

**APPENDIX E**

**ENVIRONMENTAL JUSTICE ANALYSIS**

**JUNE 2014**



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

**MEMORANDUM**

**Date:** June 10, 2014

**Project:** Pellissippi Parkway Extension (SR-162), Blount County, Tennessee

**Subject:** Updated Environmental Justice Analysis as Part of the Reevaluation of the Draft Environmental Impact Statement (DEIS)

The focus of this memorandum is to update the Environmental Justice analyses previously prepared for the DEIS alternatives (No-Build, A, C and D) and for the Preferred Alternative (DEIS Alternative A) avoidance options (West Shift and East Shift).

**Legislative and Regulatory Background**

Executive Order (EO) 12898 on Environmental Justice (issued February 11, 1994) requires that each federal agency, to the greatest extent permitted by law, administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid “disproportionately high and adverse” effects on minority and low-income populations. There are three basic principles of environmental justice:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

In 1997, the US Department of Transportation (USDOT) issued DOT Order 5610.2, *DOT Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, establishing procedures to be used by DOT agencies to comply with EO 12898. In 2012, the

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Department issued DOT Order 5610.2(a) to update and clarify its Environmental Justice procedures.

In December 1998, the FHWA issued Order 6640.23 *FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* to establish specific policies and procedures for the application of EO 12898 Environmental Justice principals to FHWA actions. The original FHWA Order was superseded in June 2012 by Order 6640.23A, *FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*.

## **Background**

The DEIS for the subject project evaluated the No-Build Alternative and three Build Alternatives (two four-lane alternatives – Alternatives A and C; and an improved two-lane alternative – Alternative D). TDOT held a Public Hearing on the DEIS in July 2010. Following consideration of the environmental evaluation and comments provided by the public and agencies, in May 2012 TDOT announced its selection of Alternative A as the Preferred Alternative for the project. Figure 1 shows the location of the DEIS alternatives and the Preferred Alternative.

To prepare the FEIS, TDOT updated several technical studies for the Preferred Alternative, including the Phase II archaeology for five sites identified as potentially eligible during the DEIS. As a result of these Phase II investigations, one site was determined eligible for the National Register of Historic Places. TDOT investigated ways to avoid or minimize adverse effect to the site, focusing on identifying potential avoidance options via minor alignment shifts in the vicinity of the sensitive portion of the eligible archaeology site, rather than major shifts of the alignment of the Preferred Alternative.

TDOT identified two potential shifts of the alignment to avoid impacts to the eligible archaeology site, both requiring additional archaeology, noise, ecology, geotechnical and Environmental Justice studies to determine if the potential shifts were prudent and feasible. The two minor alignment shifts (also referred to as “avoidance options”) are described below and illustrated in Figure 2.

- **East alignment shift** would shift the right-of-way (ROW) about 300 feet eastward in the vicinity of the Kensington Place Mobile Home Park (referred to in this memo as the mobile home community) near the southern terminus of the project.
- **West alignment shift** would shift the ROW about 150 feet to the west into the Kensington Place mobile home community.

