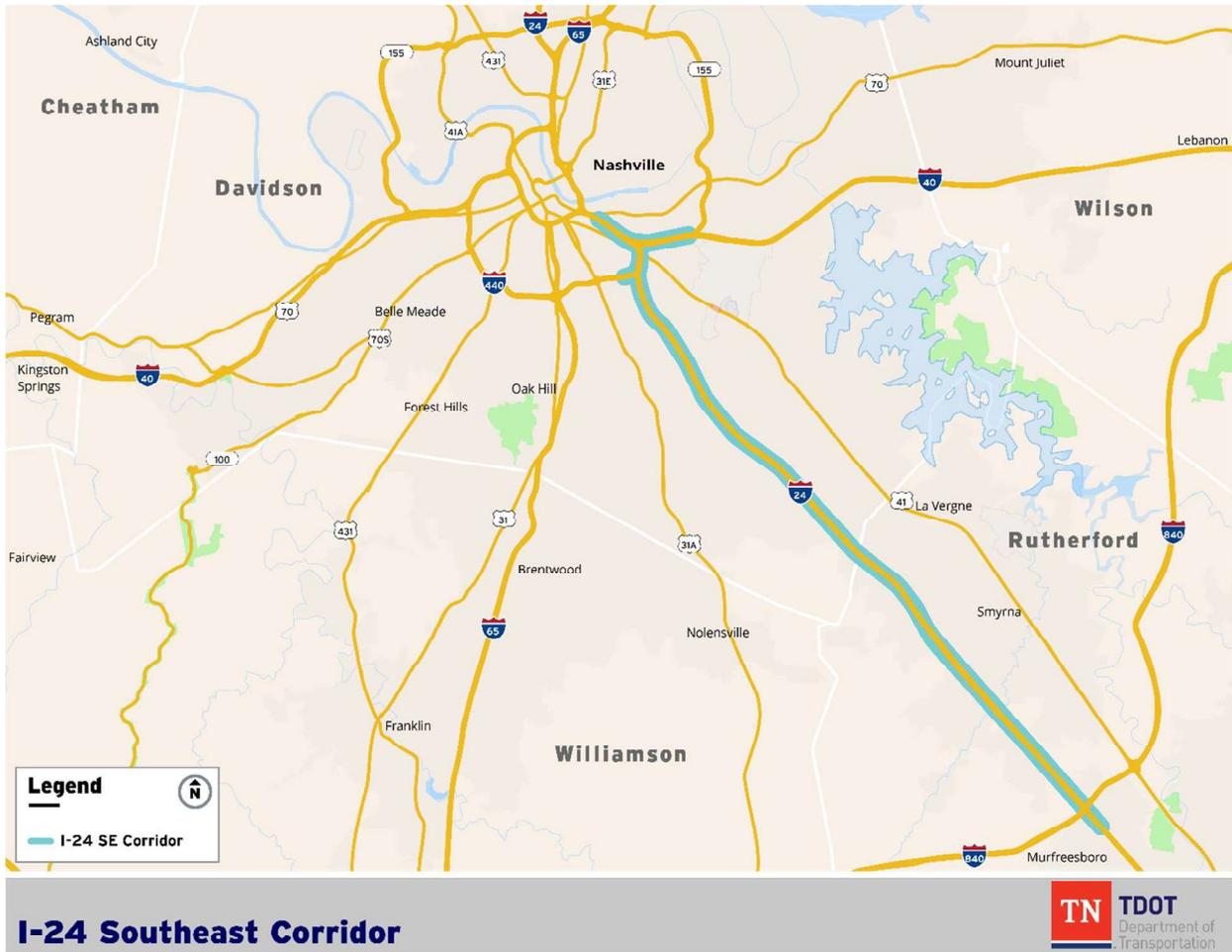
TDOT is advancing the proposed I-24 Southeast Choice Lanes project by initiating surveys and field studies as part of the National Environmental Policy Act (NEPA) development process.

The initial planning will include the development and screening of a preliminary range of multimodal alternatives, which will be refined to reach a set of Reasonable Alternatives. The Reasonable Alternatives for the I-24 Southeast corridor will be advanced through the NEPA process.

The following project location map provides a visual overview of the proposed I-24 Southeast Choice Lanes project identified in the TDOT 10-Year Project Plan published on December 18, 2023, which has committed funding.



**Figure 1: Project Location Map**



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## DEFINITION OF STUDY AREA

### Environmental Technical Study Area (ETSA)

The Environmental Technical Study Area (ETSA) is a standard area identified during early planning is used for the identification of environmental resources. The ETSA varies depending on the type of road being improved.

The final study area complies with the TDOT Environmental Technical Study Areas (ETSA) Guidance. An ETSA is developed for a project to document natural, cultural and community resources within a broader study area than the immediate project footprint. By documenting all resources within this broader area TDOT staff can better plan for and potentially mitigate any impacts to these resources as projects progress. The ETSA

Guidance for interstate widening projects requires the boundary be set a minimum of 50 feet past the proposed Right-of-Way (ROW) line, or proposed slope lines, whichever is greater.

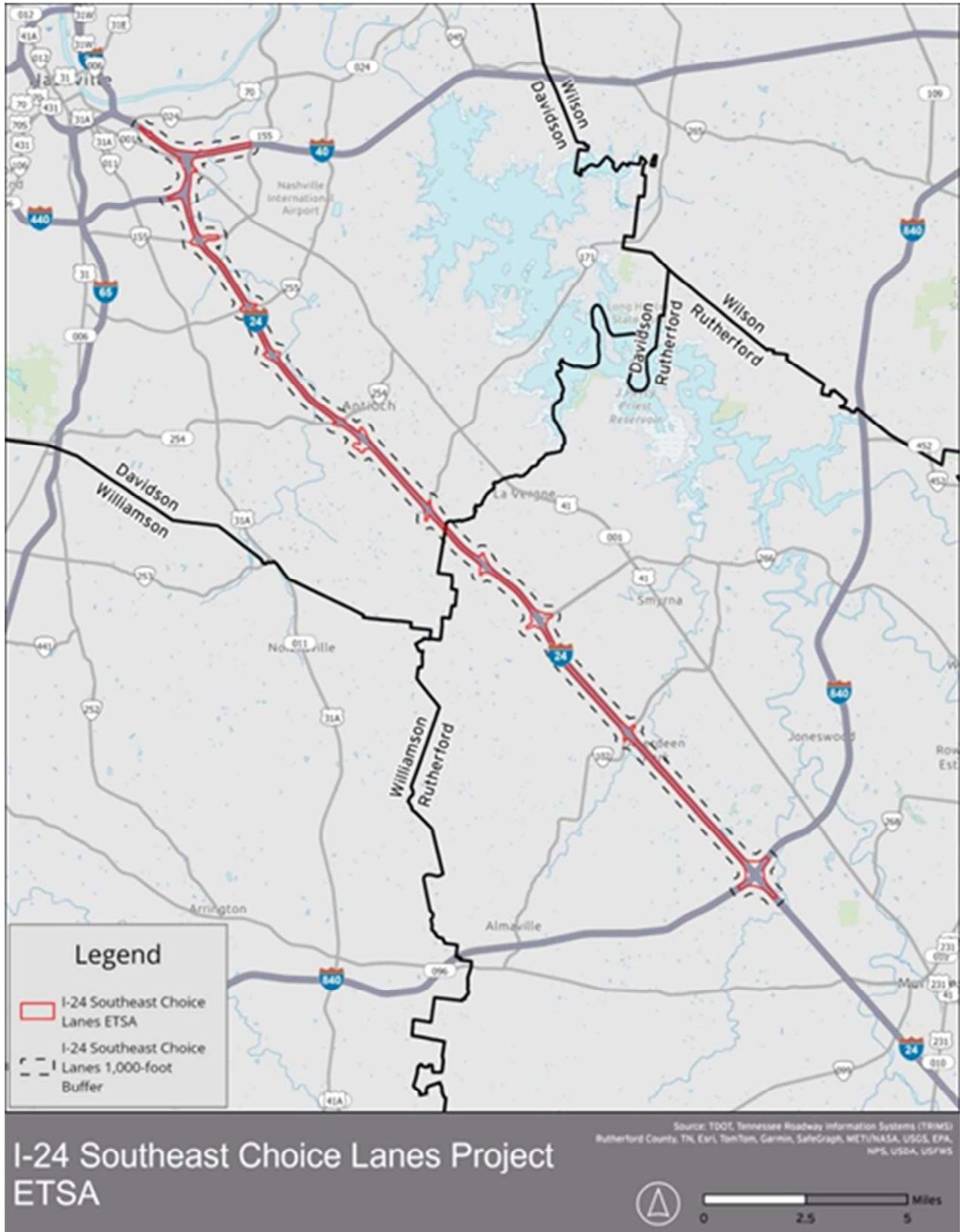
## **I-24 Southeast Choice Lanes ETSA**

The I-24 Southeast Corridor include roadways, interchanges, and right-of-way along an approximately 26-mile stretch of I-24 from I-40 to I-840 in Davidson & Rutherford Counties.

- ETSA was established using TDOT guidance and input.
- ETSA extends at least 300 feet beyond project limits, 150 feet beyond tie in points for interchanges and ramps, and 100 feet beyond existing right-of-way (ROW).
- Resources that require visual impacts to be considered were identified beyond the ETSA, as is typical for all TDOT projects.
- 1000-ft buffer was applied to the ETSA for certain resources that could potentially experience indirect impacts:
- Environmental Justice, Populations & Employment, Land Use, Community Facilities, Parks & Recreation
- Buffers were applied to all resources for desktop available data to inform early planning.



Figure 2: Project ETSA



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## PROJECT PURPOSE AND NEED

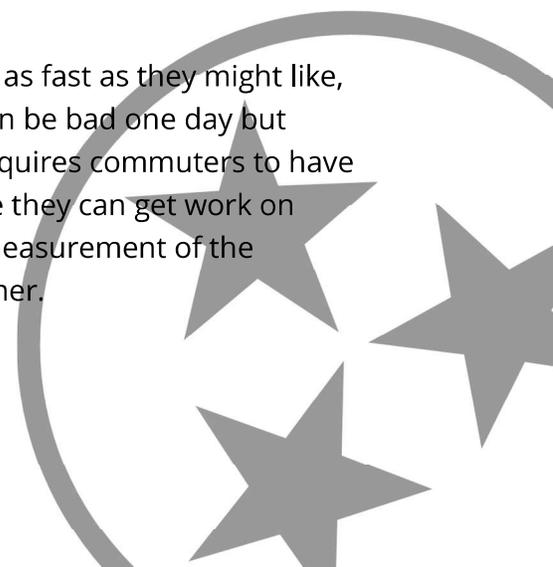
The purpose of the proposed project is to improve travel time reliability and regional connectivity issues along approximately 26-miles of I-24 between I-40 south of downtown Nashville and I-840 near Murfreesboro. The proposed project would address unreliable trip time for commuters, including those commuting via passenger vehicles or transit, and regional connectivity issues. Specifically, considering financial constraints, the project seeks to leverage the user fee financing mechanisms provided in the Transportation Modernization Act (TMA).

### Project Need

Commuters, including those commuting via passenger vehicles or transit, on I-24 between I-40 south of downtown Nashville and I-840 near Murfreesboro experience unreliable trip times and regional connectivity issues.

The I-24 Southeast corridor is located southeast of the Nashville downtown and serves about 174,000 vehicles per day with highest volumes just south of Briley Parkway, and about 13.5 percent (23,390) of vehicles are heavy vehicles. On average, vehicles travel at approximately 32 mph during morning and evening peak hours with slowest speeds occurring near where I-40, I-24, and I-440 merge in the morning where vehicles travel at about 10 mph. In the evening, slowest traffic occurs at the I-440 at I-24 interchange where vehicles travel at about 9 mph. Based on data from 2017 through 2020, travel speeds in the morning have deteriorated by 4 percent with largest deterioration seen for westbound traffic just south of I-24 at I-440 interchange. Travel speeds at the location just south of the I24 at I-440 interchange decreased by 46 percent. Travel speeds in the evening have deteriorated by 8 percent on average. The largest deterioration in travel speed has occurred between the I-40/I-24/I-440 merge and the Inner Loop where speeds have decreased by 42 percent. Nearly 3,800 bottlenecks occurred on the I-24 Southeast corridor in a 5-month span. The most significant of these occur just south of the Inner Loop. On average, bottlenecks occur multiple times a day, affect about 6.3 miles of roadway and take about 52 minutes to clear.

