



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

M- -E- -M- -O- -R- -A- -N- -D- -U- -M

DATE: March 24, 2008

FROM:

Charles E. Bush
Transportation Manager II
NEPA Documentation Office

TO:

Mr. Larry Watson
Branch Chief
U.S. Army Corps of Engineers
Memphis District

Mr. Lee Barclay
Field Supervisor
U.S. Fish and Wildlife Service
U.S. Department of the Interior

Mr. Robert Todd
NEPA Contact
Tennessee Wildlife Resources Agency

Mr. Benjamin West
U.S. Environmental Protection Agency,
Region 4
NEPA Program Office

Ms. Martha Lott
Administrator/Coordinator
Memphis MPO

Ms. Saya Qualls
Chief Engineer
Tennessee Department of Environment
and Conservation

SUBJECT: Tennessee Environmental Streamlining Agreement – Concurrence Point 1
Interstate 40 Interchange at State Route 196 (Hickory Withe Road)
Environmental Assessment, Fayette County, Tennessee. Pin 1005597.00

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CP-1 SR196@I40 Pin 1005597.00 PA
March 24, 2008

In accordance with the spirit and intent of the *Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects (TESA)*, the Tennessee Department of Transportation (TDOT) is providing you information that describes the preliminary Purpose and Need Statement and a description of the Proposed Study Area for the Environmental Assessment being prepared for the proposed Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee (henceforth referred to as the I-40 Interchange). This information is considered the Concurrence Point 1 package. We did not include the project Coordination Plan with this package because your office should have received it with the recent Initial Coordination package sent March 10, 2008.

Please review the enclosed information and provide any comments you may have. If you concur with the information provided, please sign the Concurrence Point 1 signature form included at the end of the attached document and return it to the appropriate address shown on the form. You may also send your signed form to the e-mail address included on the form. If you do not concur with this information please provide us with your reasoning for nonconcurrence in a timely manner so we can address those comments as soon as possible.

If you have any questions concerning the information provided, please feel free to contact TDOT. Please respond within the agreed upon 45-day review period. The primary point of contact for this project is Mr. Joe Matlock, Transportation Planner, Region IV, TDOT Environmental Division, at 615-741-5365 or E-mail at Joe.Matlock@state.tn.us.

Sincerely:



Charles E. Bush
Transportation Manager II

PURPOSE AND NEED (CONCURRENCE POINT 1)

INTERSTATE 40 INTERCHANGE AT STATE ROUTE 196 (HICKORY WITHE ROAD) IN FAYETTE COUNTY, TENNESSEE

Project Status and Study Area

The Tennessee Department of Transportation (TDOT) proposes to construct a new interchange where State Route (SR) 196 (Hickory Withe Road) crosses over Interstate 40 (I-40) in Fayette County, Tennessee. An Environmental Assessment (EA) is being prepared for this project.

The proposed project is located in a rural area of Fayette County where SR-196 currently crosses over I-40. Construction of this project would make this the first Fayette County access point east of the Memphis Area. The adjacent interchange to the east is at SR-59 at a distance of approximately five miles. The adjacent interchange to the west is at New Airline Road in Shelby County at a distance of two miles.

The closest urban development, the City of Arlington, is located 4.5 miles northwest of the proposed project. A small community, the City of Gallaway, is located 2.0 miles north of the proposed interchange location, and Gallaway has annexed the area north of I-40 at the proposed I-40/SR-196 Interchange. The provision of an interchange at this location would allow access to I-40 from areas along both SR 15/US-64 and SR-1/ US-70/ US-79. This interchange would provide direct interstate access to Gallaway and an additional route to Arlington and Somerville. Figure 1 shows the project vicinity in relation to Memphis and the surrounding communities.

The entire area surrounding the proposed interchange is contained within the Fayette County Planned Growth Area. State Route 196 from Gallaway to Piperton is also located within the planning area of the Memphis Metropolitan Planning Organization (MPO). The proposed interchange project is consistent with the MPO's 2026 Long