Figure 1 – 2012 Preferred Alternative and DEIS Alternatives

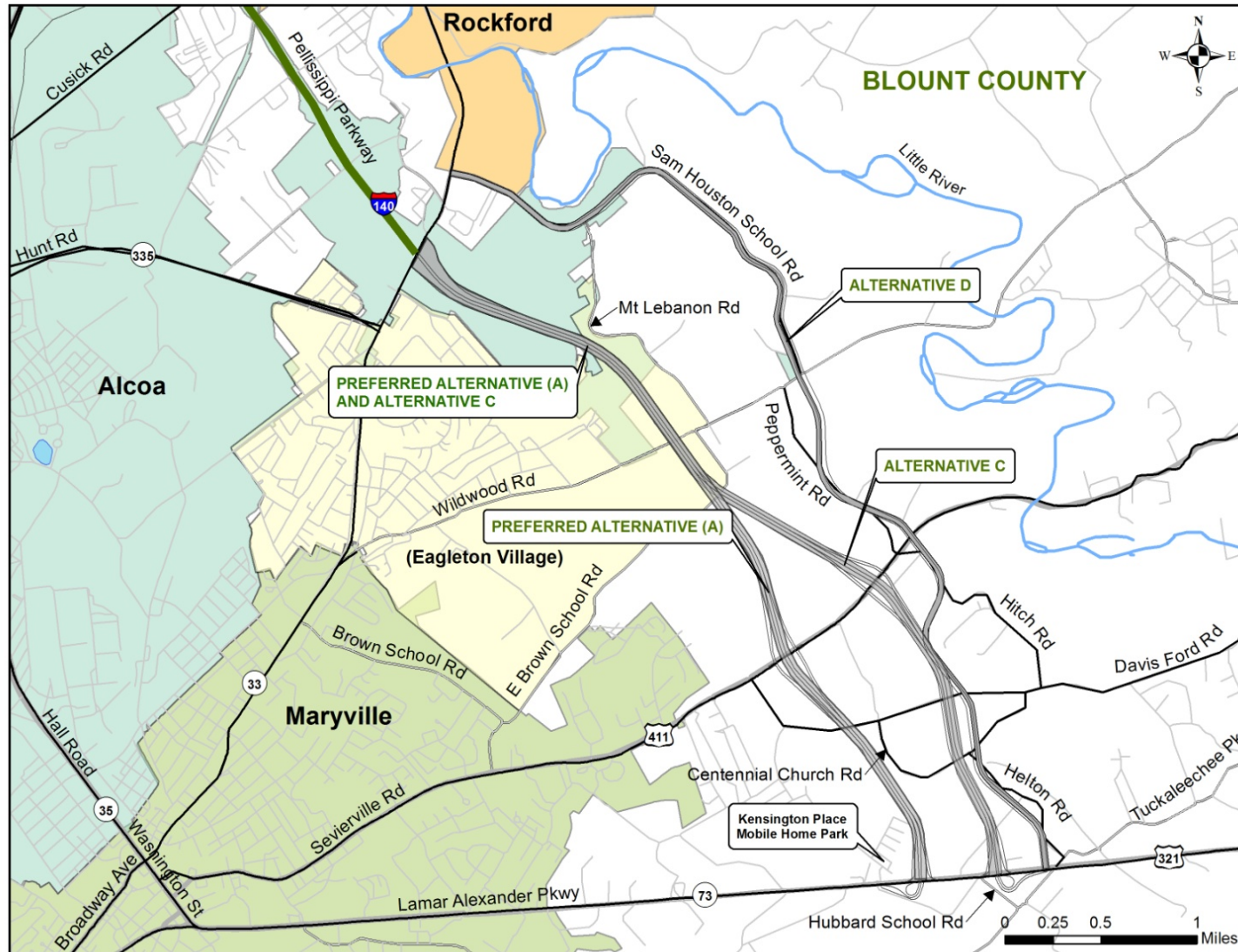
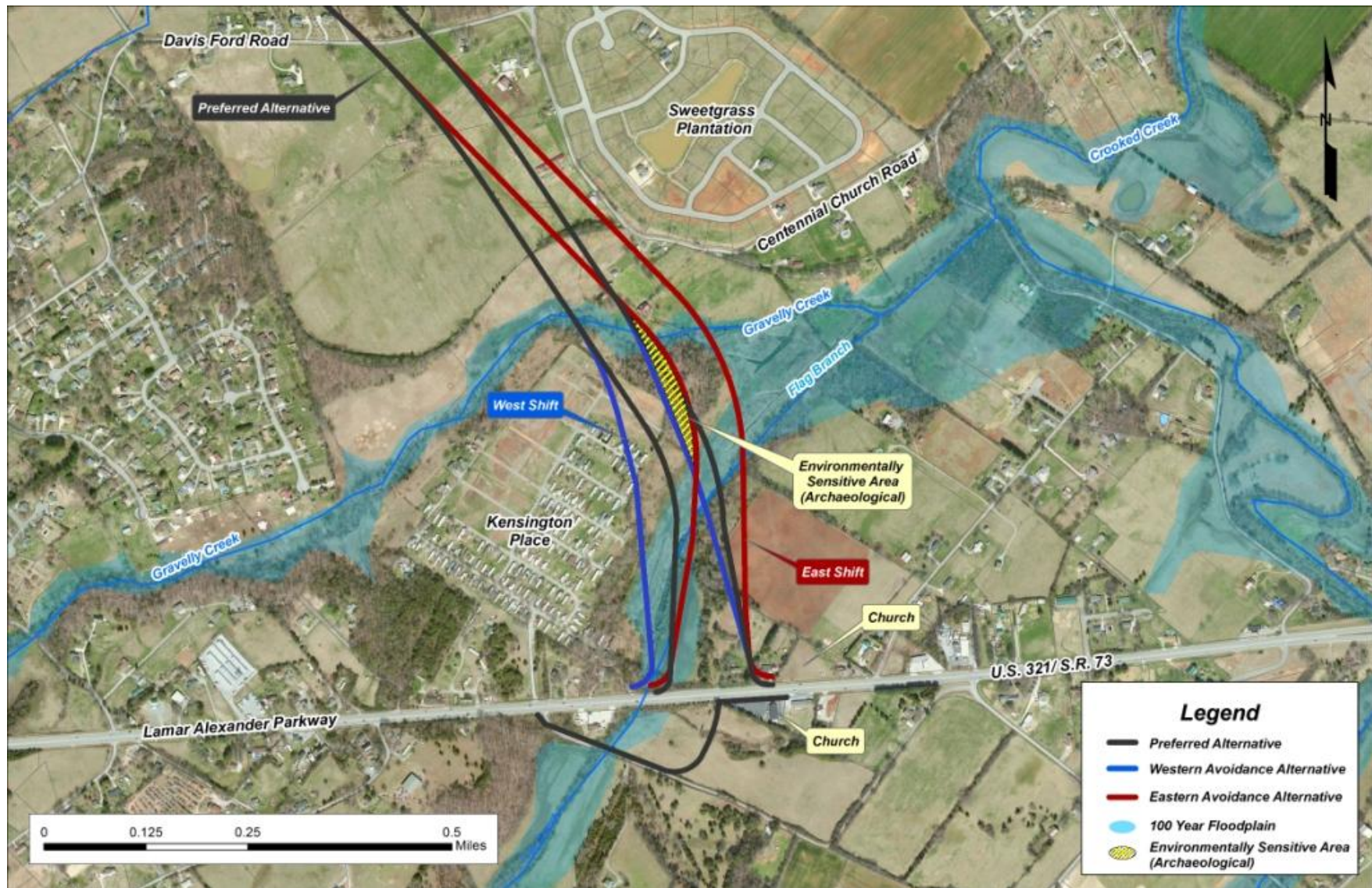




Figure 2 – 2012 Preferred Alternative and Avoidance Shifts



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TDOT held a community briefing on Thursday, May 30, 2013 to engage those persons and businesses potentially affected by the proposed minor alignment shifts.

TDOT prepared an Environmental Justice Analysis Memorandum, dated June 21, 2013, to assess whether there is a disproportionately high and adverse impact to the low-income and minority residents in the mobile home community that would be affected by the two minor alignment shifts. The analysis concluded that low-income and minority residents will experience adverse impacts, likely due to increased noise, changes in the views, and displacements. To minimize the predicted noise impacts to the community, TDOT committed to construction of a noise barrier for the community. TDOT also committed to seek input from community residents regarding the landscaping and color/pattern of the barrier in order to minimize possible visual impacts to the community as a result of the barrier and the new roadway.

Following careful review of the public input from the community briefing, and consideration of the amount and type of impacts of each shift and the potential to mitigate adverse effects, TDOT selected the west shift to modify the Preferred Alternative. TDOT made a public announcement that the Preferred Alternative had been modified by the west alignment shift with a media advisory issued on July 29, 2013.

Due to the time that has elapsed (more than three years) since the approval and circulation of the DEIS (May 2010), in July 2013 TDOT initiated a reevaluation of the DEIS to determine whether a supplement to the DEIS or a new DEIS is necessary prior to approval of the FEIS.

This updated Environmental Justice Analysis Memorandum evaluates the DEIS alternatives as well as the Preferred Alternative with West Shift and the considered and dismissed Preferred Alternative with East Shift. This memo:

- Identifies potential low-income and minority populations in the project area defined in the DEIS;
- Describes potential impacts to identified Environmental Justice communities as well as mitigation measures to minimize impacts to those communities;
- Describes coordination activities to achieve public participation and input from low-income and minority persons; and
- Addresses alternatives considered to avoid or minimize impacts to the protected populations.

### **Identification of Potential Environmental Justice Communities in the Project Area**

The legal and regulatory framework for Environmental Justice concerns focuses specifically on impacts to low-income populations and minority populations in the United States. Low-income persons are those whose median household income is at or below the Department of Health and Human Services poverty guidelines. Minority populations are specifically identified as persons who are:

1. Black: a person having origins in any of the black racial groups of Africa;
2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;

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3. Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent;
  4. American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or
  5. Native Hawaiian and Other Pacific Islander: a person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

To identify concentrations of low-income and/or minority populations that would be affected by any of the project alternatives, TDOT reviewed the most recently available US Census data (2010) and the most recent data from the American Community Survey (2012). The secondary data review was supplemented by visual inspections of the project area and interviews with local planners conducted during the DEIS evaluation.