Beyond the fact that congestion restricts travelers from traveling as fast as they might like, another major way that it detracts from quality of life is how it can be bad one day but much worse the next. This lack of travel time reliability usually requires commuters to have to plan to leave home earlier than they normally would to ensure they can get work on time if traffic is worse than normal. Travel time reliability is the measurement of the consistency or dependability of travel time from one day to another.



# ALTERNATIVE SCREENING CRITERIA FOR MEETING PURPOSE AND NEED

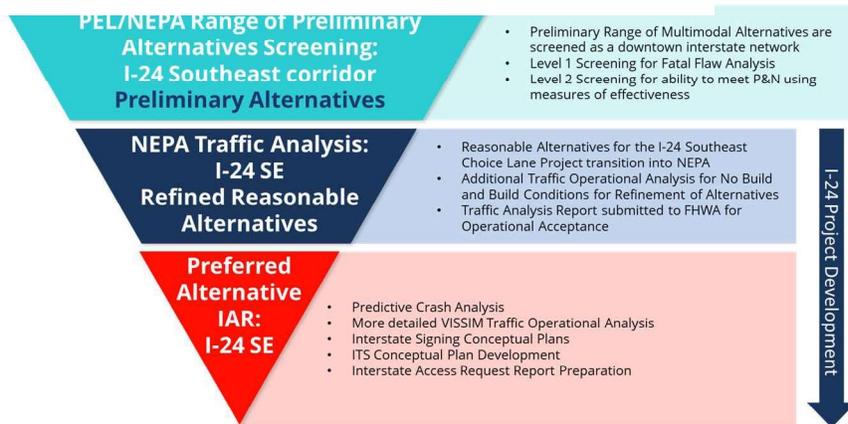
## Preliminary Alternatives Development & Screening

The preliminary alternatives development and screening will consist of three levels, starting at a Level 1 fatal flaw screening, followed by a Level 2 Refined Alternatives screening, and proceeding to a Level 3 Reasonable Alternatives screening. The Level 1 fatal flaw evaluation will start with up to 25 multimodal alternatives and will be a qualitative analysis. The Project Team will compile the Level 1 fatal flaw evaluation into a Level 1 screening matrix with supporting information documenting the decisions made. The alternatives moving forward will be the Refined Alternatives.

In the Level 2 Refined Alternatives screening, the Project Team will use the results of the Level 1 fatal flaw evaluation to further develop Refined Alternatives that satisfy the Purpose and Need. The analysis of the Refined Alternatives will be both qualitative and quantitative based on the availability of data. The Level 2 screening will evaluate traffic and safety, engineering, environmental, community, planning-level cost estimates and agency/public input for the Refined Alternatives. The Project Team will compile the Refined Alternatives into a Level 2 screening matrix with supporting information documenting the decisions made. The alternatives moving forward will be the Reasonable Alternatives.

Once a set of Recommended Reasonable Alternatives is identified in the screening process, the I-24 Southeast corridor Reasonable Alternatives will be advanced to the NEPA project development process in a parallel process. This screening effort is depicted below.

**Figure 3: Alternatives Development Process**



*This figure depicts the process through which the preliminary range of multimodal alternatives are screened through this initial Planning Study to a set of Reasonable Alternatives which are further screened through traffic analysis during the NEPA alternatives analysis to a recommended Preferred Alternative which is analyzed through traffic design and presented in the Interstate Access Report to FHWA for final approval to advance forward to final design and construction.*

**Tennessee Environmental Streamlining Agreement  
Concurrence Point 2 Concurrence Form  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

The Tennessee Department of Transportation (TDOT) is preparing an Environmental Assessment (EA) for the I-24 Southeast Choice Lanes Project in Davidson and Rutherford Counties. This EA is being developed by TDOT to document the impacts of the subject project in accordance with the *National Environmental Policy Act (NEPA)* and the *Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects (TESA)*. In accordance with TESA, we are requesting your review and concurrence on Concurrence Point 2 (CP2), *Alternatives to be Evaluated in the Environmental Document*.

The *Alternatives to be Evaluated in the Environmental Document* was sent to you on August 28, 2024, for a 30-day review period. Once you have had the opportunity to review the document, please sign this form. In signing this document, you are indicating your concurrence on the alternatives to be evaluated in the EA. If a response is not received by the date outlined below, TDOT will assume concurrence by all participating agencies that have not responded. Due to the project schedule and extensive agency coordination being conducted, extensions for review timelines under the TESA agreement will not be considered for this project.

Please sign and return this form to Dr. Tammy Sellers at the address below by **September 27, 2024**.

Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA CP2 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA AGENCY: \_\_\_\_\_

TESA CONTACT: \_\_\_\_\_

Print Name

Title

CONCUR: \_\_\_\_\_

Signature

Date



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Tennessee Ecological Services Field Office  
446 Neal Street  
Cookeville, Tennessee 38501  
(931) 528-6481



September 26, 2024

Dr. Tammy Sellers  
TDOT Environmental Division  
NEPA Special Projects Office Environmental Technical Office  
505 Deaderick Street, Suite 900  
James K Polk Building  
Nashville, Tennessee 37243

Subject: FWS# 2024-0109689. Concurrence Point 2. Proposed Interstate 24 Southeast Choice Lanes; PIN 101422.00, P.E. Number: 15005-1234-04, Davidson and Rutherford counties, Tennessee.

Dear Dr. Sellers:

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration, is initiating National Environmental Policy Act (NEPA) documentation and analysis for the proposed construction of a new Choice Lanes facility along Interstate (I-) 24 from the interchange of I-24 and I-40 in Davidson County to the interchange of I-24 and I-840 in Rutherford County, Tennessee. The purpose of this project is to improve travel time conditions, support ongoing growth in the region, and address existing operational and safety deficiencies and insufficient connectivity to Downtown Nashville and the surrounding area.

The Project Alternatives to be Evaluated in the Environmental Document was developed by TDOT to justify this project in accordance with NEPA and the Tennessee Environmental Streamlining Agreement (TESA). In accordance with TESA, TDOT has requested that the U.S. Fish and Wildlife Service review and provide concurrence (or nonconcurrence) on Concurrence Point 2, Project Alternatives to be Evaluated in the Environmental Document.

The Project Alternatives analysis determined that both build alternatives (Alternative 1 and Alternative 2) are viable and will be carried forward for further consideration in the development of the environmental document. Although they share design elements and either would be constructed along existing alignment, there does appear to be significant differences when comparing the alternatives. Alternative 1 would require roughly 40 percent less right-of-way acquisition, have up to 40 percent fewer impacts to streams, and result in less impact to wetlands than Alternative 2 (4.4 acres of impact estimated for Alternative 1 versus 6.7 acres for

Alternative 2). Because our species of concern consist of rare plants that occur in limestone outcrops and glade habitat as well as aquatic species within the Mill Creek drainage and the Stones River watershed, the presence of these habitats within the project area increases the likelihood for impacts with Alternative 2. In addition to potentially fewer impacts to the natural environment with Alternative 1, there appears to be a significantly lower impact to the human environment as well (e.g., 25 relocations required with Alternative 1 compared to 42 relocations with Alternative 2). Based on the information provided, we would prefer Alternative 1 if a build alternative is selected.

We have reviewed the Project Alternatives to be Evaluated in the Environmental Document and concur that it is adequate and that TDOT should proceed to Concurrence Point 3, Preliminary Draft Environmental Assessment. The signed TESA Concurrence Point 2 for this project is attached.

Thank you for the opportunity to review this document. If you have any questions regarding our comments, please contact John Griffith at 931/525-4995 or by email at [john\\_griffith@fws.gov](mailto:john_griffith@fws.gov).

Sincerely,

**DANIEL**  
**ELBERT**

Digitally signed by  
DANIEL ELBERT  
Date: 2024.09.26  
15:11:33 -05'00'

Field Supervisor

**Tennessee Environmental Streamlining Agreement  
Concurrence Point 2 Concurrence Form  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

The Tennessee Department of Transportation (TDOT) is preparing an Environmental Assessment (EA) for the I-24 Southeast Choice Lanes Project in Davidson and Rutherford Counties. This EA is being developed by TDOT to document the impacts of the subject project in accordance with the *National Environmental Policy Act (NEPA)* and the *Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects (TESA)*. In accordance with TESA, we are requesting your review and concurrence on Concurrence Point 2 (CP2), *Alternatives to be Evaluated in the Environmental Document*.

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Please sign and return this form to Dr. Tammy Sellers at the address below by **September 27, 2024**.

Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA CP2 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA AGENCY: U.S. Fish and Wildlife Service

---

TESA CONTACT: Daniel Elbert, Field Supervisor

---

Print Name Title

CONCUR: DANIEL ELBERT Digitally signed by DANIEL ELBERT  
Date: 2024.09.26 15:11:59 -05'00'

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Signature Date



**DEPARTMENT OF THE ARMY**  
NASHVILLE DISTRICT, CORPS OF ENGINEERS  
REGULATORY DIVISION  
3701 BELL ROAD  
NASHVILLE, TENNESSEE 37214

September 27, 2024

SUBJECT: LRN-2024-00561; TDOT PIN 134727.01; Interstate 24 (I-24) Choice Lanes Project, Agency Concurrence for TESA Concurrence Point 2

ATTN: Ms. Tammy Sellers  
Tennessee Department of Transportation  
505 Deaderick St, Suite 900, J.K. Polk Building  
Nashville, TN 37243

Dear Ms. Sellers,

This letter is in response to your request for agency comments as part of Concurrence Point 2 (CP2), addressing the *Alternatives to be Evaluated in NEPA* (Alternatives Package), for Interstate 24 Choice Lanes project from the interchange of I-24 and I-40 in Davidson County, Tennessee to the interchange of I-24 and I-840 in Rutherford County, Tennessee. This project has been assigned File Number LRN-2024-00561. Please refer to this number in all communication concerning this matter.

The U.S. Army Corps of Engineers, Nashville District (USACE) has reviewed the Alternatives Package and has made a determination of concurrence, provided the comments listed below are adequately addressed. USACE has provided these comments to ensure adequate information is provided to demonstrate compliance with Section 404 of the Clean Water Act. Please note the attached concurrence form for CP 2 dated September 24, 2024.

USACE will work with TDOT and the Federal Highways Administration (FHWA) to ensure effective and efficient processing of this proposal. Per your request for comments on August 28, 2024 regarding Tennessee Environmental Streamlining Agreement (TESA) CP2, USACE reviewed Section 6 of the package (Alternatives Analysis Methodology), Section 7 (Project Alternatives), Section 9 (Public Involvement) and Section 10 (Evaluation of Project Alternatives). USACE has no suggested changes to Section 9. USACE comments for the remaining sections are listed below.

Section 6 (Alternatives Analysis Methodology):

As listed in Section 5.8 (Item E) of the "*Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects Overall Agreement*" dated January 2014 (TESA Agreement), the Alternatives Package should include "quantitative results of the preliminary alternatives analysis...". **Please provide the required quantitative results of the preliminary alternatives analysis.**

Section 5.8 (Item G) of the TESA Agreement, requires the “narrative describing the rationale why each of the proposed alternatives is being carried into the draft environmental document for further analysis, including the identification of those alternatives that were considered for inclusion but were later eliminated along with the rationale of why they were eliminated”. Section 6 of the Alternatives Package makes reference to a previous multimodal study conducted in 2015 (2015 Study) on I-24 that investigated a range of multimodal solutions to address future travel demands along the I-24 from the Kentucky state line to the Georgia state line. A Congestion Action Plan (CAP) from 2022 was also referenced and the conclusion of the CAP was stated to include “widening for the addition of managed lanes, interchange improvements and ramp metering”. **The USACE requests that the range of multimodal solutions and screening criteria considered in the 2015 Study and the CAP be described to explain why none of these solutions/alternatives were carried forward as reasonable build alternatives for evaluation in the upcoming Environmental Assessment.**

Section 5.8 (Item C) of the TESA Agreement, requires the document submitted for review under CP2 should include “revised study approach for establishing the baseline conditions required in the comparison and analysis of each alternative”. Section 6.2 of the Alternatives Package includes an alternatives analysis methodology that lists alternative evaluation metrics including “environmental impacts including natural resources, community and built environment”. However, no discussion of how baseline conditions are established is included. **The USACE requests further discussion on the methodology that TDOT will use to analyze and compare alternatives in relation to environmental impacts, particularly impacts to aquatic resources such as streams, wetlands, and other aquatic features.**