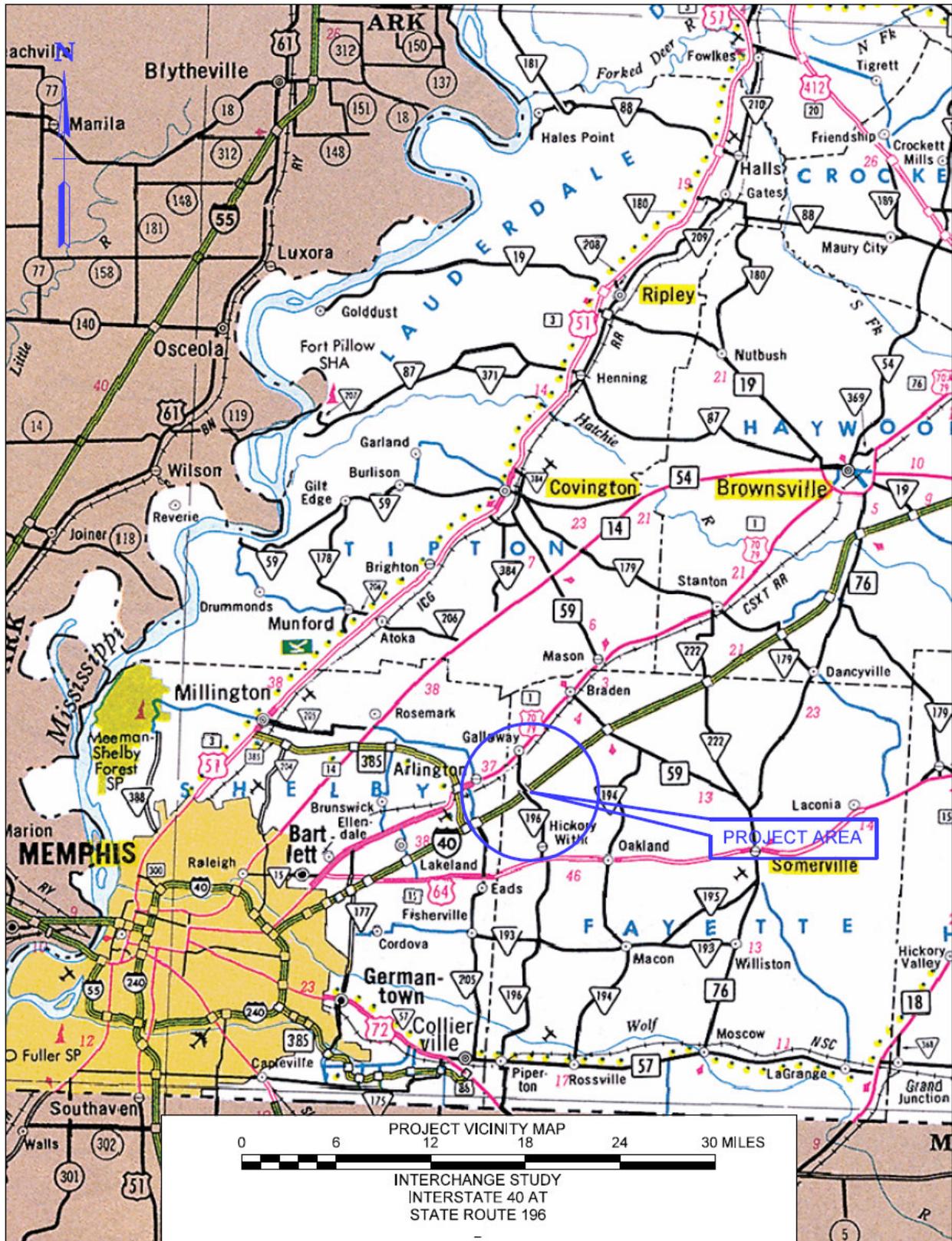
Range Transportation Plan (LRTP). In addition, the project was included in the FY 2008-2011 Transportation Improvement Program (TIP).

The primary study area for many of the resources anticipated to be impacted by this project will include a 500-foot radius surrounding the centerlines of the existing segments of I-40 and SR-196 within the proposed project construction limits, and surrounding the overall footprint of the proposed interchange ramps. For certain resources, a larger area surrounding the proposed interchange will be studied. For instance, impacts to social and economic environments will likely be studied at the county level.

The size of the study area for the indirect and cumulative impacts analyses will also extend beyond 500-feet of the immediate footprint of the project. The size of the study area for indirect and cumulative impacts will vary by resource category depending on the resources identified in the project vicinity that may potentially be impacted. The types of secondary developments anticipated to be promoted by the new interchange will be considered when determining the appropriate study area for indirect impacts. The anticipated extent of potential impacts associated with other past, present, or reasonably foreseeable projects that may be identified in the general project vicinity, which could contribute to cumulative impacts in combination with those impacts associated with the new interchange, will be considered when determining the appropriate study area for cumulative impacts.