Blount County's population as a whole is primarily white (92 percent). Hispanic persons constitute about 2.8 percent of the population and Black persons are about 2.7 percent of the population. About 11.7 percent of the county's population is considered low-income.

Based on the review of available data, visual reconnaissance and past conversations with area planners, there is one substantial concentration of low-income and minority populations in the project area; this concentration of protected populations is the Kensington Place mobile home community. This community is on the north side of US-321/SR-73, to the east of the Maryville city limits, at the southern end of the proposed project. This development, owned by the Kensington Place MHP, LLC, in Royal Oaks, Illinois, has 163 mobile home site pads with electric hook-ups. Over 70 percent of the site pads have a mobile home on the pad. Most of the mobile homes are occupied, and most are owner occupied, according to the mobile home park manager in a May 30, 2014 telephone conversation. Figure 3 illustrates the layout of the mobile home community.

The following sections present the data for low-income and minority persons in the project area. Also included in this analysis is information on Limited English Proficiency (LEP) populations; while LEP is not included as a protected category of persons covered by EO 12898, this information helps in understanding the ethnic composition of the minority communities, and in determining how best to communicate information about the project.



**Figure 3 - Kensington Place Mobile Home Community**



#### Low-Income Population

The 2010 Census of Population includes persons below the poverty level at the Census tract geography, but for reasons of privacy does not provide more detailed data at the block group or lower level. For a better idea of where low-income persons reside, this analysis uses information from the 2012 American Community Survey for the block group level. Table 1 and Figure 4 illustrate by block group the percent of persons living below the poverty level in the area of the DEIS and Preferred Alternatives.

The southern end of the project area (where the Kensington Place mobile home community is located) has the higher concentration of persons below the poverty level compared with the rest of the project area and Blount County. The Census Block Group (CT 110.01, BG 1), which encompasses the mobile home community, has a substantially higher percentage of population below the poverty level (27.7 percent) compared with the county and most of the other block groups.



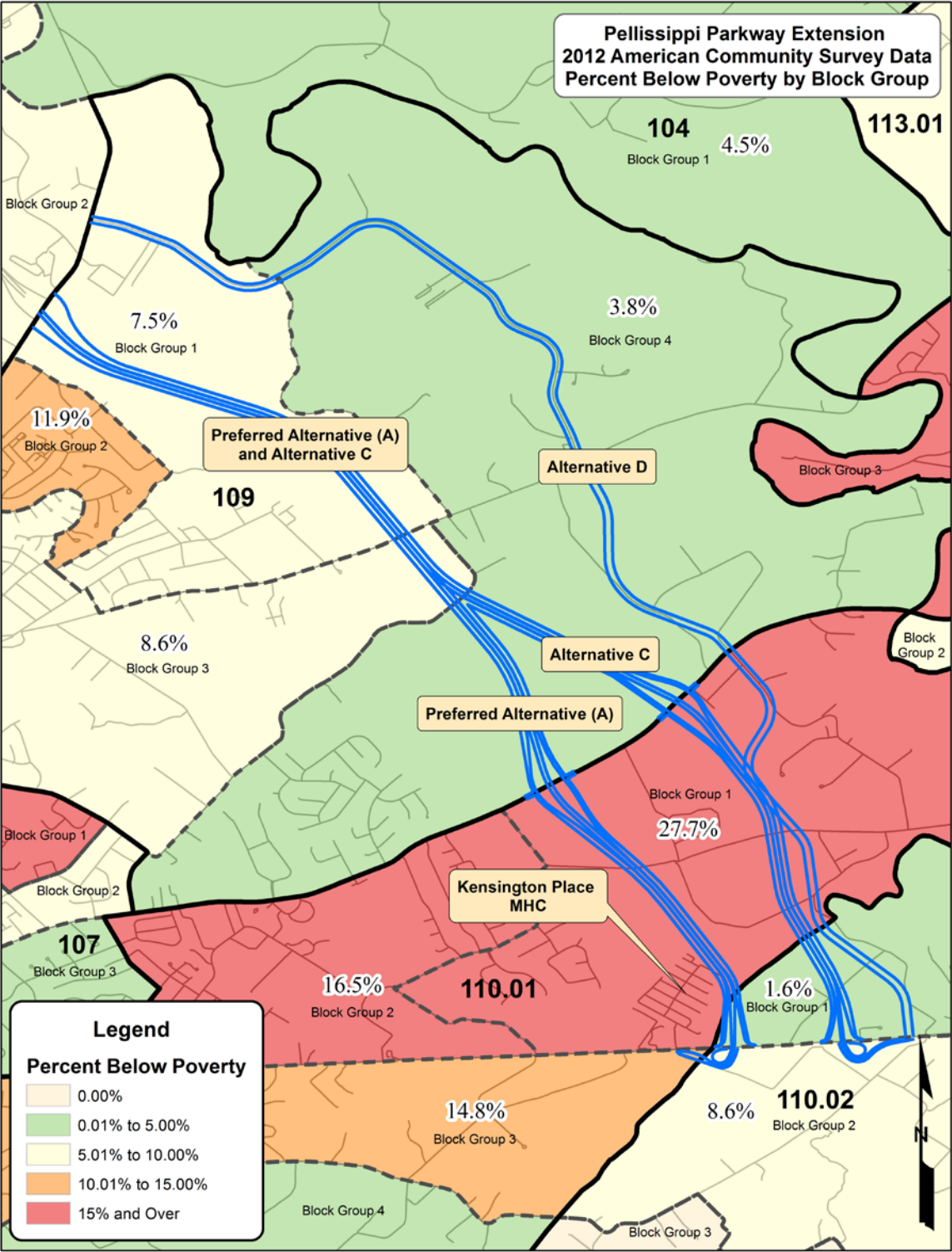
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**Table 1 – Persons below the Poverty Level, 2012**

	Blount County	CT 109	CT 109 BG 1	CT 109 BG 2	CT 109 BG 3	CT 109 BG 4	CT 110.01	CT 110.01 BG 1	CT 110.01 BG 2	CT 110.01 BG 3	CT 110.02	CT 110.02 BG 1	CT 110.02 BG 2	CT 104 BG 1
Percent persons below poverty level	11.7%	5.4%	7.5%	11.9%	8.6%	3.8%	15.7%	27.7%	16.5%	14.8%	4.7%	1.6%	8.6%	4.5%