#### Section 7 (Project Alternatives)

Section 7.1 states that an initial evaluation was conducted to determine whether one or two choice lanes would be required in each direction using high-level traffic analysis and considerations to safety and operations to the system. The analysis also included a qualitative evaluation of reversible choice lanes as an option. The section concluded by stating that the initial qualitative screenings recommended two choice lanes in the corridor with no further information. **The USACE requests that a narrative and table be included to identify the criteria that led to this determination and how the options not selected (single choice lane and reversible choice lanes) failed this screening process and did not meet the category of reasonable build alternatives.**

#### Section 10 (Evaluation of Project Alternatives)

Section 5.8 (Item E) of the TESA Agreement, requires the Alternatives Package to include “analysis of environmental impacts (based on existing data sources/GIS

inventories)” and Item H requires the package to include “results of the field review conducted for the project”. Table 10.1 includes a table of environmental resources to be considered during the alternatives analysis, including streams, but does not list any values for projected stream impacts associated with each alternative. **Please provide this information related to projected stream impacts for each alternative.**

#### Section 404 (b) (1) Guidelines

When moving forward with the next phase of alternatives analysis, the USACE suggests that documentation is provided to help facilitate completion of the 404(b)(1) guidelines (40 CFR 230) analysis during the permitting phase. According to the 404(b)(1) guidelines “no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.” **The 404(b)(1) guidelines require a determination that the applicant's preferred alternative is the least environmentally damaging practicable alternative (LEDPA), considering cost, logistics, and existing technology in light of the overall project purpose.** The USACE suggests that you provide a detailed analysis of any on-site and off-site alternatives considered that would accomplish the project purpose while avoiding and minimizing impacts to waters of the U.S. The alternatives analysis should discuss all relevant factors that influence or constrain the location, size, or other characteristics of the project, such as presence of waters of the U.S., cultural resources sites, endangered species, or other relevant constraints. Please identify all criteria and weighting factors used to evaluate and rate on-site and off-site alternatives, provide an evaluation of the practicability and environmentally damaging effects for each alternative, describe/justify the geographic boundaries used to determine potentially suitable alternative sites, and quantify the anticipated impacts to waters of the U.S. at each alternative site. Each alternative should be evaluated with the same level of detail and using the same methodology, including avoidance and minimization measures to reduce impacts to waters of the U.S.

For non-water dependent activities associated with discharges in special aquatic sites (i.e., wetlands), practicable alternatives that do not involve discharges in these sites are presumed to be available, unless clearly demonstrated otherwise. For activities associated with discharges in special aquatic sites, an additional presumption is that all practicable alternatives that do not require discharges in these sites are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise. The permit applicant has the opportunity to rebut these presumptions within the alternatives analysis.

For more guidance on developing an alternatives analysis that satisfies the requirements of the 404(b)(1) guidelines, please see the attached documents

*“Information for Preparing an Alternatives Analysis under Section 404”* dated June 2014 and the American Association of State Highway and Transportation Officials (AASHTO) *“Applying the Section 404(b)(1) Guidelines in Transportation Project Decision-Making”*. Incorporation and evaluation of alternatives in sufficient detail to document compliance with the 404(b)(1) Guidelines at this stage of the review will help minimize review time and project hurdles during the permitting phase.

Cumulative Effects:

Section 5.8 (Item I) of the TESA Agreement, requires the document submitted for review under CP2, where substantial impacts are anticipated, should include “a refined study approach, including the spatial and temporal limits of any indirect/cumulative impact analyses.”

When moving forward with the next phase of alternatives analysis, the USACE suggests that documentation is provided to help facilitate completion a cumulative effects determination, in regard to impacts on the aquatic environment. The USACE must consider the cumulative effects associated with the proposed project on the aquatic environment in order to evaluate it under Section 404(b)(1) Guidelines.

The determination of cumulative effects assessment (CE) for an appropriately sized watershed should, at a minimum, include the following information:

- a. Identify relevant past, present, and reasonably foreseeable future activities:
  - i. Consider and describe how past activities have historically affected and will continue to detrimentally affect the aquatic resources of concern for the proposed project. Consider other present actions, such as other TDOT projects, that may be detrimentally affecting the aquatic resources of concern.
  - ii. Estimate the acreage of watershed that will be directly or indirectly affected by future activities, such as other TDOT projects. This information should be appropriately depicted on a CE map.
  - iii. The discussion should be specific and should include summary tables for impacts to waters of the U.S. for past, present, and reasonably foreseeable future activities.
- b. Describe the project-related effects on the aquatic environment:
  - i. Using data collected within the watershed, describe how the proposed project, in addition to past and reasonably foreseeable future activities, such as other TDOT projects, would be expected to affect aquatic resources within the Hydrologic Unit Code (HUC) 8 watershed. The discussion should be specific, and should include

summary tables for impacts to waters of the U.S. Consider and describe the direct and indirect effects, as well as evaluate what cumulative effects might occur because of other actions, including those actions outside the USACE regulatory jurisdiction.

- ii. Estimate the length and/or acreage of impacts to waters of the U.S. that are predicted to occur as a result of the proposed project in combination with other reasonably foreseeable future activities, such as other TDOT projects. The discussion should be specific and should include summary tables for impacts to waters of the U.S. for the proposed project and for reasonably foreseeable future activities.
- iii. Estimate the surface acreage of the watershed that is predicted to be impacted as a result of the proposed project in combination with other reasonably foreseeable future activities, such as other TDOT projects. This information should be appropriately depicted on a CE map.

We appreciate your consideration of our comments and look forward to collaborating on this project. If you have any questions, please contact me by telephone at 865-393-0971, or via email at [travis.a.wiley@usace.army.mil](mailto:travis.a.wiley@usace.army.mil)

Sincerely,



Travis Wiley.  
Transportation Manager  
Technical Services Branch  
Regulatory Division

#### Attachments

1. CP2 Concurrence Form
2. Information for Preparing an Alternatives Analysis under Section 404
3. Applying the Section 404(b)(1) Guidelines in Transportation Project Decision-Making

**Tennessee Environmental Streamlining Agreement  
Concurrence Point 2 Concurrence Form  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

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Please sign and return this form to Dr. Tammy Sellers at the address below by **September 27, 2024**.

Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA CP2 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA AGENCY: U.S., Army Corps of Engineers, Nashville District

TESA CONTACT: Travis Wiley Transportation Program Manager  
Print Name Title

CONCUR: Travis Wiley September 27, 2024  
Signature Date

**Tennessee Environmental Streamlining Agreement  
Concurrence Point 2 Concurrence Form  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

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Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA CP2 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA AGENCY: Tennessee Wildlife Resources Agency

TESA CONTACT:	<u>Casey Parker</u>	<u>West TN Transportation Biologist</u>
	Print Name	Title
CONCUR:	<u>Casey Parker</u>	<u>9/24/2024</u>
	Signature	Date

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Concurrence Point 2 Concurrence Form  
I-24 Southeast Choice Lanes Project  
Davidson & Rutherford Counties, Tennessee  
PIN 134727.01**

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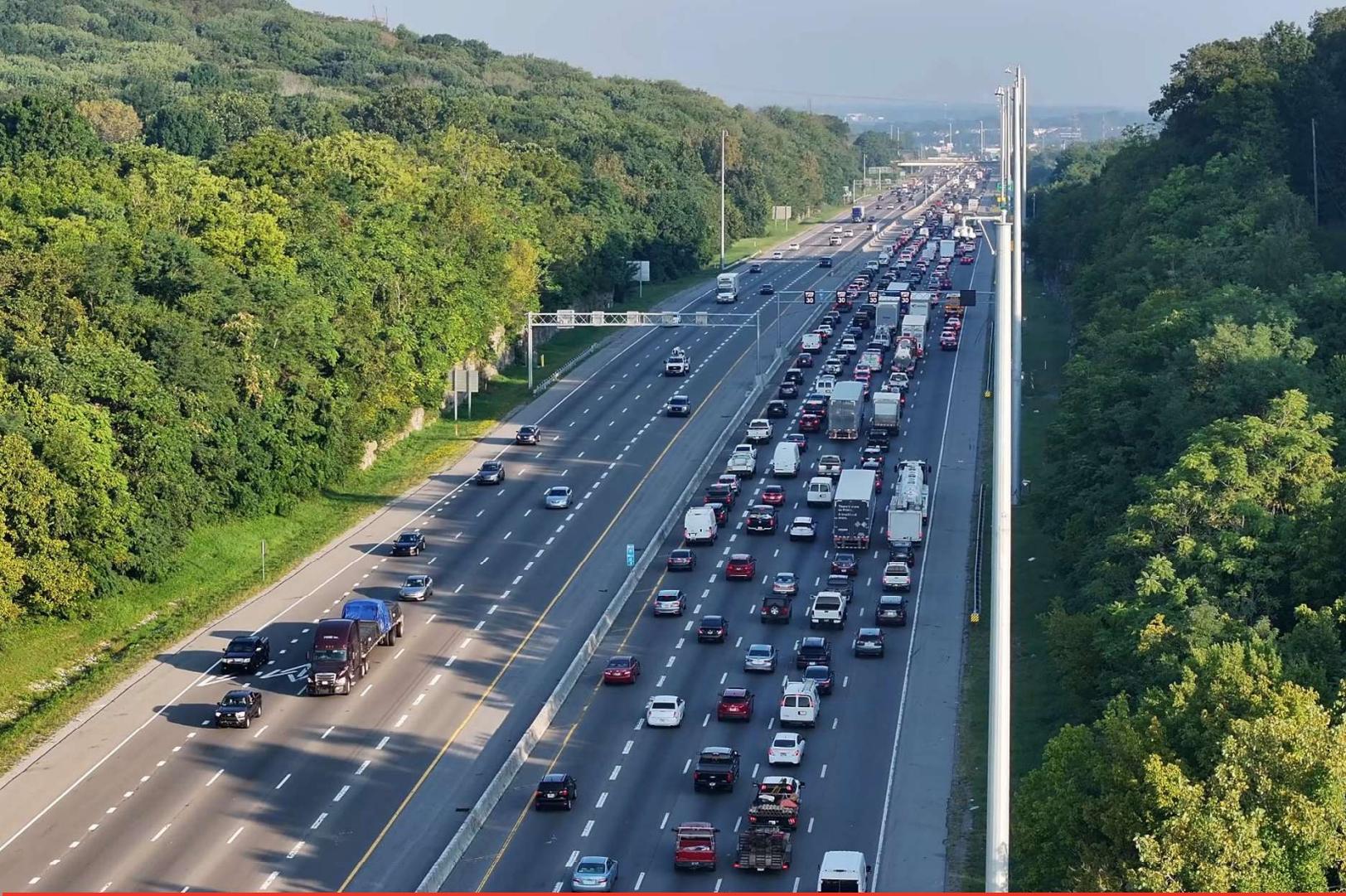
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Tammy Sellers  
TDOT Environmental Division  
[Tammy.Sellers@tn.gov](mailto:Tammy.Sellers@tn.gov)

If you feel all provisions of TESA CP2 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA AGENCY:	Tennessee Department of Environment and Conservation	
<hr/>		
TESA CONTACT:	Jennifer Tribble	Director, Office of Policy and Planning, TDEC
	Print Name	Title
<hr/>		
CONCUR:		September 25, 2027
	Signature	Date



# TENNESSEE ENVIRONMENTAL STREAMLINING AGREEMENT (TESA) CONCURRENCE POINT 2

I-24 SOUTHEAST CHOICE LANES PROJECT

August 2024



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## ISSUE AND REVISION RECORD

Revision	DATE	Preparer(s)	PMC Reviewer(s) <sup>1</sup>	PMC Approver <sup>2</sup>	Description/ NOTES
			TDOT REVIEWER(S)	TDOT APPROVER	
A	08/08/2024	Joy Riley, Katie McKeel	Joy Riley	Eric Saggars	Working DRAFT submittal
	08/19/2024	---	Erick Hunt-Hawkins, TDOT	Tammy Sellers, TDOT	Working DRAFT submittal review
B	08/26/2024	Joy Riley, Katie McKeel	Joy Riley	Eric Saggars	DRAFT submittal
		---			DRAFT submittal review
C					DRAFT FINAL submittal
		---			<i>No review requirement</i>

1. **PMC:** list the PMC deliverable manager; **Consultants:** list the PMC service category delivery manager or their designee
2. **PMC/Consultant:** list the PMC program or service category delivery manager or their designee

## SHAREPOINT PATH

[I-24 Nashville Choice Lanes Project/Environmental Services/Agency Coordination/Agency Coordination Letters/TESA Concurrence Points/Concurrence Point 2](#)



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**APPENDICES**

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## ACRONYMS AND ABBREVIATIONS