The study area for indirect impacts will include areas most likely to be impacted by secondary developments promoted by construction of the new interchange, such as highway-oriented commercial/retail developments like gas stations, hotels, and fast-food restaurants. This would likely include areas immediately adjacent to the existing SR-196 within a currently undetermined distance from I-40.

Figure 1. Vicinity Map for Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee.



Project Purpose and Need

The primary purpose of the proposed I-40/ SR-196 Interchange is to provide safe and adequate transportation facilities for traffic projected to be generated by residential and commercial development that is anticipated as a result of the project area being identified in the Fayette County Growth Plan, as a “Fayette County Planned Growth Area.” The Fayette County Growth Plan was adopted in August 2003.

This project has been undertaken in accordance with the Federal Highway Administration’s (FHWA) policy for granting new or modified interstate access. An Interchange Justification Study (IJS) was conducted for this project and received operational approval from the FHWA on January 4, 2005. The IJS is a structured report on existing and anticipated traffic flow conditions that demonstrates that ramp merging and diverging associated with the proposed interchange will operate at acceptable levels of traffic service, that the proposed ramp junctions will not have any adverse effects on ramp operations at nearby interchanges, and that the ramp intersections on the crossroad may be adequately accommodated for the anticipated traffic demands.

System Linkage

Within the project area, I-40 currently consists of a rural four-lane, controlled access facility with a grass median and approximately 300 feet of right-of-way (ROW). SR-196 is currently a rural two-lane, non-access controlled road with a pavement width of 22 feet and approximately 60 feet of ROW.

The proposed project would include construction of a standard diamond interchange that permits future construction of loop ramps within all four quadrants. Orr Road, which currently intersects SR-196 immediately south of the interstate, would need to be relocated south of its present location to allow for the construction of the ramp in the southwest quadrant of the proposed interchange. The cross section on SR-196 will be three 12-foot lanes within the interchange: two 12-foot traveling lanes, a 12-foot continuous left-turn lane, and 10-foot shoulders. All interchange ramps would have

16-foot lanes and 6-foot shoulders. The realignment of Orr Road will be designed to meet minimum standards.

More details regarding the proposed interchange layout will be included in the Alternatives section of the EA. Figure 2 and Figure 3 show the general layout of the proposed new interchange.

Figure 2. Proposed Layout of the Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee.