Source: 2012 American Community Survey

Figure 4 – Percent of Persons below the Poverty Level, 2012



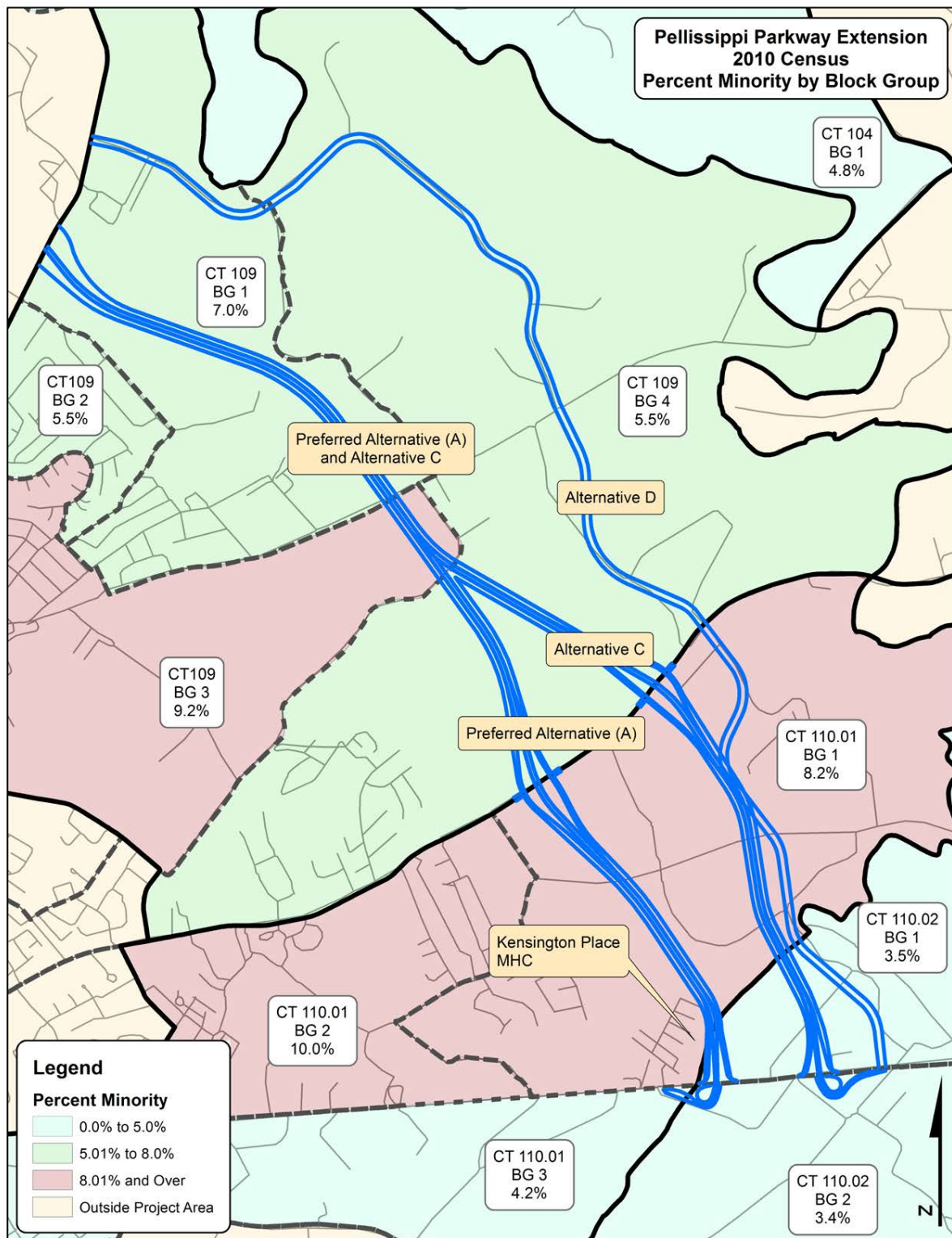
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### Minority Populations

The 2010 US Census data provides block group level data for minority persons. Table 2 and Figure 5 illustrate the percentages of minority persons in the census tracts and block groups that comprise the general area of the DEIS and Preferred Alternative.

Census Tract 110.01, Block Group 2, which is not crossed by any of the project alternatives, has the highest percent of minority persons (10 percent). The next highest minority population (9.2 percent) is in Census Tract 109, Block Group 3, within the city of Maryville; this block group is crossed by the combined alignment of the Preferred Alternative and DEIS Alternative C. Census Tract 110.01, Block Group 1, which includes the Kensington Place mobile home community and is crossed by all project alternatives, has the third highest minority population (8.2 percent).

**Figure 5 – Minority Population by Census Block Groups**





**Table 2 - Minority Population, 2010**

		Blount County	CT 104	CT 104 BG 1	CT 109	CT 109 BG 1	CT 109 BG 2	CT 109 BG 3	CT 109 BG 4	CT 110.01	CT 110.01 BG 1	CT 110.01 BG 2	CT 110.01 BG 3	CT 110.02	CT 110.02 BG 1	CT 110.02 BG 2
Total Population		123,010	3,217	1,781	5,812	1,018	1,031	1,829	1,934	5,524	1,410	1,829	1,431	3,986	1,450	1,232
Hispanic	#	3,441	74	26	170	32	30	82	26	160	84	42	22	53	17	12
	% of total	2.80%	2.30%	1.46%	2.92%	3.14%	2.91%	4.48%	1.34%	2.90%	5.96%	2.30%	1.54%	1.33%	1.17%	0.97%
White	#	113,240	2,987	1,695	5,410	947	974	1,661	1,828	5,131	1,295	1,646	1,371	3,847	1,399	1,190
	% of total	92.06%	92.85%	95.17%	93.08%	93.03%	94.47%	90.81%	94.52%	92.89%	91.84%	89.99%	95.81%	96.51%	96.48%	96.59%
Black	#	3,314	86	17	94	25	11	43	15	94	2	71	14	18	11	6
	% of total	2.69%	2.67%	0.95%	1.62%	2.46%	1.07%	2.35%	0.78%	1.70%	0.14%	3.88%	0.98%	0.45%	0.76%	0.49%
American Indian and Alaska Native	#	365	6	5	19	0	1	3	15	18	7	4	2	18	6	7
	% of total	0.30%	0.19%	0.28%	0.33%	0.00%	0.10%	0.16%	0.78%	0.33%	0.50%	0.22%	0.14%	0.45%	0.41%	0.57%
Asian	#	863	12	11	51	1	6	6	38	55	5	44	3	11	5	2
	% of total	0.70%	0.37%	0.62%	0.88%	0.10%	0.58%	0.33%	1.96%	1.00%	0.35%	2.41%	0.21%	0.28%	0.34%	0.16%
Native Hawaiian and Other Pacific Islanders	#	25	0	0	0	0	0	0	0	1	0	0	0	2	0	0
	% of total	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%
Some Other Race Alone	#	109	3	2	4	1	0	3	0	3	1	0	0	1	1	0
	% of total	0.09%	0.09%	0.11%	0.07%	0.10%	0.00%	0.16%	0.00%	0.05%	0.07%	0.00%	0.00%	0.03%	0.07%	0.00%
Two or More Races	#	1,653	49	25	64	12	9	31	12	62	16	22	19	36	11	15
	% of total	1.34%	1.52%	1.40%	1.10%	1.18%	0.87%	1.69%	0.62%	1.12%	1.13%	1.20%	1.33%	0.90%	0.76%	1.22%
Total Minority	#	9,770	230	86	402	71	57	168	106	393	115	183	60	139	51	42
	% of total	7.94%	7.15%	4.83%	6.92%	6.97%	5.53%	9.19%	5.48%	7.11%	8.16%	10.01%	4.19%	3.49%	3.52%	3.41%

Source: 2010 Census of Population.