ACRONYM/ABBREVIATION	DEFINITION
CAPs	Congestion Action Plans
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
EJ	Environmental Justice
EPA	Environmental Protection Agency
ETC	Equity Transportation Community
ETSA	Environmental Technical Study Area
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
GNRC	Greater Nashville Regional Council
I-	Interstate
LWCF	Land and Water Conservation Fund
MOU	Memorandum of Understanding
MP	Mile Point
mph	Miles Per Hour
MSA	Metropolitan Statistical Area
NEPA	National Environmental Policy Act
NOI	Notice of Intent
P3	Public-Private Partnership
PEL	Planning and Environmental Linkages
PIP	Public Involvement Plan
ROW	Right-of-Way
TDEC	Tennessee Department of Environment and Conservation
TDOT	Tennessee Department of Transportation
TESA	Tennessee Environmental Streamlining Agreement

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<b>THC</b>	Tennessee Historical Commission
<b>THRC</b>	Tennessee Human Rights Commission
<b>TMA</b>	Transportation Modernization Act
<b>TN-SHPO</b>	Tennessee State Historic Preservation Office
<b>TWRA</b>	Tennessee Wildlife Resources Agency
<b>USACE</b>	United States Army Corps of Engineers
<b>USC</b>	United States Code (U.S. Code)
<b>USDA</b>	United States Department of Agriculture
<b>USDOT</b>	United States Department of Transportation
<b>USFWS</b>	United States Fish and Wildlife Service
<b>UST</b>	Underground Storage Tank

## **TDOT PROGRAM TEAM NAMES**

<b>TEAM NAME</b>	<b>TEAM MEMBERS</b>
<b>PMT</b>	The HNTB Team
<b>Consultants</b>	Consultants supporting program identification/project selection
<b>Project Team</b>	TDOT + PMT + Consultants

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# 1. INTRODUCTION

The Tennessee Department of Transportation (TDOT) in cooperation with the Federal Highway Administration (FHWA), is proposing to improve Interstate 24 (I-24) from the Interchange of I-24 and I-40 in Davidson County to the Interchange of I-24 and I-840 in Rutherford County, Tennessee. An Environmental Assessment (EA) is being developed by TDOT to identify and evaluate the environmental effects of the proposed Project and to identify measures to avoid and minimize impacts. In accordance with the National Environmental Policy Act (NEPA) and the Tennessee Environmental Streamlining Agreement (TESA), agency coordination is being conducted under the Project Coordination Plan for this proposed Project. This plan outlines the project coordination and concurrence points planned for this proposed Project.

This document serves as the *Alternatives to be Evaluated* package required for Concurrence Point 2 (CP2) under TESA for the Environmental and Regulatory Coordination of Major Transportation Projects. In addition, this concurrence point will include modifications to *Concurrence Point 1, Project Study Area and Project Purpose and Need*.

This Alternatives to be Evaluated package is being distributed to the TESA Agencies listed below:

- US Army Corp of Engineers (USACE) Nashville District
- Tennessee Department of Environment & Conservation (TDEC)
- US Fish & Wildlife Service (USFWS)
- Tennessee Valley Authority (TVA)
- Tennessee State Historic Preservation Office (TN-SHPO)
- Tennessee Wildlife Resources Agency (TWRA)

At CP2, FHWA (the lead federal agency) and TDOT (the joint lead agency) are requesting formal concurrence from the TESA agencies on the alternatives to be evaluated in the EA.

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## 2. PROJECT OVERVIEW

### 2.1. Transportation Modernization Act

In early 2023, Governor Bill Lee signed the Transportation Modernization Act (TMA) into law 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 TMA allows TDOT to expand its alternative project delivery methods, including the utilization of **Public-Private Partnerships (P3s)** and Choice Lanes

**Public-Private Partnerships (P3s)** are partnerships formed between public entities like TDOT and private companies, allowing Tennessee to better allocate the limited resources for transportation projects by leveraging private-sector innovation and capital. Private-sector partners would design, build, finance, operate and maintain Choice Lanes projects. P3s allow for shared risks, accelerated project delivery, provide access to additional capital, enable a longer-term view of asset management and can reduce public cost. Any debt from Choice Lanes projects could be privately financed without obligations to the state.

to deliver its urban congestion reduction improvement projects.

Choice Lanes are priced managed lanes that use pricing to proactively manage demand and provide travel time reliability. Choice Lanes allow motorists to maintain consistent travel speeds even when the adjacent existing lanes are congested. Choice Lanes are new lanes and typically operate at around 45 miles per hour (mph) during rush hours.

The additional state funding provided through the TMA expands TDOT's federal dollar capabilities and accelerates urban congestion projects, including Choice Lanes. TDOT's [10-Year Project Plan](#) identified the I-24 corridor southeast of

Nashville between I-40 and I-840 as a priority urban congestion relief project to deliver as Tennessee's first Choice Lanes project. The proposed Choice Lanes on I-24 Southeast are part of a larger program of proposed Choice Lanes projects in some of the most congested areas of Tennessee.

### 2.2. Project Overview

The proposed I-24 Southeast Choice Lanes project would improve travel time reliability and regional connectivity issues along approximately 26 miles of I-24 between I-40 near Downtown Nashville and I-840 near Murfreesboro. The proposed Project would address unreliable trip times for commuters, including those commuting via passenger vehicles or transit, and regional connectivity. Specifically, considering financial constraints, the proposed Project seeks to leverage the user fee financing mechanisms provided by the

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TMA. The proposed Project would not only bolster connectivity between Nashville and Murfreesboro but would also amplify access to employment areas, healthcare services, educational facilities and a spectrum of regional resources that extend beyond the proposed Project corridor. The proposed Choice Lanes would involve a contract with a private-sector partner to design, build, finance, operate and maintain the new, optional lanes through a P3. The Project study area includes 26 miles of interstate segments:

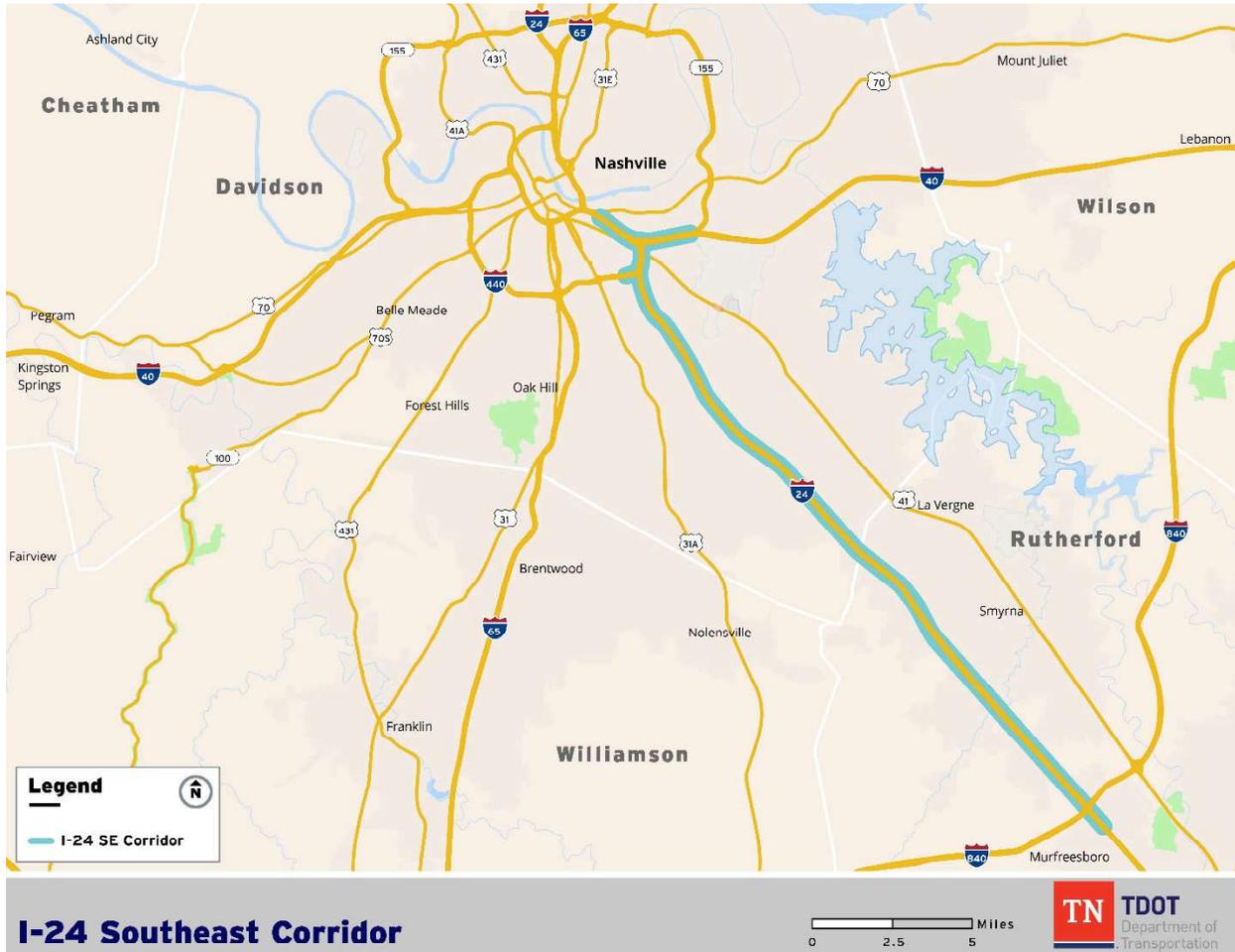
- I-40, from the Browns Creek to Briley Parkway
- I-24, from I-40 to I-840 (south of Downtown Nashville)

TDOT is advancing the proposed I-24 Southeast Choice Lanes project by initiating surveys and field studies as part of the NEPA development process. The final study area complies with the TDOT Environmental Technical Study Areas (ETSA) Guidance. An ETSA is developed for a project to document natural, cultural and community resources within a broader study area than the immediate project footprint. By documenting all resources within this broader area TDOT staff can better plan for and potentially mitigate any impacts to these resources as projects progress. The ETSA Guidance for interstate widening projects requires the boundary be set a minimum of 50 feet past the proposed Right-of-Way (ROW) line, or proposed slope lines, whichever is greater.

The initial planning included the development and screening of a preliminary range of Choice Lane alternatives which were refined to reach a set of Reasonable Alternatives. The Reasonable Alternatives for the I-24 Southeast corridor will be advanced through the NEPA process.

The following project location map provides a visual overview of the proposed I-24 Southeast Choice Lanes project identified in the TDOT 10-Year Project Plan published on December 18, 2023, which has committed funding.

**Figure 2-1: Project Location Map**



**I-24 Southeast Corridor**

*This figure depicts the proposed Project study area which comprises 26 miles of improvements associated with the Project including mainline improvements on I-24 from the system-to-system interchange of I-24 and I-40 near downtown Nashville to the system-to-system interchange of I-24 and I-840 near Murfreesboro. The proposed Project study area also includes improvements on I-40 associated with the system-to-system interchange improvements at I-24 and I-40 and includes improvements on I-440 associated with the interchange improvements at the I-24 at I-440 system-to-system interchange.*

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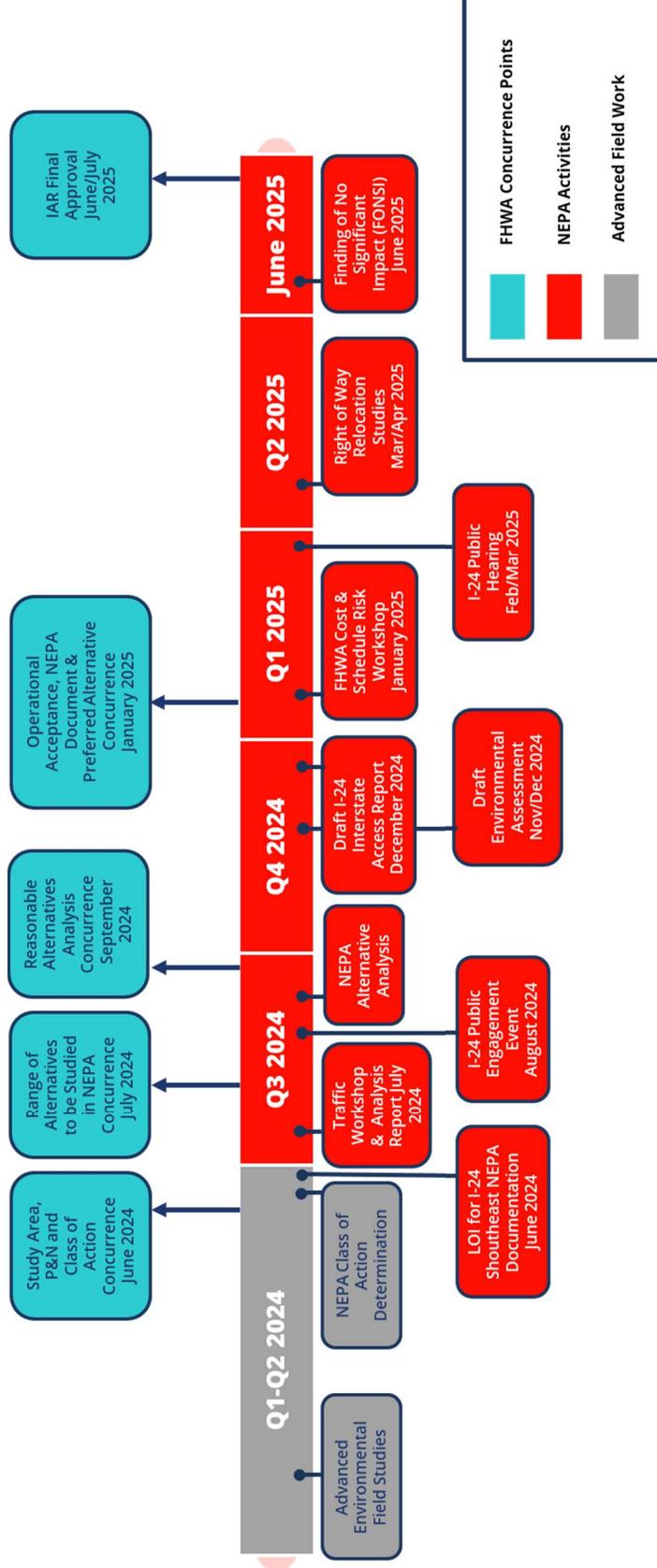
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Figure 2-2 presents high-level details of the anticipated schedule for the I-24 Southeast Choice Lanes project.