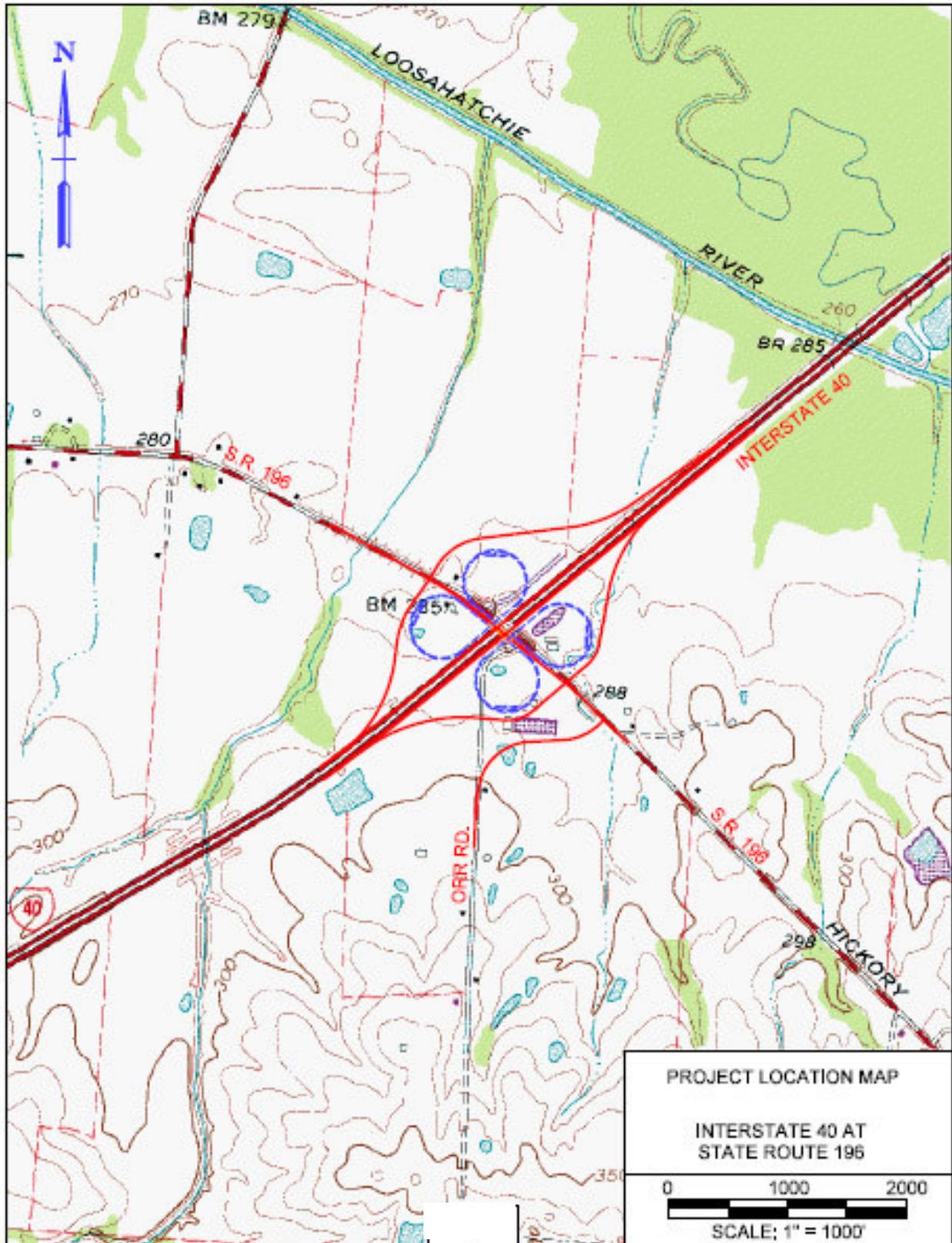
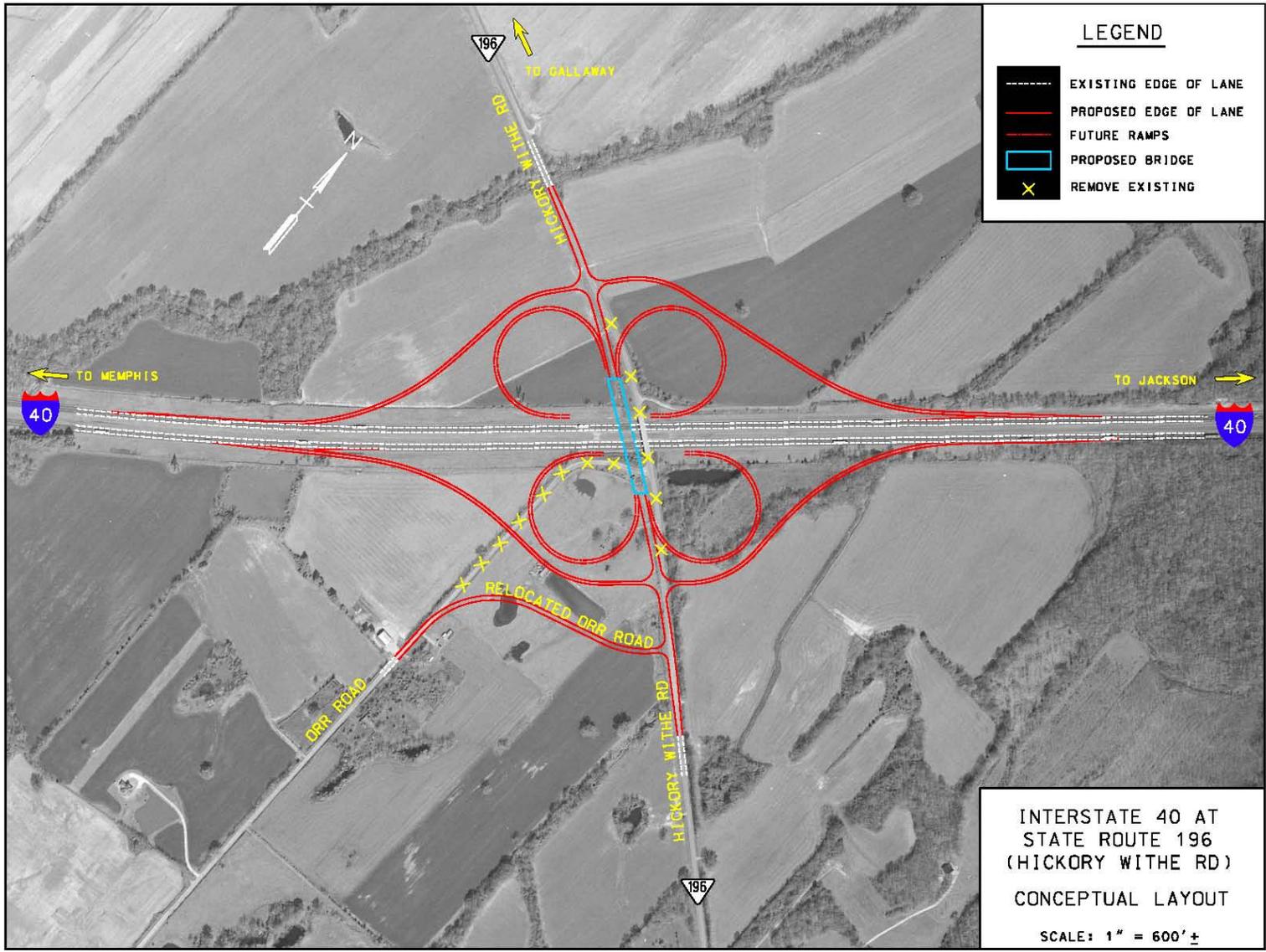