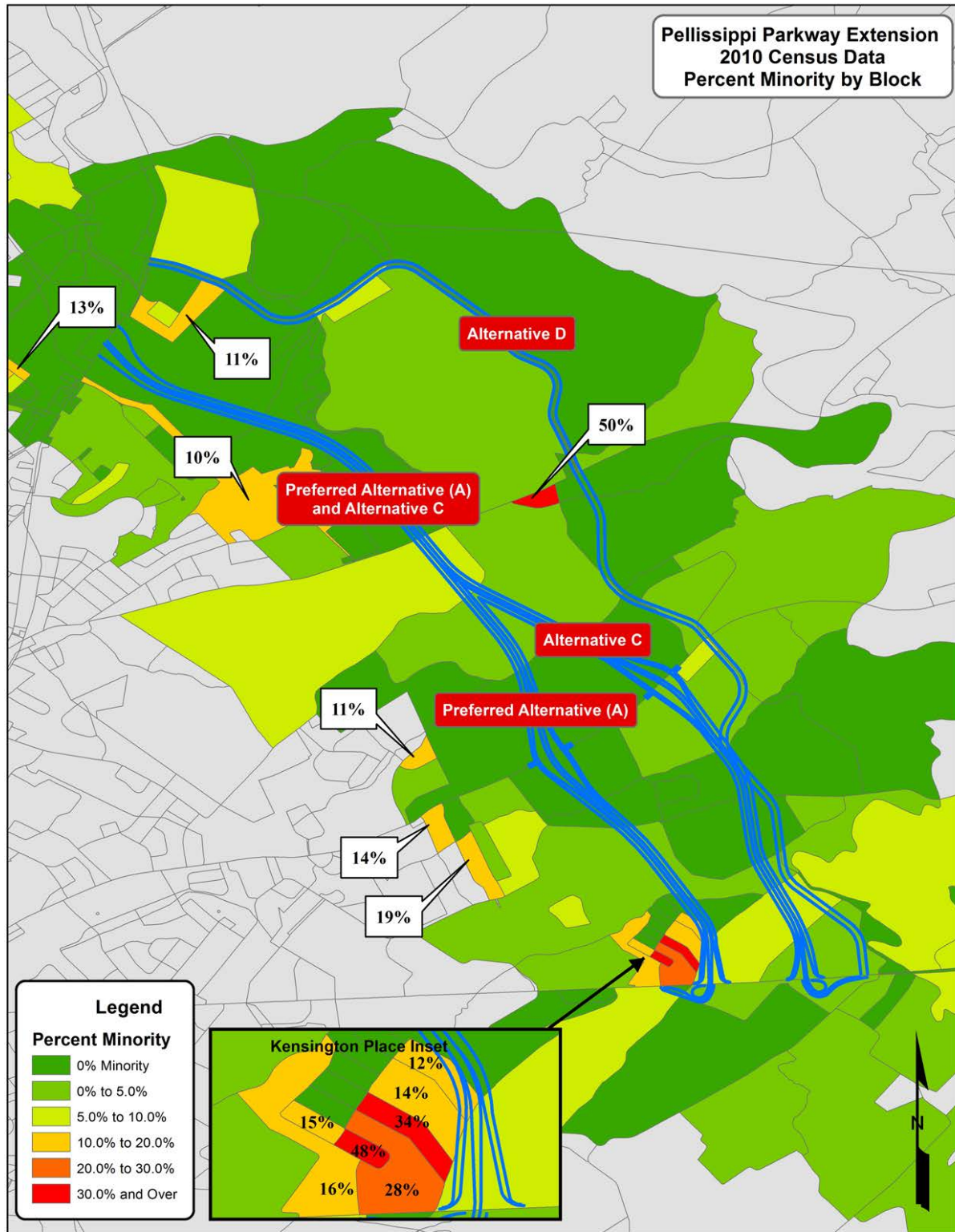
Figure 6 illustrates the minority composition of individual census blocks in the project area. There are scattered individual blocks with greater than 10 percent minority concentrations, and one block along Wildwood Road comprised of 50 percent minority residents. The blocks that comprise the Kensington Place mobile home community have a concentration of minority persons. As shown in Table 3, this community has a much larger share of minority residents (23.7 percent) compared with the vast majority of the surrounding area. Most of the minority population within the community is Hispanic. Overall Hispanic persons comprise about 20 percent of the total population of the community.

**Table 3 – Minority Population for Kensington Place Mobile Home Community, 2010**

		Blount County	CT 110.01	CT 110.01, BG 1	Blocks in mobile home park
Total Population		123,010	5,524	1,410	352
White	#	113,240	5,131	1,295	270
	% of total	92.1%	92.9%	91.8%	76.7%
Total Minority	#	9,770	393	115	82
	% of total	7.9%	7.1%	8.2%	23.3%
Total Hispanic	#	3,441	160	84	70
	% of total	2.8%	2.9%	6.0%	19.9%
Black	#	3,314	94	2	0
	% of total	2.7%	1.7%	0.1%	0.0%
Asian	#	863	55	5	3
	% of total	0.7%	1.0%	0.4%	0.85%
American Indian & Alaska Native	#	365	18	7	3
	% of total	0.3%	0.3%	0.5%	0.85%
Other Races	#	1,787	66	17	6
	% of total	1.5%	1.2%	1.2%	1.7%

Source: 2010 Census of Population.

Figure 6 – Percent Minority by Census Blocks, 2010



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### Limited English Proficiency

EO 12898 does not include persons with limited English proficiency (persons for whom English is not their primary language) in the definition of minority persons. However, with the higher ethnicity reported in the southern portion of the project area, another indicator to consider is that of limited English proficiency. The 2010 Census data shows the number and percent of persons consider linguistically isolated by block groups. Table 4 and Figure 7 indicate that there are concentrations of Spanish speakers in two of the Census block groups in the vicinity of the Preferred Alternative. In the Census block group encompassing the Kensington Place mobile home community (CT 110.01, BG 1), 9.7 percent of people speak Spanish or Spanish Creole as their primary language. However, another Block Group in the project area (CT 109, BG 3) has a higher portion of persons speaking Spanish or Spanish Creole (12.5 percent) as their primary language. This block group also has the highest concentration of minority residents in the project area. While Census Tract 109, Block Group 3 is crossed by the combined alignment of the Preferred Alternative (DEIS Alternative A) and DEIS Alternative C, there are only scattered individual homes in the immediate vicinity of the combined alignment. The concentrations of limited English proficiency population of this block group are farther west, closer into Maryville.