Figure 2-2: I-24 Southeast Choice Lanes Project Schedule





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### 3. SUMMARY OF TESA CONCURRENCE POINT 1

In June 2024, TDOT requested that the TESA agencies review and concur with the Purpose and Need and Study Area package prepared for Concurrence Point 1 (CP1).

All the TESA agencies concurred with CP1 for the proposed I-24 Southeast Choice Lanes project in July 2024. Eight of the agencies signed and returned their concurrence signature page, this included the EPA who is no longer participating as part of TESA. **Table 3-1** summarizes the comments received from the agencies who submitted comments with their signed concurrence signature pages. It should be noted that TVA responded but declined to participate as a cooperating agency in the TESA process on this proposed Project.

**Table 3-1: Agency Comment Summary for TESA Concurrence Point 1**

Agency	Comments
<b>US Army Corp of Engineers (USACE), Nashville District (permit)</b>	In advance of the meeting this morning, I attached our letter agreeing to work as a cooperating agency on the I-24 Corridor Project and a concurrence form for CP1.
<b>Tennessee Department of Environment &amp; Conservation (TDEC) (permit)</b>	I am confirming that I will serve as the coordinating entity for TDEC. We would like to be included as a participating agency. Dr. Jennifer Tribble of TDEC will coordinate a review of this scoping project. She will likely reach out to other divisions within TDEC to gauge which divisions may need to review the materials and contribute to a TDEC response.
<b>US Fish &amp; Wildlife Service (USFWS)</b>	The TDOT and the FHWA have requested that the U.S. Fish and Wildlife Service (Service) be a participating agency in the development of the Environmental Assessment. We have reviewed the Project Coordination and Public Involvement Plan provided and accept the invitation to be a participating agency in the development of the I-24 Southeast Choice Lanes Project in Davidson and Rutherford counties, Tennessee. Acceptance of this request does not imply that the Service supports the proposal or has any special expertise with respect to the evaluation of the project. Our office will strive to provide timely input, participate in coordination meetings, and comment on the design elements. We look forward to participating in the development of this project.

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Agency	Comments
<b>US Environmental Protection Agency (US EPA), Region 4 (Non-TESA Agency Response)</b>	P&N – Based on our preliminary review of the statement, concurs that TDOT can move beyond the project purpose and need for the project. Additional information that includes evidence, study reference, or data that supports that supports reliability and connectivity concerns would strengthen the purpose and need statement.
<b>TDEC Division of Natural Areas</b>	See response above from TDEC.
<b>Tennessee Valley Authority (TVA)</b>	TVA has thoroughly researched the location of the I-24 Choice project lanes; TVA has no land rights along this corridor and any Section 26a jurisdiction falls within the Interpretive Rule (IR). Please see the attached information regarding the IR. TVA will not be a cooperating agency in the TESA process. <a href="https://www.federalregister.gov/documents/2016/08/31/2016-20093/when-obstructions-on-certain-tributaries-of-the-tennessee-river-do-not-require-a-section-26a-permit">https://www.federalregister.gov/documents/2016/08/31/2016-20093/when-obstructions-on-certain-tributaries-of-the-tennessee-river-do-not-require-a-section-26a-permit</a> .
<b>Tennessee State Historic Preservation Office (TN-SHPO)</b>	We accept the invitation to be a Participating Agency with TDOT and FHWA in the development of the EA for the I-24 Southeast Choice Lanes Project, TDOT PIN 134727.01.
<b>Tennessee Wildlife Resources Agency (TWRA)</b>	Attached is our agency's official signed acknowledgement for CP1.

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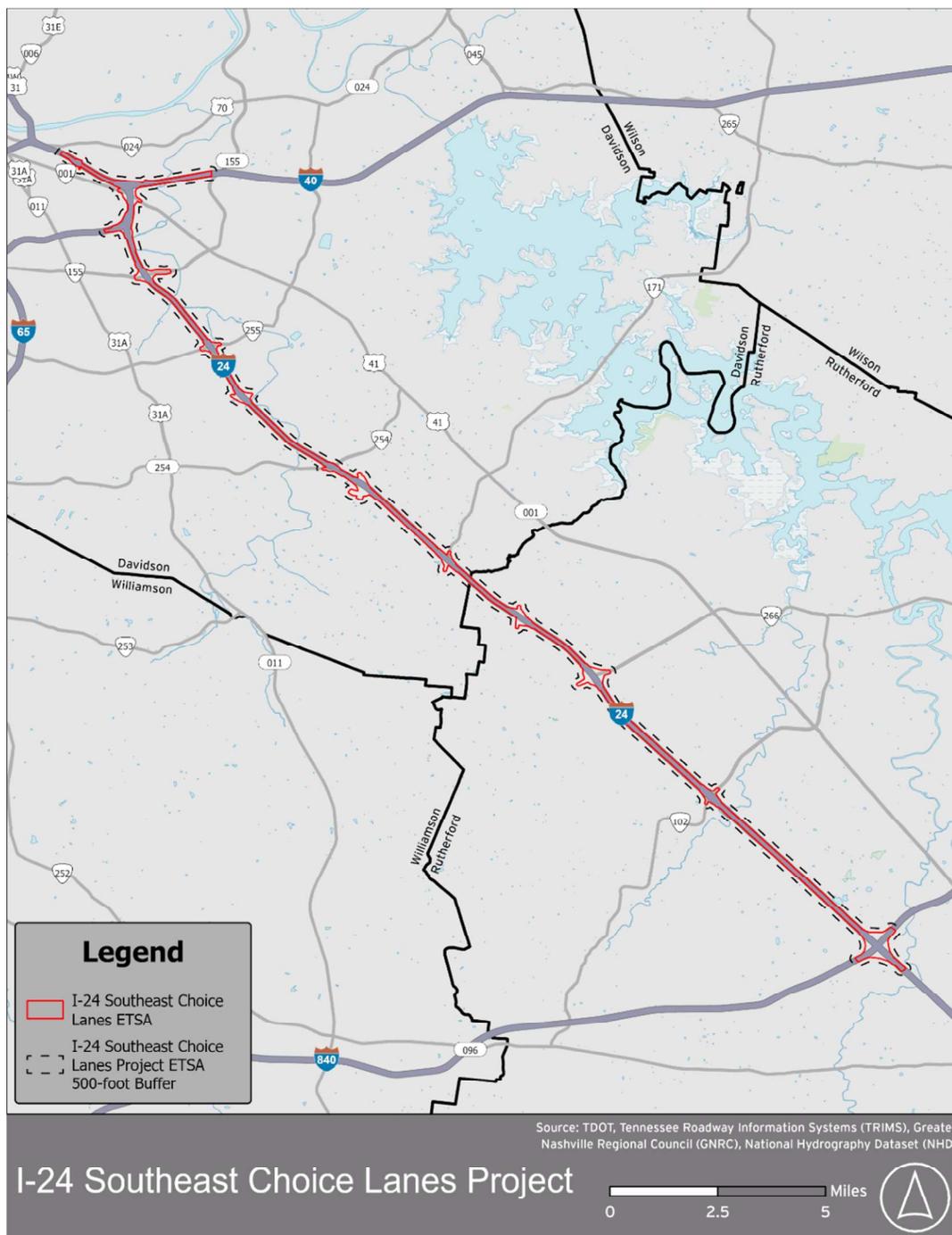
## 4. PROJECT STUDY AREA

The Project study area outlines the boundaries established for conducting field studies and evaluating impacts during the development of Project alternatives. The Project study area was presented in CP1, with which the agencies concurred.

The study area complies with the TDOT ETSA Guidance. The ETSA is a study area used by TDOT that incorporates a broad area to account for community resources, natural resources, and other potential environmental constraints as a standard for TDOT projects. This ETSA serves as boundaries for field surveys and focuses on areas of potential direct impacts arising from land acquisition, construction and implementation of proposed interstate improvements. Following TDOT’s general ETSA guidance, the ETSA for the proposed Project extends at least 300 linear feet beyond project limits. For side roads, interchanges and ramps, the study area extends at least 150 linear feet beyond tie-in points or ramps. Throughout the corridor, the ETSA generally extends 100 linear feet beyond the existing ROW. This document refers to the proposed Project ETSA plus a 500-foot buffer as the “study area.” The 500-foot buffer is included to offer a more comprehensive analysis of people and places that may be directly or indirectly affected by the proposed Project.

**Figure 4-1** depicts the study area for the 26 miles of improvements associated with the proposed Project, which includes mainline improvements on I-24 from the system-to-system interchange of I-24 and I-40 near downtown Nashville to the system-to-system interchange of I-24 and I-840 near Murfreesboro. The study area also includes improvements on I-40 associated with the system-to-system interchange improvements at I-24 and I-40 and includes improvements on I-440 associated with the interchange improvements at the I-24 at I-440 system-to-system interchange.

Figure 4-1: I-24 Southeast Project Study Area



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## 5. PROJECT PURPOSE & NEED

The purpose and need and Project study area were presented in CP1, with which the TESA agencies concurred. Since the development of CP1, the purpose and need statement has been revised after additional input was received from FHWA. The statement was modified to provide a separate purpose statement and a separate need statement. In addition to this change, the references to the TMA and user fee financing have been removed from the purpose and need statements and added to the project goals. The statement remains consistent with what was presented to the TESA agencies, and the changes were intended to provide additional clarity.

### 5.1. Need for the Project

The need for the proposed Project is found in the unreliable trip times that affect regional connectivity and multimodal mobility along approximately 26 miles of I-24 between I-40 south of downtown Nashville and I-840 near Murfreesboro.

### 5.2. Purpose of the Project

The purpose of the proposed Project is to improve travel time reliability and regional connectivity issues along approximately 26 miles of I-24 between I-40 south of downtown Nashville and I-840 near Murfreesboro. The proposed Project would address unreliable trip time for commuters, including those commuting via passenger vehicles or transit, regional connectivity issues and multimodal mobility.

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## 6. ALTERNATIVES ANALYSIS METHODOLOGY

### 6.1. Previous Multimodal Corridor Studies

In 2015, TDOT conducted the [I-24 Multimodal Corridor Study](#)<sup>1</sup> 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. The purpose of the study was to recommend a range of cost-effective projects and strategies that would make I-24 safer and more efficient. The study evaluated a wide range of multimodal strategies to address the mobility issues along the entire I-24 corridor from the Kentucky state line to the Georgia state line. The study also concluded that TDOT could not afford to continue adding lanes to the interstates as the only solution to reduce congestion in urban areas. Freight, transit and managed lane strategies would be critical to help manage and maintain the current utility of the interstate facilities in Tennessee. Several of the recommended projects were implemented as part of this study as interim congestion management solutions along the I-24 Southeast corridor. The study recommended that legislation be explored that would allow for the implementation of managed lanes including allowable access restrictions, express lanes, and variable pricing. As a follow-up to these recommendations, TDOT conducted a Congestion Action Plan (CAP) in 2022 which recommended interstate improvements on the I-24 Southeast corridor to include widening for the addition of managed lanes, interchange improvements and ramp metering. The CAP considered congested speeds, travel time and the reliability of transit service and outlined the need for a formal strategy to manage congestion on the urban interstates in Tennessee. The additional state funding and user fee financing mechanisms provided through the TMA allowed TDOT to initiate development of the proposed I-24 Southeast Choice Lane project recommend in the planning studies.