Figure 3. Proposed Layout of the Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee



Transportation Demand

The Fayette County Growth Plan was adopted in August 2003. The entire area surrounding the proposed interchange is contained within the Fayette County Planned Growth Area. State Route 196 from Gallaway to Piperton is also located within the planning area of the Memphis Metropolitan Planning Organization (MPO). This indicates that continued development is anticipated in the project area that would potentially result in increased traffic volumes being generated that would put additional demand on existing roadways in the area. The proposed interchange project is consistent with the MPO's 2026 Long Range Transportation Plan (LRTP). In addition, the project was included in the FY 2008-2011 Transportation Improvement Program (TIP).

Existing and Future Conditions

The existing SR-196 in the immediate project area consists of a rural two-lane, non-access controlled road with a pavement width of 22-feet and approximately 60 feet of ROW.

Local officials are anticipating residential growth along the SR-1/ US-70/ US-79 highway corridor through Gallaway and towards the east as the Memphis metropolitan area continues to grow. Commuters from this area primarily use I-40 to travel to jobs in urban and suburban Memphis areas. To do this, many of them travel through the City of Arlington. Commuters from areas near the east side of Arlington that are south of the CSX Railroad tracks use Forrest Street to Walker Road, and then turn onto Polk Road and then Douglass Road to travel through eastern Arlington. These are all two-lane collector roads. Douglass Road provides access to Airline Road, which is a four-lane undivided road that leads through the school zone for Arlington High School on its way to an interchange with I-40. Areas in the Gallaway areas north of the CSX RR use SR-1/ US-70/ US-79, which is a two-lane highway that becomes four-lane through Arlington, but does not have left-turn lanes and does have many driveways. The route to I-40 from SR-1/ US-70/ US-79 is to take SR-385, which is a modern freeway connection.

The interchange proposed for I-40 at SR-196 would provide access for several areas to reach I-40 without traveling through Arlington. This interchange would provide opportunities for development in mostly rural Fayette County, particularly in the areas around and east of Gallaway. The City of Gallaway has recently annexed southward to I-40 at the proposed I-40/SR-196 Interchange.

The I-40/ SR-196 Interchange is proposed to be a full diamond type interchange and would provide for all traffic movements. The proposed layout of the interchange would allow enough space for construction of loop ramps in all four quadrants of the interchange in the future. The recommended interchange design would meet or exceed all American Association of State Highway and Transportation Officials (AASHTO) criteria.

Traffic Analyses

Traffic investigations were performed using a process called Capacity Analysis, using methodologies established by the Transportation Research Board and approved by the FHWA. Findings are reported in terms of Levels of Service (LOS). Levels of Service describe the character of traffic flow for a particular roadway segment or intersection.

The levels are like school grades A through F where:

- LOS A = Primarily free flow operations;
- LOS B = Reasonably free flow operations;
- LOS C = Stable operation;
- LOS D = Congestion, approaching a range in which small increases in flow will cause substantial deterioration in services;
- LOS E = Extremely unstable operations; and
- LOS F = Forced flow or stop-and-go breakdown conditions.

As part of the IJS, Capacity Analyses were conducted to determine the relative performance of the proposed interchange in 2008 and in 2028, during the AM and PM peak periods.