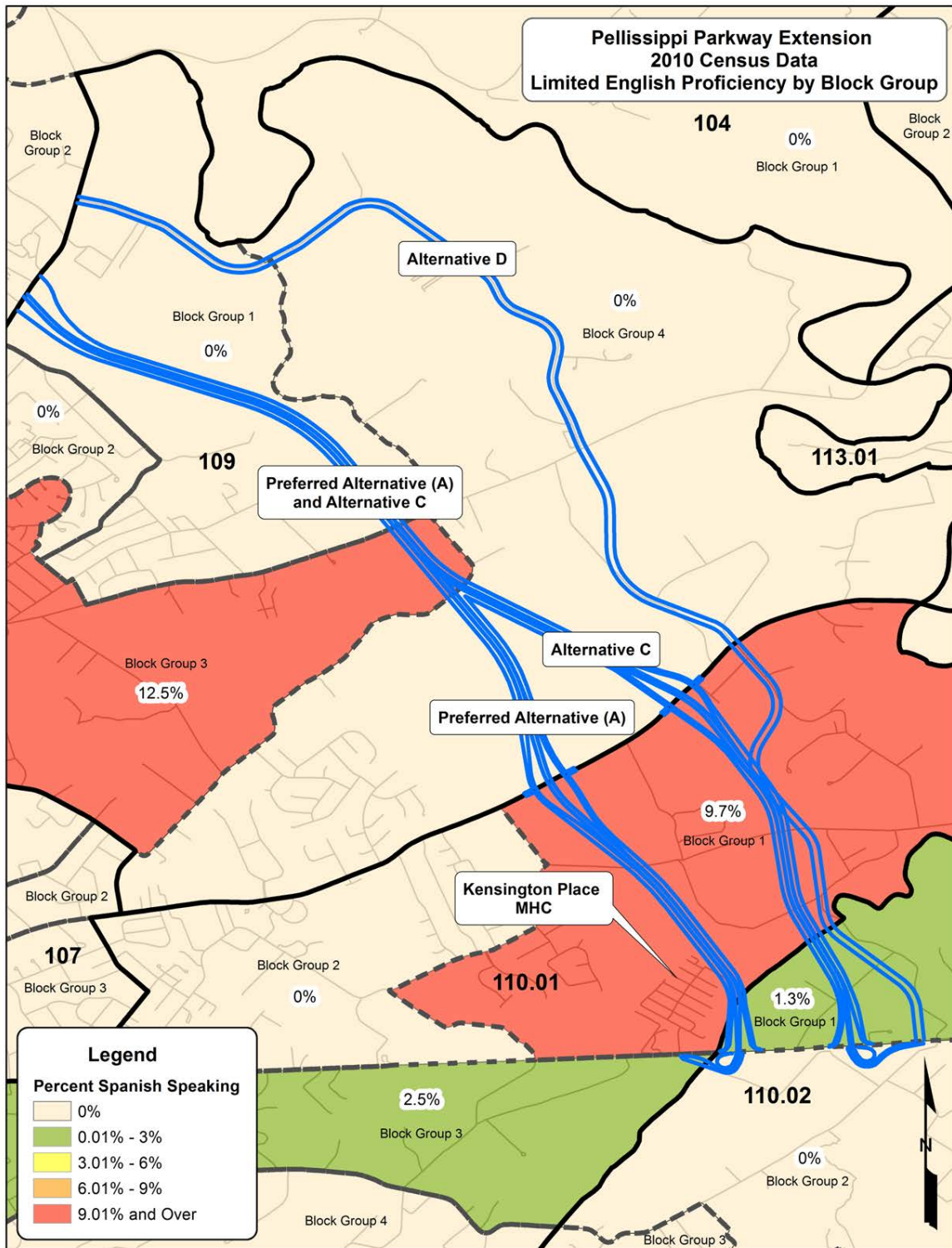
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**Table 4 – Limited English Proficiency, 2010**

	Blount County	CT 109	CT 109 BG 1	CT 109 BG 2	CT 109 BG 3	CT 109 BG 4	CT 110.01	CT 110.01 BG 1	CT 110.01 BG 2	CT 110.01 BG 3	CT 110.02	CT 110.02 BG 1	CT 110.02 BG 2	CT 104	CT 104 BG 1
Speaks only English	96.50%	95.0%	100%	100.0%	85%	100.0%	93.6%	87.6%	100.0%	97.5%	99.1%	98.7%	100.0%	99.2%	100.0%
Speaks Spanish or Spanish Creole	2.60%	4.2%	0.0%	0.0%	12.5%	0.0%	6.3%	9.7%	0.0%	2.5%	0.6%	1.3%	0.0%	0.7%	0.0%
Asian and Pacific Island languages	0.40%	0.5%	0.0%	0.0%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%
Other languages	0.20%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Source: 2010 Census of Population.

Figure 7 – Limited English Proficiency, 2010



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## Potential Impacts to Environmental Justice Communities

Within the project area there are scattered locations of low-income and/or minority persons. Only one area, however, has a concentration of the protected populations that would be directly affected by the project. The Environmental Justice community is the Kensington Place mobile home community.

This section describes the potential impacts of the No-Build, DEIS Alternatives C and D, the Preferred Alternative with East Shift and the Preferred Alternative with West Shift on the Kensington Place residents.

### No-Build Alternative

The No-Build Alternative would not have a disproportionately high and adverse impact to low-income and/or minority persons residing in the Kensington Place mobile home community. There would be no changes in conditions within this community as a result of this alternative.

### DEIS Alternatives C and D

The DEIS Alternatives C and D would not have a disproportionately high and adverse impact to low-income and/or minority persons residing in the Kensington Place mobile home community. There would be no changes in conditions within this community as a result of this alternative.

### Preferred Alternative With West or East Shift

As analyzed in the DEIS, Alternative A (now Preferred Alternative) would have an effect on the low-income and minority mobile home community, taking about 1.5 acres of land from the northeastern edge of the community, but not acquiring any of the mobile homes. With the avoidance shifts proposed in 2013, the impact of the project on the mobile home community would be slightly different depending upon which avoidance alignment was selected. The West Shift would move the right-of-way of the Preferred Alternative farther into the mobile home community, taking about 4.8 total acres. This alternative would acquire six occupied mobile homes and result in substantial noise impacts for the community. The East Shift would move the right-of-way of the Preferred Alternative outside the community boundary but would continue to have a noise impact on the mobile home community.

The impacts associated with the Preferred Alternative with West Shift and the Preferred Alternative with East Shift to the Kensington Place mobile home community are primarily displacements, visual and noise.