### 6.2. Alternatives Analysis Methodology

The Project team initiated development of preliminary managed lane or Choice Lanes alternatives based on the recommendations from previous planning studies described in the previous section. The methodology to be utilized in the evaluation of preliminary Project alternatives will be based upon the following criteria:

- Evaluation of Preliminary Alternatives based on the ability to meet the purpose and need;
- Ability to address project goals;

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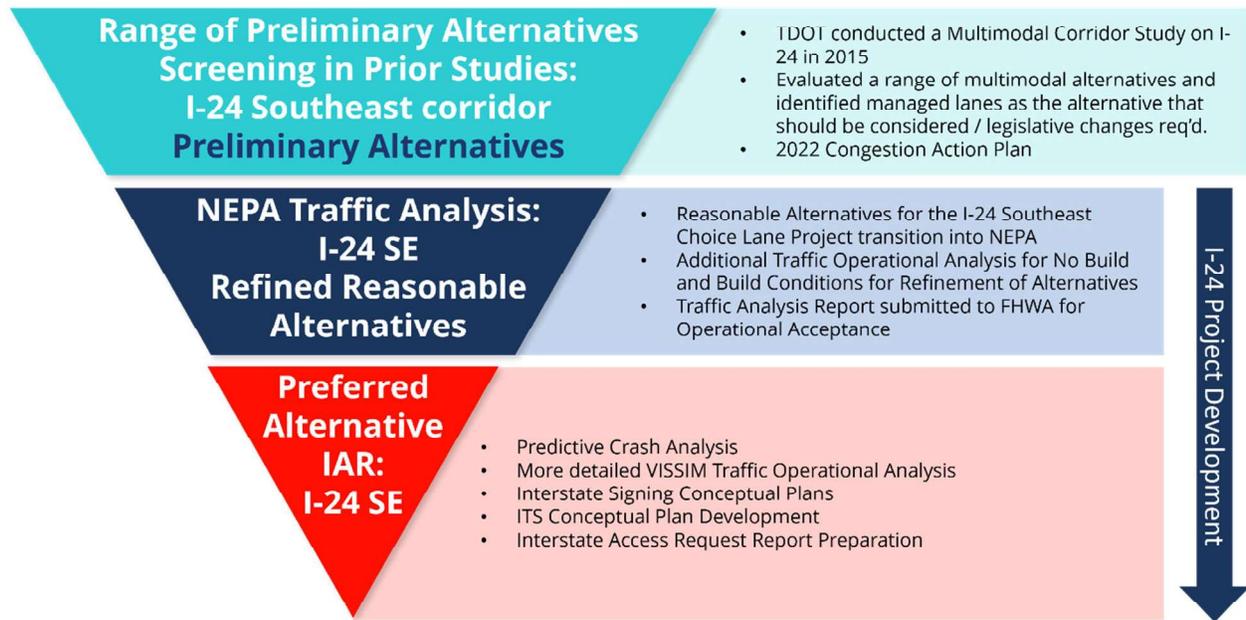
<sup>1</sup> TDOT, “Interstate 24 Multimodal Corridor Study,” 2015. Accessed via [TDOT Corridor and Feasibility Studies](#) web page, August 8, 2024.

- Engineering feasibility and safety considerations;
- Environmental impacts including natural resources, community and built environment; and
- Consideration of Public, Agency and Stakeholder input

The analysis of the Preliminary Alternatives evaluated traffic and safety, engineering, environmental, community and planning-level cost estimates to determine the geometric feasibility of the alternative. The Preliminary Alternatives that meet the purpose and need and provide acceptable traffic operations were further evaluated through travel demand modeling during the projected years. The results of this analysis were used to refine these alternatives and they will move forward as the Refined Reasonable Alternatives to be evaluated in NEPA.

This screening effort is depicted below in **Figure 6-1**.

**Figure 6-1: Alternatives Development Process**



*This figure depicts the process through which the preliminary range of managed lane alternatives which were recommended in the previous corridor studies will be screened to a set of Reasonable Alternatives which are further refined through traffic analysis during the NEPA alternatives analysis to a recommended Preferred Alternative which is analyzed through traffic design and presented in the Interstate Access Report to FHWA for final approval to advance forward to final design and construction.*

## 7. PROJECT ALTERNATIVES

The Project Team initiated development of the preliminary Choice Lanes alternatives in accordance with the recommendations of the corridor and congestion studies.

### 7.1. Number of Choice Lanes

At the initiation of this effort, the Project Team evaluated whether one or two Choice Lanes would be required in each direction using high-level traffic analysis and considerations to the safety and operations of the system. This initial evaluation also included a qualitative evaluation of reversible Choice Lanes as a possible option.

Ultimately these initial qualitative screenings recommended that a corridor that supports two Choice Lanes in each direction will improve reliability and to enhance safety and operations within the project corridor.

### 7.2. Separation Applications

After the number of Choice Lanes needed was determined, the Project Team evaluated the options for separation applications that could be used to separate the general-purpose lanes from the proposed Choice Lanes. There are four types of separation application alternatives which include:

- concrete barriers
- flexible delineators with 4-foot buffers
- buffered pavement markings with rumble strips
- grade separated facilities with concrete barriers

The preliminary widening alignment evaluated a concrete barrier separation between the proposed Choice Lanes and the general purpose lanes. The alignment with a concrete barrier separation doubled the width of the existing pavement along the corridor, leading to a significant amount of Right-of-Way (ROW) impacts and cost. Due to the ROW impacts and cost, this alignment was determined to be unreasonable and was eliminated from consideration.

Another widening alignment evaluated a flexible delineator separation application with a four-foot buffer between the Choice Lanes and the general purpose lanes. This alignment is preferred in more constrained urban corridors, to reduce the proposed Project footprint and to minimize ROW acquisition and construction costs. The delineator separation also allows for operational flexibility and increased safety in the proposed Choice Lanes.

The buffered pavement markings with rumble strips were not considered desirable due to the absence of a clear visual buffer between the proposed Choice Lanes and the general purpose lanes.

While the grade separated facilities with concrete barriers is not being considered as a holistic alternative along the entire corridor, it will be applied along the corridor in sections where the proposed Choice Lanes are being elevated to minimize impacts to the natural and human environment.

### 7.3. Widening Concepts

The initial concepts included evaluating two potential widening concepts:

- widening with Choice Lanes on the outside of the existing corridor
- widening with Choice Lanes on the inside of the existing corridor.

As the initial design concepts were developed, the overall concept evolved into a combination of Choice Lanes to the inside and outside due to the opportunities in some sections to easily widen to the grassed median. Other sections of the corridor are heavily constrained and widening to the outside is the most feasible option.

#### Access Points

The Project team initiated this process by identifying all the potential access locations and evaluating the feasibility of access at each location. The feasibility was evaluated based on travel demand (AADT), adjacent land uses, potential future growth in land uses and physical and environmental constraints. The cost and complexity of construction was also considered as a secondary factor in the initial evaluations.

A tiered approach to identifying potential access points on the corridor for Choice Lanes was utilized in the screening process:

1. **Tier 1** access would include direct connection access to Choice Lanes with exclusive ramps in the interstate system to system interchanges. Tier 1 access would allow Choice Lane users to experience improved travel times and operations through these interchanges within the Choice Lane exclusive ramps.
2. **Tier 2** access would include new ingress and egress points from the interstate corridor Choice Lanes to the arterial streets at locations which currently have general purpose access through dedicated Choice Lane ramps within the existing interchange. This allows Choice Lane users to make the decision on the arterial street to access the choice lane system and enter the Choice Lane access ramp within the interchange, and the user will enter the Choice Lane system directly without having to mix with general purpose traffic through the interchange.
3. **Tier 3** access includes creating new exclusive Choice Lanes direct connection ingress and egress points from arterial streets that currently intersect with the interstate at existing overpasses or underpasses where there is currently no interstate access. In this access scenario, a new interstate interchange would be created that would be signed for direct access to Choice Lanes. Users entering the interstate at these locations would enter the Choice Lane system directly and would not have access to

the general-purpose lanes until the next Choice Lanes exit opportunity within the Choice Lanes system.

4. **Tier 4** access includes access points within the Choice Lane system that allow opportunities for users to exit or enter the Choice Lanes directly from the general-purpose lanes along the mainline of the interstate.

Tier 1 and Tier 2 access is the most desirable for an operationally efficient Choice Lane system. In addition to the considerations outlined in Tiers 1-4, other considerations in the screening process included access spacing or frequency of access, types of access, efficiency of Choice Lane entry and exits points and potential congestion within the Choice Lane system. Choice Lanes access points are recommended to be located no more than two to three miles apart along the corridor. Operationally, the dedicated Choice Lane access ramps provide more efficient operations as opposed to direct merge access from the general-purpose lanes. Consideration should also be given to designing termination points for the Choice Lanes in areas that are not heavily congested to reduce the risk of traffic congestion in the Choices Lanes. This is challenging on a heavily congested urban corridor. The Choice Lane termination points should be designed to allow the Choice Lane user options to enter the general-purpose lanes or efficiently exit the system minimizing the number of lane changes required.

Each potential access point location was identified and assigned a tier using the tiered system outlined above. Preliminary design concepts were developed and evaluated for geometric feasibility based on the factors described above. During this process, traffic operational analysis was conducted for each interchange concept to screen the viability interchange modifications.

The Environmental Assessment (EA) will describe the preliminary design concepts considered and eliminated through this process. Those preliminary design concepts determined to be reasonable and feasible were further evaluated with additional traffic operational modeling and analysis. During the traffic analysis, the alternatives were refined and are being recommended as the Reasonable Alternatives to be analyzed in NEPA.

#### **7.4. No-Build Alternative**

The No-Build Alternative will be analyzed during NEPA. The No-Build Alternative would maintain the highway in its existing configuration and will provide the baseline for comparison with the build alternatives. The No-Build Alternative would include committed projects within the study area that are identified in the Statewide Transportation Improvement Program (STIP).

## 7.5. Reasonable Build Alternatives

Two Reasonable Build Alternatives have been developed during the preliminary project screening and analysis. Both alternatives would include widening along the existing alignment of I-24 to add two additional Choice Lanes in each travel direction. The widening would primarily be to the median in the sections of I-24 where a grassed median was available. In the sections of I-24 where there was no median, the alignments would be a combination of widening to the outside and to the inside. In many areas, the proposed shifts from inside to outside are being influenced by anticipated interchange modifications to provide Choice Lanes access. In the more densely developed sections of the corridor, the Choice Lanes are proposed on elevated structures along the outside of the existing travel lanes to minimize impacts to the community. **Table 7-1** describes the two Reasonable Build Alternatives and demonstrates the differences between the two alternatives. Due to the length of the proposed Project, maps are not included in this CP2 package. However, the Reasonable Build Alternatives are available for review on the I-24 Southeast Choice Lanes project website at the link below:

<https://www.tn.gov/tdot/projects/region-3/interstate-24-choice-lanes-.html>

**Table 7-1: Reasonable Build Alternatives Comparison**

Reasonable Alternative #1	Reasonable Alternative #2
<p><b>I-40 alignment to West</b> is <u>elevated on the inside</u> between I-24 and Elm Hill Pike interchange towards Downtown and terminates with a direct merge just before Fesslers Lane</p>	<p><b>I-40 alignment to West</b> is <u>elevated on the outside</u> between I-24 and Elm Hill Pike interchange towards Downtown and terminates with a direct merge just before Fesslers Lane</p>
<p><b>I-40 alignment to East</b> is <u>elevated to the outside</u> positioning Choice Lane (CL) terminus closer to exits at Briley Pkwy and BNA; CL terminates just prior to the Briley Pkwy interchange</p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>
<p><b>I-24 mainline between I-440 and I-40</b> is <u>elevated both directions to the West side</u> of mainline reducing ROW impacts and taking advantage of state property</p>	<p><b>I-24 mainline between I-440 and I-40</b> is <u>elevated to the outside on both sides</u> of the existing mainline between I-440 and I-40</p>
<p><b>I-440 interchange</b> CL ramps are to the <u>inside</u> on I-440 to terminate CL with a direct merge on the inside just prior to S.</p>	<p><b>I-440 interchange</b> CL ramps are <u>elevated to the outside</u> on I-440 and are elevated over the S. Lyle Lane overpass and the bridge over Railroad (RR) &amp; Glenrose Ave</p>