Those analyses have recently been updated to reflect anticipated base year of 2010 and design year 2030 conditions. The findings of the updated analyses revealed that the LOS within the proposed interchange project area was no worse than LOS D (if signals are provided at the ramp intersections with SR-196) through the year 2030. This means that if constructed, the proposed interchange would be fully functional and would be capable of providing an important link in the regional transportation network and additional access point that would support the overall purpose and need described in this document.

Legislation

At this time, there is no local, state, or federal legislation that would affect the purpose and need for the proposed project.

Social or Economic Conditions

The fact that the land adjacent to the project site is located within a Fayette County Planned Growth Area as detailed in the Fayette County Growth Plan implies that future residential and commercial development would occur in the immediate area, if the interchange is constructed or not. It is most likely that development would first occur north of I-40 due to the relative ease of extending utilities from Arlington and Gallaway, and because Gallaway has recently annexed the area into its city limits.

Highway-oriented commercial development, to include service stations, fast food restaurants, truck stops, and motels, would most likely be the initial types of development if the interchange is constructed. Local officials are anticipating residential development to increase and have discussed the possibility of a shopping mall in the immediate surrounding area as well. Potential impacts anticipated to be associated with those developments would be discussed in the EA along with the impacts associated with construction and use of the interchange.

Land Use

Land use in the project area is primarily rural with cotton fields and a sod farm immediately adjacent to the proposed interchange site. The area contains scattered residential and commercial developments along SR-196 to the north and south of I-40. Construction of this interchange is not expected to require direct acquisition of any residences or other improvements. Acquisition of some acreage now being used for the agricultural operations would be necessary. More detailed studies would be conducted as part of the EA to determine potential impacts to the environment including natural, social, cultural, and economic resources.

Modal Relationships

The CSX Transportation railroad crosses SR-196 and bisects the City of Gallaway approximately 2.0 miles north of the proposed interchange. It is not anticipated that measurable intermodal benefits would be derived from the proposed project, because there are no existing intermodal facilities in the City of Gallaway. Potential safety and traffic flow impacts of the railroad crossing would be considered in the EA.

The Memphis Area Transit Authority system does not reach this far from the central metropolitan areas. The closest bus route is over ten miles away. The Long Range Transit Plan for the region shows a park-and-ride lot in Arlington, which is the closest TSM element in the Long Range Transportation Plan for the region.

Safety

Without the proposed interchange, much of the anticipated development in Fayette County would still likely occur in the general vicinity, but access to the land would be via secondary, less direct routes. The issues surrounding the proposed project location relate more to access issues than to safety concerns. However, as the anticipated growth occurs in the area and more traffic is generated, there is a possibility that safety issues could be identified as a secondary need for this project.

Roadway Deficiencies

This project is primarily being developed to deal with access issues and anticipated urban growth in the region rather than being due to roadway deficiencies on existing routes. However, the anticipated growth in the project vicinity may potentially result in some of the secondary routes becoming deficient in the reasonably foreseeable future as traffic volumes continue to increase.

Within the project area, I-40 currently consists of a rural four-lane, controlled access facility with a grass median and approximately 300 feet of right-of-way (ROW). There are no foreseeable deficiencies of I-40 within the immediate project area at this time. There is currently no interchange at the SR-196 crossing of I-40 and the roadway is capable of handling existing traffic.

Depending on the amount of growth that occurs, some anticipated access and traffic issues may conceivably be solved by implementing Traffic Systems Management (TSM) projects on the existing secondary routes. However, it is anticipated that providing the proposed additional access point to I-40 would be more of a long-term, proactive solution and would likely supersede the need for some of the other potential future TSM-related projects that would likely be needed without the new interchange.

It is possible other improvement projects to the local roadway system would be necessary even if the proposed interchange is constructed, but the need for some of those improvements could potentially be delayed until some point beyond the reasonably foreseeable future. Improvements to existing roadways in the immediate interchange footprint would occur as part of the project, such as widening of SR-196 to accommodate turning lanes for the ramp intersections and relocation of Orr Road. Improvements would also be made on I-40 to accommodate the exit and entrance ramps and merge lanes. Additional improvements could become necessary as the area continues to grow and as the new interchange becomes more heavily utilized. For instance, SR-196 may need further improvements beyond the immediate interchange footprint at some point in the future, such as widening the roadway.