**Displacement** – The Preferred Alternative with West Shift would take six homes in the mobile home community, about five percent of the occupied homes in the community. The residences to be relocated are in the rear (northwestern) portion of the community. There are numerous available lots within Kensington Place where displaced residents can relocate if they so choose. Refer to Figure 3 on page 7.

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The Preferred Alternative with East Shift would not take any mobile homes within the Kensington Place community.

Table 5 summarizes the findings of the May 2014 Conceptual Stage Relocation Plan prepared by TDOT.

**Table 5 – Displacements**

	Preferred Alternative (A)	Preferred Alternative with East Shift	Preferred Alternative with West Shift
<i>Entire Alternative</i>			
Single Family Homes	5	5	5
Mobile Homes	0	1	6
Businesses	1	1	1
<i>Within Kensington Place</i>			
Single Family Homes	0	0	0
Mobile Homes	0	0	6
Businesses	0	0	0

Source: TDOT, Conceptual Stage Relocation Plan, May 2014.

**Visual** – The Preferred Alternative with West Shift would place a major new transportation facility within the northwestern corner of the Kensington Place community property. Some of the residents, primarily those in the northeastern portion of the mobile home community, would experience a substantial change in their existing view, from natural vegetation and agricultural activities to a new major roadway. The new edge of right-of-way would be within 10 to 50 feet of several mobile homes.

With the Preferred Alternative with East Shift, the new roadway would be outside of the community, and would be farther away both physically (about 400 feet) and visually from the mobile homes.

**Noise** – Both alternatives would result in noise impacts to the Kensington Place community. The East Shift would result in noise impacts to 28 residences in the Kensington Place community while the West Shift would impact 45 residences in the community, assuming a noise barrier would not be built.

Noise barriers were evaluated to mitigate the predicted noise impacts in the Kensington Place community. In order for noise barriers to be included in a project, they must be determined to be both feasible and reasonable in accordance with TDOT's 2011 Noise Policy. Noise Analysis Area 4, which includes the mobile home community, was evaluated for feasibility and reasonableness. Noise barriers under either shift are feasible since there are no cross streets or frequent driveway access points that would significantly decrease a sound barrier's acoustical effectiveness. Feasibility also includes a majority of impacted first row receptors receiving a 5 dB noise reduction (acoustic feasibility). Noise barriers for this area are acoustically feasible for both the East and West shifts.



Potential noise barriers must also pass a “reasonableness” test. For a noise barrier to be considered reasonable, the first test is that the noise barrier must provide at least a 7 dB noise reduction at 60 percent or more of the first-row benefited receptors (the noise reduction design goal). Table 6 illustrates that either alternative would meet the noise reduction design goal.

**Table 6 - Noise Reduction Design Goal Analysis for Noise Analysis Area 4**

Noise Analysis Area	First-Row Benefited Receptors			Noise Reduction Design Goal Met?
	Total	Receiving 7 dB IL	Percent	
Preferred Alternative (A)	1	3	33.3%	No
Preferred Alternative with East Shift	4	3	75%	Yes
Preferred Alternative with West Shift	4	4	100%	Yes

Source: Bowlby and Associates, *Noise Technical Report*, June 2014.

The noise analysis area was then tested to determine whether the noise barrier area per benefited residence is less than or equal to the allowable noise barrier area per benefited residence in each noise analysis area. Table 7 shows the results of the barrier design and reasonableness analysis. With the East Shift, the area per benefited residence is greater than the allowable area per benefited residence for Area 4; therefore, a noise barrier is not reasonable with the East Shift. With the West Shift, a noise barrier is reasonable.

**Table 7 – Barrier Reasonableness Analysis**

Area	Length (ft)	Average Height (ft)	Barrier Area (sf)	Benefitted Residences	Area Per Benefitted Residence (sf)	Allowable Area Per Benefitted Residence (sq)	Reasonable ?
Pref Alt with East Shift	1,870	22	41,628	11	3,784	1,900	No
Pref Alt with West Shift	1,268	16	19,646	11	1,747	1,900	Yes

Source: Bowlby and Associates, *Noise Technical Report*, June 2014.

In compliance with TDOT’s 2011 Noise Policy, noise barriers were evaluated to mitigate the predicted noise impacts in the Kensington Place community. The results of this preliminary analysis indicate that a noise barrier would be feasible and reasonable at this community under the Preferred Alternative with West Shift. To minimize adverse impacts to the mobile home community, TDOT is committed to build a noise barrier for the community with the Preferred Alternative with West Shift, provided that benefited residences and property owners give their approval. TDOT will conclude that a community desires the construction

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of a noise barrier unless a majority (at least 51 percent) of the benefited property owners and residents indicate that they do not want the proposed noise barrier.

Table 8 summarizes the as-built impacts expected to occur in the Kensington Place community with the East Shift (with no noise barrier) and the West Shift (with a barrier). Attachment A to this memo presents the detailed preliminary results of the analysis of the two alternatives, prepared by Bowlby and Associates, May 28, 2014. Included in Attachment A is a figure showing the location of noise receivers in Area 4.

**Table 8 –As Built Noise Impacts**

Alternative	Substantial Increase	Approach or Exceed NAC	Increases Higher than the Other Shift
West Shift (with barrier)	20	2	45
East Shift (no barrier)	28	2	8

Source: Bowlby and Associates, *Noise Technical Report*, June 2014.

Under the West Shift with a noise barrier, 20 residences would experience a substantial increase in noise. With the East Shift, 28 homes within the community would experience a substantial noise increase without the benefit of a noise wall. Under either alternative, two homes would approach or exceed the Noise Abatement Criteria (NAC) of 67 dBA; that is, noise levels would be 66 dBA or higher. These two homes are along Lamar Alexander Parkway, not technically a part of the mobile home park, and their current noise levels are 62 to 63 dBA due to the existing noise on Lamar Alexander Parkway. Noise levels with either shift would be between 66 and 68 dBA.

Both alternatives would result in increased noise for residents of the mobile home community. Sound levels would be higher with the West shift with a barrier for 45 residences; under the East shift without a barrier sound levels would be higher for eight residences. The differences in noise level increases between the two alternatives is primarily 3 dBA or less; 3dBA is usually the smallest change in traffic noise levels that people can detect without specifically listening for the change. The West Shift would cause a higher increase (4 to 5 dBA) at three residences while the East Shift would cause a 4 to 5 dBA increase at four residences. Twelve of the residences would have the same level of increase for either alternative. Based on this assessment, the differences in the as-built noise impacts of the East and West Shifts do not appear to be significant.