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Reasonable Alternative #1	Reasonable Alternative #2
Lyle Lane overpass; overpass bridge replaced	terminating CL with a direct merge the outside of I-440
<b>I-24 mainline</b> between I-440 and E. Thompson Lane / Briley Pkwy interchange CL are <u>elevated to the outside</u> of mainline	<b>I-24 mainline</b> between I-440 and E. Thompson Lane / Briley Pkwy interchange are <u>elevated to the outside</u> of mainline
<b>I-24 interchange @ E. Thompson / Briley</b> Parkway interchange is a <u>new CL exclusive diamond interchange</u> at existing East Thompson overpass; CLs are elevated over Briley Parkway; includes a direct merge just South of Briley Pkwy in the median	<b>I-24 interchange @ Briley</b> Parkway interchange is modified to provide Choice Lane access ramps within the existing interchange using a <u>CL plaza style interchange</u> ; also includes a new directional GP flyover ramp
<b>I-24 mainline</b> between Briley Parkway and the RR bridge just South of Antioch Pike are <u>elevated to the outside</u> ; The CLs transition to the median at grade just North of the Harding Place interchange	<b>I-24 mainline</b> between Briley Parkway and Harding Place interchange CL are <u>elevated to the outside</u> of mainline. No CL access at Harding Place interchange
<b>I-24 mainline</b> between Harding Place and Haywood Lane interchange are <u>at grade in the median</u>	<b>I-24 mainline</b> between Harding Place and Haywood Lane interchange are initially elevated over Harding and transitions to <u>at grade in the median</u> just South of the interchange
<b>I-24 interchange @ Haywood</b> Lane interchange is modified to provide CL access using a <u>CL plaza style interchange</u> ; includes modifying the existing general purpose (GP) interchange from a Partial Cloverleaf to a Diamond interchange	<i>Alternative 2 is the same as Alternative 1</i>
<b>I-24 mainline</b> between Haywood Lane and Bell Road are initially <u>at grade in the median</u> , but transition to <u>elevated on the outside</u> approximately 1-mile South of Haywood Lane	<b>I-24 mainline</b> between Haywood Lane and Bell Road interchange are <u>at grade in the median</u> ; includes replacement of the bridge over Mill Creek and raising the mainline grade to address flooding issues

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Reasonable Alternative #1	Reasonable Alternative #2
<p><b>I-24 interchange @ Bell Road</b> interchange is modified to provide CL access using new <u>CL direct connection ramps</u> that provide connection over the RR to the Proposed Transit Center at Mall; no modification to existing GP Diamond interchange</p>	<p><b>I-24 interchange @ Bell Road</b> interchange is modified to provide CL access using a <u>CL plaza style interchange</u>; also includes modifying the existing GP ramps and replacing the adjacent RR bridge over Bell Rd to address operational issues</p>
<p><b>I-24 mainline</b> between Bell Road and Hickory Hollow Pkwy (HHP) are <u>elevated on the outside</u> initially and then transition to <u>at grade in the median</u> just prior to the HHP bridge</p>	<p><b>I-24 mainline</b> between Bell Road and Hickory Hollow Pkwy (HHP) are <u>at grade in the median</u></p>
<p><b>I-24 mainline</b> between HHP and Old Hickory Blvd (OHB) are <u>at grade in the median</u>; no CL access at the OHB interchange but includes a direct merge just South of the Old Franklin Road overpass</p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>
<p><b>I-24 mainline</b> between OHB and Waldron Road are <u>at grade in the median</u></p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>
<p><b>I-24 interchange @ Waldron Road</b> interchange is modified to provide CL access using a <u>CL plaza style interchange</u>; includes removing the existing loop ramp to convert to a GP Diamond interchange</p>	<p><b>I-24 interchange @ Waldron Road</b> interchange is modified to accommodate CL under the bridge; includes modifying the existing GP loop ramp and westbound exit ramp</p>
<p><b>I-24 mainline</b> between Waldron Road and Sam Ridley Pkwy (SRP) are <u>at grade in the median</u></p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>
<p><b>I-24 interchange @ Sam Ridley Pkwy</b> interchange is modified to provide CL access using a <u>CL plaza style interchange</u>; includes removing the existing loop ramp to convert to a GP Diamond interchange</p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>

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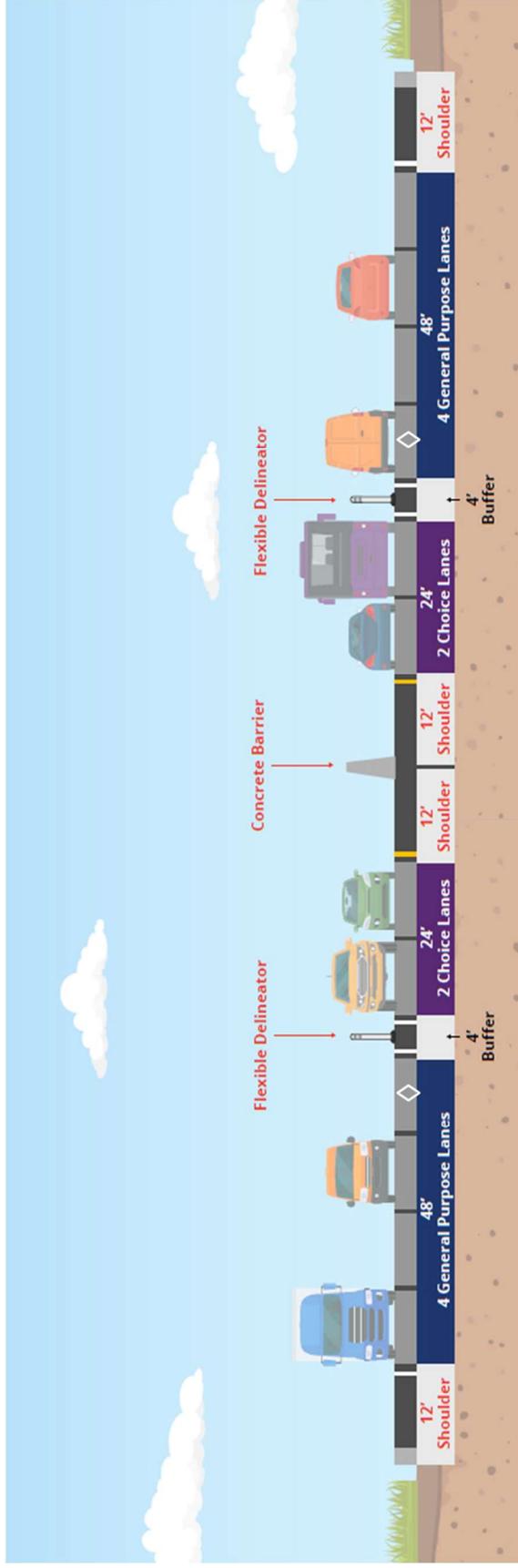
Reasonable Alternative #1	Reasonable Alternative #2
<p><b>I-24 mainline</b> between Sam Ridley Pkwy and Almadale Road are <u>at grade in the median</u></p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>
<p><b>I-24 interchange @ Almadale</b> Road interchange is preserved for future plans to construct a Diverging Diamond Interchange (not included in this project); no CL access planned directly at the interchange, but a direct merge will be included just West of the interchange</p>	<p><b>I-24 interchange @ Almadale</b> Road interchange is modified to provide CL access using a <u>CL plaza style interchange</u> for eastbound exit and westbound entry only</p>
<p><b>I-24 mainline</b> between Almadale Road and I-840 are <u>at grade in the median</u> and terminate approximately 2 miles before the I-840 interchange ramps</p>	<p><i>Alternative 2 is the same as Alternative 1</i></p>

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## 7.6. Proposed Roadway Typical Sections

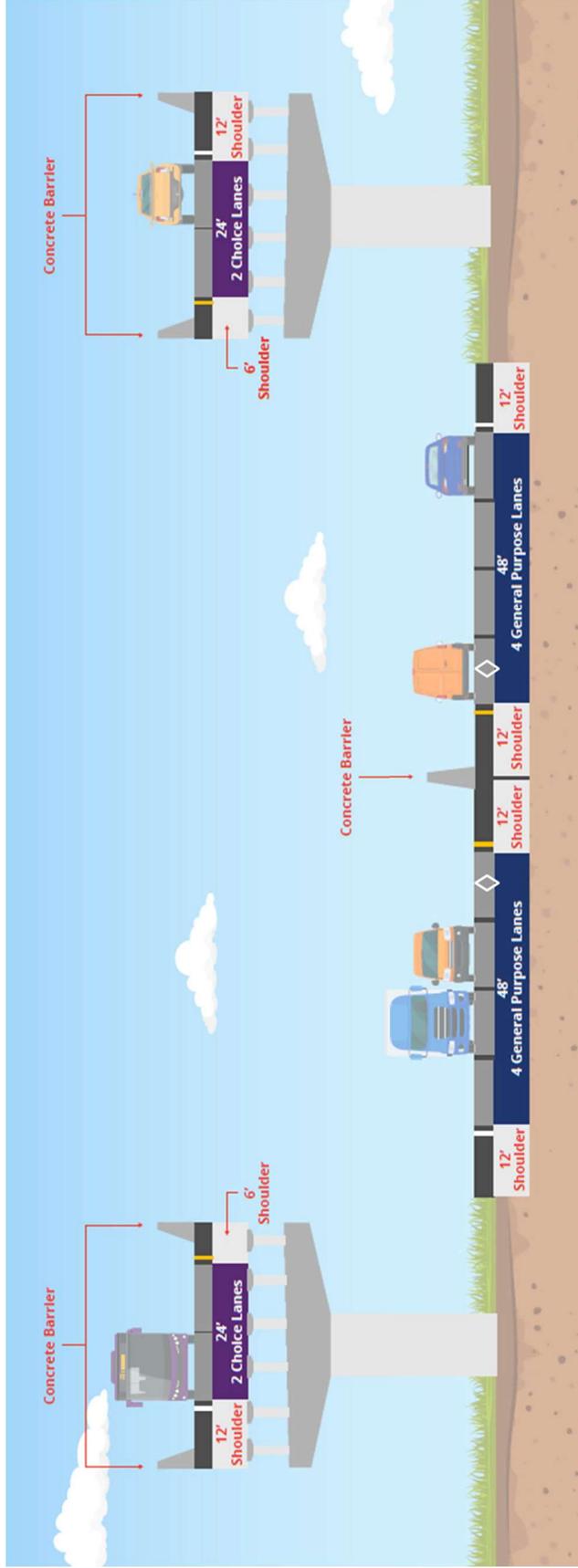
Both Reasonable Build Alternatives include widening to the inside of the existing mainline and widening to the outside of the existing mainline on elevated structures. **Figure 7-1** and **Figure 7-2** depict the general typical sections along the proposed Project alignments. The Reasonable Build Alternative Exhibits on the Project website show the proposed typical sections and depict changes along each proposed Build Alternative.

**Figure 7-1: Proposed Roadway Typical Section for Widening to the Inside of the Existing Mainline**



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





## 8. AGENCY FIELD REVIEWS

No agency field reviews have been conducted prior to CP2. As we advance to the next stage of development of the Draft EA, field review with resource agencies is recommended for the potential adversely impacted resources.

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## 9. PUBLIC INVOLVEMENT

In the initial planning stages of the proposed Project, TDOT conducted a public survey in addition to outreach efforts to initiate engagement with the proposed Project stakeholders and the public. An initial Choice Lanes traffic and revenue survey went out to residents within the Nashville region by postcard and social media in the month of March 2024 to gather feedback on the community's sentiments regarding Choice Lanes. This survey collected data on users' travel patterns including the days of the week and times they travel on the corridor, vehicle occupancy, trip purpose, origin and destination, delays experienced, remote work frequency, familiarity with Choice Lanes and a series of questions to determine under what conditions (user fee and time savings) would they choose to utilize Choice Lanes for their trip. **Figure 9-1** summarizes the findings of that survey with 1,852 public responses showing the level of support for Choice Lanes. **Table 9-1** identifies the key themes and topics shared during the survey.