**Tennessee Environmental Streamlining Agreement (TESA) Concurrence
Document for Concurrence Point 1**

**Purpose and Need and Study Area for the
Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee**

The Tennessee Department of Transportation has submitted for your review and concurrence summary information for the I-40 Interchange project including a preliminary Purpose and Need Statement and a description and mapping of the proposed Study Area. Once you have had a chance to review the enclosed documents, please sign this form to indicate your concurrence.

Return the signed form to Mr. Joe Matlock at the address below within 45 days of the date of this letter (**March 24, 2008**):

Mr. Joe Matlock
Transportation Planner, Region IV
NEPA Documentation Office
Environmental Division TDOT
Suite 900 - James K. Polk Building
505 Deaderick Street
Nashville, Tennessee 37243-0334

Joe.Matlock@state.tn.us

If you do not concur with the information provided or need additional time to review it, please contact Mr. Joe Matlock via writing prior to the end of the 45-day review period indicating your reasoning for nonconcurrence and/or your request for review time extension. As outlined in the TESA agreement TDOT will assume you concur with the information provided for your review if no response is received.

This agency feels all provisions of the Tennessee Environmental Streamlining Agreement for Concurrence Point 1 for the above project have been satisfied.

Agency: _____

Concurrence: _____
(Name and Title)

Date: _____

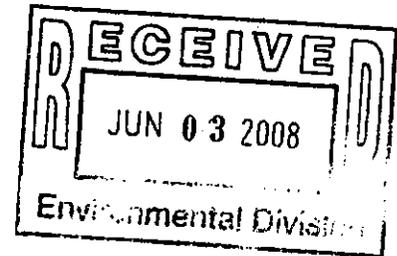


TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER
P. O. BOX 40747
NASHVILLE, TENNESSEE 37204

May 29, 2008

Joe Matlock
Transportation Planner, Region IV
NEPA Documentation Office
Environmental Division TDOT
Suite 900 – James K. Polk Building
505 Deaderick Street
Nashville, TN 37243-0334



Re: **Concurrence Point 1**, Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee

Dear Mr. Matlock:

The Tennessee Wildlife Resource Agency has received and reviewed the information your office provided to us regarding the proposed project listed above. Our current concerns are potential environmental impacts associated with potential stream and wetland impacts and potential impacts to rare species that may occur due to the construction of this project. We therefore request that all stream crossings and wetland crossings, with linear feet of stream impacts and acreages of wetland impacts, be illustrated and tabulated for each alternative proposed for consideration in future correspondence that will be forthcoming from your agency once alignments are proposed.

We concur on Concurrence Point 1 for the proposed construction of a new interchange where State Route 196 crosses over Interstate 40 in Fayette County, Tennessee. We have completed the requested concurrence form, which is attached. We thank you for the opportunity to participate during the coordination process and look forward to working with TDOT personnel in the future to reduce potential impacts to fish and wildlife resources associated with this project.

Sincerely,

Robert M. Todd

Robert M. Todd
Fish and Wildlife Environmentalist

cc: Steve Seymour, Region I Habitat Biologist
Jerry Strom, Region I Assistant Manager

The State of Tennessee

**Tennessee Environmental Streamlining Agreement (TESA) Concurrence
Document for Concurrence Point 1**

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Environmental Division TDOT
Suite 900 - James K. Polk Building
505 Deaderick Street
Nashville, Tennessee 37243-0334

Joe.Matlock@state.tn.us

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This agency feels all provisions of the Tennessee Environmental Streamlining Agreement for Concurrence Point 1 for the above project have been satisfied.

Agency: TENNESSEE WILDLIFE RESOURCES AGENCY

Concurrence: Robert M. Jodol, FISH AND WILDLIFE ENVIRONMENTALIST
(Name and Title)

Date: 5-29-2008

**Tennessee Environmental Streamlining Agreement (TESA) Concurrence
Document for Concurrence Point 1**

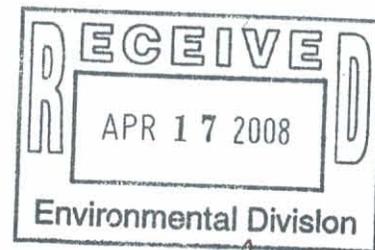
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NEPA Documentation Office
Environmental Division TDOT
Suite 900 - James K. Polk Building
505 Deaderick Street
Nashville, Tennessee 37243-0334

Joe.Matlock@state.tn.us



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This agency feels all provisions of the Tennessee Environmental Streamlining Agreement for Concurrence Point 1 for the above project have been satisfied.