On August 14, 2024, the I-24 Southeast Choice Lanes Public Information Meeting will kick off with a virtual meeting. A virtual meeting room will be available on-demand during the month-long event. In addition to the virtual meeting option, three in-person public meeting opportunities were held along the corridor on August 21, 28 and 29. At these public information meetings the public were offered the opportunity to learn more about the following:

1. NEPA process
2. Alternatives Screening
3. Noise & Visual Impacts Assessments Processes
4. Participate in a Visual Preferences Survey
5. Benefits to Transit in Choice Lanes
6. Review Project Design Concepts & Typical Sections
7. Review the Potential Choice Lanes Access Points
8. TDOT's Right of Way Process

At these meetings, the public were able to talk with Project Team members and share their feedback about the proposed Project and be a part of the decision-making process.

Figure 9-1: Choice Lane Preferences Survey Results

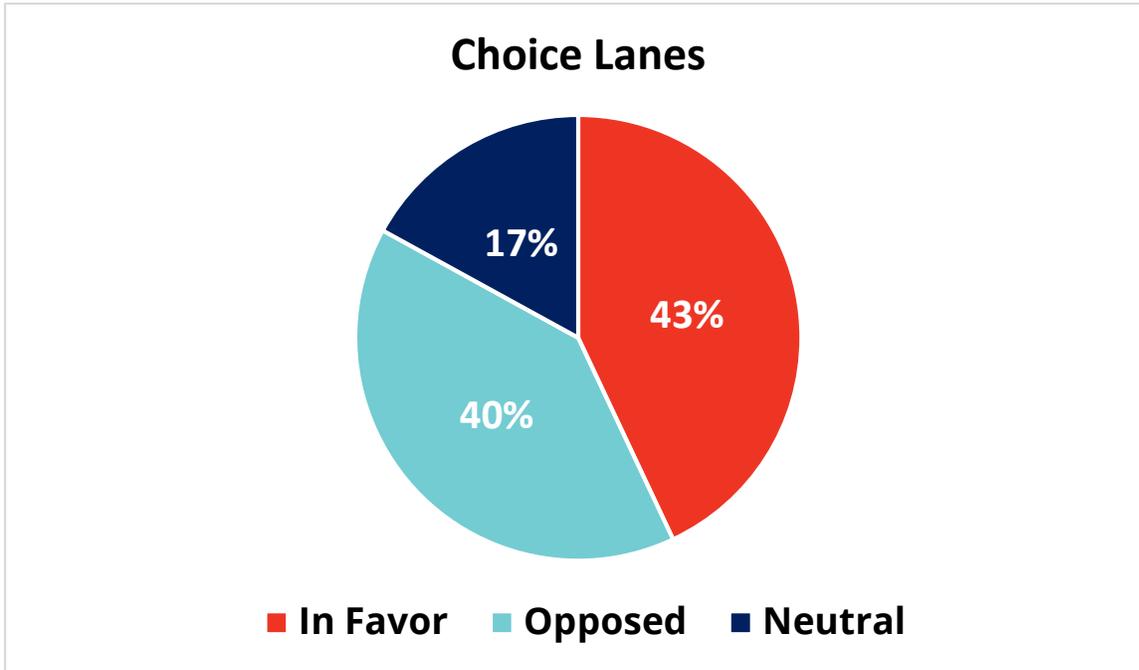


Table 9-1: Choice Lane Survey Results

Stance	Common Themes				
<b>Opposed</b>	User fees	Equity concerns	Funding highway projects	High fees	Prefer public transit investments
<b>In Favor</b>	Faster, reliable travel times	Less congestion	Reduced emissions	Improved air quality	Safer road conditions

Source: TDOT Team, Nashville Level 2 Traffic and Revenue Study, 2024.

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## 10. EVALUATION OF PROJECT ALTERNATIVES

In early 2024, the Project Team conducted environmental field studies, field surveys and traffic counts on the Project corridor. The initial range of Preliminary Alternatives have been evaluated using the technical data collected earlier this year which has not yet been confirmed by TDOT or other agencies and thus is subject to change. Environmental resources and constraints and existing conditions on the corridor have been evaluated and considered during this screening process. The preliminary ecological boundaries report findings were utilized in the calculation of stream and wetland impacts but the findings have not yet been verified by TDOT and USACE. The preliminary estimate of anticipated impacts with each Reasonable Build Alternative are presented in **Table 10-1**.

Additional detailed alternatives analysis will be conducted for these Reasonable Build Alternatives being carried forward into the EA.

**Table 10-1: Preliminary Estimate of Impacts for the Reasonable Build Alternatives**

Resource	Alternative #1	Alternative #2
<b>Right of Way Required</b>	25.8 acres	44.8 acres
<b>Right of Way Relocations</b>	25	42
<b>Environmental Justice</b>	Yes	Yes
<b>Historic Properties (not verified by TDOT or TN-SHPO)</b>	<b><u>2 Potentially Eligible Sites:</u></b> Glencliff UMC Rogers Manufacturing	<b><u>3 Potentially Eligible Sites:</u></b> Glencliff UMC PIAS Credit Union Rogers Manufacturing
<b>Section 4(f)</b>	TBD	TBD
<b>Section 6(f)</b>	None	None
<b>Hazardous Waste Sites</b>	TBD	TBD
<b>Floodplains</b>	TBD	TBD
<b>T &amp; E Species</b>	No significant adverse effects anticipated	No significant adverse effects anticipated

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Resource	Alternative #1	Alternative #2
<b>Wetland Impacts</b>	4.4 acres	6.7 acres
<b>Stream Impacts</b>	Exact Impacts TBD	Exact Impacts TBD but impacts are potentially 40% higher with this alternative as compared to Alternative 1
<b>303(d) Listed Streams</b>	No	No

*\*Preliminary data is based on consultant findings. TDOT has not verified or concurred with any recommendations. \**

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## 11. RECOMMENDATIONS

The preliminary screening of alternatives is presented in this report outlining the methodology and approach that was followed to develop and screen the preliminary Choice Lanes concepts. Through traffic analysis and an evaluation of physical and environmental constraints, the alternatives have been screened to identify two Reasonable Build Alternatives that meet the purpose and need of the proposed Project.

TDOT proposes to carry forward two proposed Build Alternatives and the No-Build Alternative for detailed evaluation in the EA, referenced as Build Alternatives #1 and #2 in this package.

The following technical studies and documentation will be prepared\*:

1. Air Quality & Greenhouse Gas
2. Conceptual Stage Relocation Plan
3. Historic Preservation
4. Archaeology
5. Ecology
6. Biological Assessment
7. Floodplains
8. Socioeconomic Conditions
9. Land Use & Community Facilities
10. Section 4(f) & 6(f)
11. Hazardous Materials
12. Noise Impacts
13. Visual Impacts
14. Traffic
15. Environmental Justice
16. Community Impacts

\*If preliminary impact calculations of some of the technical studies and public comment indicate a preferred build alternative, TDOT will not complete detailed technical studies and documentation for both build alternatives. The justification for eliminating one of the two build alternatives will be documented in the EA.



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## 12. NEXT STEPS

Following the conclusion of CP2, TDOT will finalize the environmental technical studies and will move forward with preparation of the Preliminary Draft EA, which is TESA Concurrence Point 3 for the No-Build Alternative, Build Alternative 1 and Build Alternative 2.

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**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION  
ENVIRONMENTAL DIVISION**

**ENVIRONMENTAL QUALITY AND NEPA SECTION**

SUITE 900, JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1402  
(615) 741-3655

**BUTCH ELEY**  
DEPUTY GOVERNOR &  
COMMISSIONER OF TRANSPORTATION

**BILL LEE**  
GOVERNOR

April 1, 2025

RE: Tennessee Environmental Streamlining Agreement Concurrence Signature Form  
Concurrence Point 3: Preliminary Draft Environmental Document and Preliminary Mitigation  
I-24 Choice Lanes Project, Davidson and Rutherford Counties, Tennessee  
PIN 134727.01

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the I-24 Choice Lanes Project in Davidson and Rutherford Counties, Tennessee. This EA is being developed by TDOT to document the impacts of the subject project in accordance with the *National Environmental Policy Act (NEPA)* and the *Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects (TESA)*. In accordance with TESA, we are requesting your review and concurrence on Concurrence Point 3 (CP3), Preliminary Draft Environmental Document and Preliminary Mitigation.

The CP3 document was sent to you on April 1, 2025, for a 30-day review period. Once you have had the opportunity to review the document, please sign this form. In signing this document, you are indicating your concurrence on the sufficiency of the environmental review and proposed mitigation efforts identified regarding resources over which you or your agency has jurisdiction.

Please sign and return this form to Dr. Tammy Allison Sellers at the address below by May 1, 2025. TDOT will issue a reminder to all agencies at least 14 calendar days prior to the requested return date. TDOT will assume concurrence from all TESA Participating Agencies that do not respond by May 1, 2025. Due to the schedule for the proposed project, extensions of the review period will not be granted.

Dr. Tammy Allison Sellers  
TDOT Environmental Division, Environmental Quality and NEPA Section  
505 Deaderick Street, Suite 900 James K Polk Building  
Nashville, TN 37243-0334  
Tammy.Sellers@tn.gov

If you feel all provisions of TESA CP3 have been satisfied, please acknowledge your agency's concurrence with the alternatives to be evaluated with your signature below.

TESA Agency: U.S. Army Corps of Engineers, Nashville District

TESA Contact: Travis Wiley, Transportation Program Manager, Regulatory Division  
(Print Name) (Title)

Concur: Travis Wiley  
(Signature)



**DEPARTMENT OF THE ARMY**  
NASHVILLE DISTRICT, CORPS OF ENGINEERS  
REGULATORY DIVISION  
3701 BELL ROAD  
NASHVILLE, TENNESSEE 37214

May 1, 2025

SUBJECT: LRN-2024-00561; TDOT PIN 134727.01; Interstate 24 (I-24) Choice Lanes Project, Agency Concurrence for TESA Concurrence Point 3

ATTN: Ms. Tammy Sellers  
Tennessee Department of Transportation  
505 Deaderick St, Suite 900, J.K. Polk Building  
Nashville, TN 37243

Dear Ms. Sellers,

This letter is in response to your request for agency comments as part of Concurrence Point 3 (CP3), addressing the *Environmental Assessment, I-24 Southeast Choice Lanes* (EA), for Interstate 24 Choice Lanes project from the system-to-system interchange of I-24 and I-40 in Davidson County, Tennessee to the interchange of I-24 and I-840 in Rutherford County, Tennessee. This project has been assigned File Number LRN-2024-00561. Please refer to this number in all communication concerning this matter.

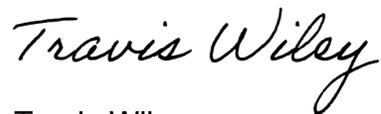
The U.S. Army Corps of Engineers, Nashville District (USACE) has reviewed the EA has made a determination of concurrence. USACE appreciates the efforts applied to the analyzing project alternatives in Section 2 and Appendix E which identified project screening criteria, listed how alternatives did or did not meet those criteria at each level of the screening process and included quantities where applicable. USACE has two recommended edits/additions to the EA.

1. Table 2.1 (Level 3 Screening Results) and Table 3.1 (Summary of Direct Resource Impacts): The categories of environmental effects are consistent between the Level 3 alternatives screening table (Table 2.1) and the listing of direct resource impacts for the recommended preferred alternative (Build Alternative) allowing reviewers to discern avoidance and minimization of impacts to environmental resources through design of the Build Alternative. One exception noted is the Right of Way/Land Use category. Table 2.1 lists 25.8 acres of land acquisition for right of way over 111 parcels whereas Table 3.1 lists 29.6 acres to be converted for transportation use but does not list the number of parcels acquired. Narrative in Section 3.1.1 suggests the Build Alternative would increase the acreage acquired for right of way from 25.8 to 29.6 but USACE recommends naming the categories in these tables to be consistent and adding a subcategory in Table 3.1 to identify the number of parcels to be acquired under the Build Alternative

2. Section 5.1 (Environmental Commitments), Table C: Item C-1 of the Necessary Permits, Buffer Variances and Mitigation Credits table lists a required authorization from USACE as “Individual Permit” and states “TDOT would apply for an Individual Permit under Section 404 [Clean Water Act] through the Nashville District”. USACE recommends modifying this language to change “Individual Permit” to “Department of the Army Authorization” since the project could potentially meet the criteria for a Nationwide Permit.

We appreciate your consideration of our comments and look forward to collaborating on this project. If you have any questions, please contact me by telephone at 865-393-0971, or via email at [travis.a.wiley@usace.army.mil](mailto:travis.a.wiley@usace.army.mil)

Sincerely,



Travis Wiley  
Transportation Manager  
Technical Services Branch  
Regulatory Division

Attachments

1. CP3 Concurrence Form