Agency: U.S. Fish and Wildlife Service

Concurrence: Scott Barclay, Supervisor, Tennessee Field Office
(Name and Title)

Date: 16 April 2008

**Tennessee Environmental Streamlining Agreement (TESA) Concurrence
Document for Concurrence Point 1**

**Purpose and Need and Study Area for the
Interstate 40 Interchange at State Route 196 in Fayette County, Tennessee**

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Joe.Matlock@state.tn.us

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This agency feels all provisions of the Tennessee Environmental Streamlining Agreement for Concurrence Point 1 for the above project have been satisfied.

Agency: U.S. Environmental Protection Agency, Region 4

Concurrence: Ben West, Biologist
(Name and Title)

Date: 5/9/08



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

May 19, 2008

Mr. Ben West
Biologist
Office of Environmental Assessment
U.S. Environmental Protection Agency
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303

SUBJECT: Tennessee Environmental Streamlining Agreement – Concurrence Point 1 Interstate 40 Interchange at State Route 196 (Hickory Withe Road) Environmental Assessment, Fayette County, Tennessee.

Dear Mr. West:

In accordance with the spirit and intent of the Tennessee Environmental Streamlining Agreement for the Environmental and Regulatory Coordination of Transportation Projects (TESA), the Tennessee Department of Transportation (TDOT) is providing you with a response to your Advisory Comments included with your signed concurrence letter dated May 9, 2008. Your comments were based on your reviews of the information you were provided as part of the Concurrence Point 1 (Purpose and Need) package for the subject project.

Your Advisory Comments were as follows:

“The Loosahatchie River and other tributaries in Fayette County are listed by the Tennessee Department of Environment and Conservation (TDEC) as impaired by pollution (loss of biological integrity and physical substrate habitat alteration) and not fully meeting their designated uses. It is unclear if these waterbodies occur within the project study area for direct and indirect impacts. EPA encourages TDOT to consult with TDEC regarding the status of development of Total

Maximum Daily Loads (TMDLs) for these waterways and how the project could affect implementation of restoration efforts in this sub-watershed. EPA also encourages TDOT to develop alternatives that minimize impacts to these impaired aquatic resources, as appropriate.”

TDOT appreciates your submission of Advisory Comments for this project and intends to incorporate your concerns into the technical studies to be completed for the Environmental Assessment (EA). The Loosahatchie River and its tributaries are in the proposed study area for direct, indirect, and cumulative impact analyses that will be conducted for the EA. However, based on the conceptual layout of the proposed Build Alternative for the new I-40 interchange, TDOT does not expect there to be any measurable, long-term direct impacts to the Loosahatchie River due to this project.

At least one small tributary to the Loosahatchie River that flows through the proposed project area may be directly impacted by construction of the project. TDOT anticipates that impacts to water quality in that tributary can be minimized by incorporating proper design of culverts or any other structures deemed necessary where crossings would occur. Based on information available to date, the existing tributaries and sub-watershed of concern have been somewhat degraded due to existing land uses within the proposed project area including farming operations and past alterations associated with the existing I-40 and SR-196. It is not anticipated that the new interchange project would result in any substantial changes from baseline conditions. However, the upcoming technical studies will be used to determine the severity of impacts and to document existing condition of the streams and sub-watershed in general.

As suggested, TDOT has been, and will continue to be, in coordination with TDEC and the U.S. Army Corps of Engineers to ensure that all concerns regarding water quality and other impacted aquatic resources are considered thoroughly. TDEC has been sent a copy of this response letter and is thereby requested to inform TDOT of the status of development of TMDLs for the affected waterways and whether this project could affect implementation of any restoration efforts in the sub-watershed.

At this time, TDOT does not anticipate the need to develop an avoidance alternative for this project, because we believe the impacts to the Loosahatchie River watershed can be kept to a minimum. TDOT will continue to refine the steps that will be taken to reduce water quality impacts throughout the planning, design, and permit phases of the project. TDOT would incorporate proper construction techniques, including utilization of approved erosion control features and quick revegetation of the area following construction. TDOT will mitigate for impacts as deemed necessary through continued coordination and permitting efforts.

If you have any additional concerns, please feel free to contact TDOT. The primary point of contact for this project is Mr. Joe Matlock, Transportation Planner, Region IV, TDOT Environmental Division, at 615-741-5365 or E-mail at Joe.Matlock@state.tn.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Bush". The signature is written in a cursive style with a large initial "C".

Charles E. Bush
Transportation Manager II