### **Coordination, Access to Information and Participation**

Throughout the EIS process there have been substantial efforts to achieve public participation along the proposed corridor and in the project area. These efforts include two public scoping meetings in 2006 and two public informational meetings (October 2007 and February 2008) held to solicit public input into the purpose and need statement and the alternatives to be evaluated. The meetings were held at public schools within a mile of the corridor. A newsletter was prepared and circulated in October 2008, describing the alternatives to be evaluated in the DEIS and the next steps in the process; a second

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newsletter was circulated in June 2012 announcing the selection of the Preferred Alternative. Following the approval of the DEIS in April 2010, an announcement of the availability of the DEIS and the upcoming public hearing was published in the local newspaper and mailed to a broad list of property owners, residents, public officials and organizations. Presentations and handouts from the public meetings and the public hearing have been posted on the project website as well as in the Blount County Public Library and Blount County Chamber of Commerce office. A database of names from the public meetings and comments received has been prepared and used for distribution of public notices including the two project newsletters and announcement of the public hearing/meetings.

In 2010, copies of the announcement of the availability of the DEIS and the public hearing were hand delivered by TDOT's consultants to the Kensington Place mobile home community manager for distribution. Residents from the mobile home community attended the public hearing and three comments were received. Two people opposed the project and one person was in favor.

TDOT held a community briefing on Thursday, May 30, 2013 to engage those persons and businesses potentially affected by the proposed minor alignment shifts. The briefing was held from 5:00 to 7:00 p.m. at the Rio Revolution Church on US 321/SR 73 in the vicinity of the mobile home community. More than 1,000 notices, in English and Spanish, were mailed to persons and organizations on the project database, to property owners in the area, and to addresses in the potentially affected Kensington Place mobile home community. A total of 136 people signed in at the briefing.

TDOT representatives, including ROW representatives, were present to answer questions and explain project displays. Meeting materials and the slideshow presentation were available in both English and Spanish. A looped slideshow presentation was shown in both English and Spanish. A Spanish translator was available for those with limited English proficiency to sign in for the meeting and understand the concepts presented. The translator assisted several families and individuals during the meeting.

TDOT received more than 150 comments during the meeting and the comment period.. Attachment B contains the summary of the Community Briefing comments and TDOT responses.

[Note: Translators were not available at previous meetings, and mailings and handouts were only printed in English.]

## **Summary**

Consistent with Executive Order 12898 on Environmental Justice and the Final DOT Environmental Justice Order 5610.2(a), FHWA must ensure that any of their respective programs, policies, or activities that may have a disproportionately high and adverse effect on populations protected by Title VI ("protected populations") will only be carried out if:

- (1) A substantial need for the program, policy, or activity exists, based on the overall public interest; and

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- (2) Alternatives that would have less adverse effects on protected populations (and that still satisfy the need identified in part (1)), either
- a. Would have other adverse social, economic, environmental or human health impacts that are severe; or
  - b. Would involve increased costs of extraordinary magnitude.

The analysis presented in the previous section of this memo demonstrates that the Preferred Alternative with West Shift would result in adverse impacts to the low-income and minority residents in the Kensington Place mobile home community. Residents of Kensington Place would experience adverse impacts due to increased noise, changes in the views, and displacements.

TDOT considered an alignment shift to avoid or minimize impacts to the protected population. TDOT determined that shifting the alignment to the east (Preferred Alternative with East Shift) to avoid the Environmental Justice community would result in other adverse social, economic, environmental or human health impacts that would be severe. These impacts include:

- Operations of two active farms. The East Shift would take five farm buildings and reduce access to agricultural fields in active production;
- A recently constructed church is on the north side of US 321 immediately east of the proposed on-ramp for the East Shift. The alignment would reduce access to the church by members during heavy traffic times and may result in increased visual and noise impacts to external activities of the church; and
- With either alignment shift, Kensington Place residents would experience increased noise levels. With the eastern shift, the mobile home community would not be eligible for a noise barrier.

The No-Build Alternative would avoid direct impacts to the protected populations in Kensington Place, but it would not meet the Purpose and Need for the project. The No-Build Alternative does not address:

- Travel options for motorists who utilize the existing road network;
- The need for a northwest/east connection east of Alcoa and Maryville;
- Safety concerns along the existing roadway network within the study area; and
- The traffic congestion and poor level of service (LOS) for some of the major arterial roads in the study area. (The LOS along major roads in the study area will deteriorate to LOS E/F in the year 2040 under the No-Build Alternative.)

DEIS Alternative C would avoid direct impacts to the protected populations in Kensington Place, but it would result in other impacts that would be severe if the Environmental Justice community were avoided. Adverse impacts include:

- Displacing 25 single family homes and two mobile homes (total of 27 residences). Twenty-three of the 27 residences to be displaced are in two clusters. One cluster is in the footprint of the proposed interchange with Sevierville Road (US-411) in which



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11 homes would be displaced. The second cluster is in the footprint of the proposed interchange with US 321, in which 12 residences would be displaced.

- Affecting more downstream reaches of larger tributaries of Little River than the Preferred Alternative with West Shift.

DEIS Alternative D would avoid direct impacts to the protected populations in Kensington Place, but it would result in other impacts that would be severe if the Environmental Justice community were avoided. Adverse impacts include:

- Displacing 39 single family residences and two mobile homes (total of 41 residences). The displaced residences are scattered along the alignment, but 17 of the 41 are clustered in the vicinity of the Peppermint Hills Drive community.
- The forecasted traffic volumes for Alternative D exceed the carrying capacity of a two-lane road; thus this alternative would not serve the traffic demands that are anticipated in future years.
- Proximity to the Little River, a designated Exceptional Tennessee Water that is Blount County's primary source for drinking water.

As the overall need for the project remains in the public interest and the Preferred Alternative with East Shift and the DEIS Alternatives C and D would result in other severe impacts, TDOT recommends carrying out the Preferred Alternative with West Shift for the proposed project. To mitigate for the adverse impacts to the protected population, TDOT commits to construction of a noise barrier for the Kensington Place mobile home community to mitigate the predicted noise impacts. TDOT also will seek input from community residents regarding the landscaping and color/pattern of the barrier in order to minimize possible visual impacts to the community as a result of the barrier and the new roadway.

The TDOT Civil Rights Office has reviewed this memo and found that the assessment and methodology used is in keeping with the laws that govern projects that are federally funded, specifically Title VI of the 1964 Civil Rights Act (letter dated June 10, 2014 in Attachment C).

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## **Attachment A**

### **Noise Analysis Results for West and East Shift**

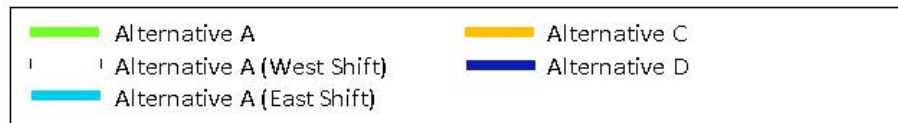
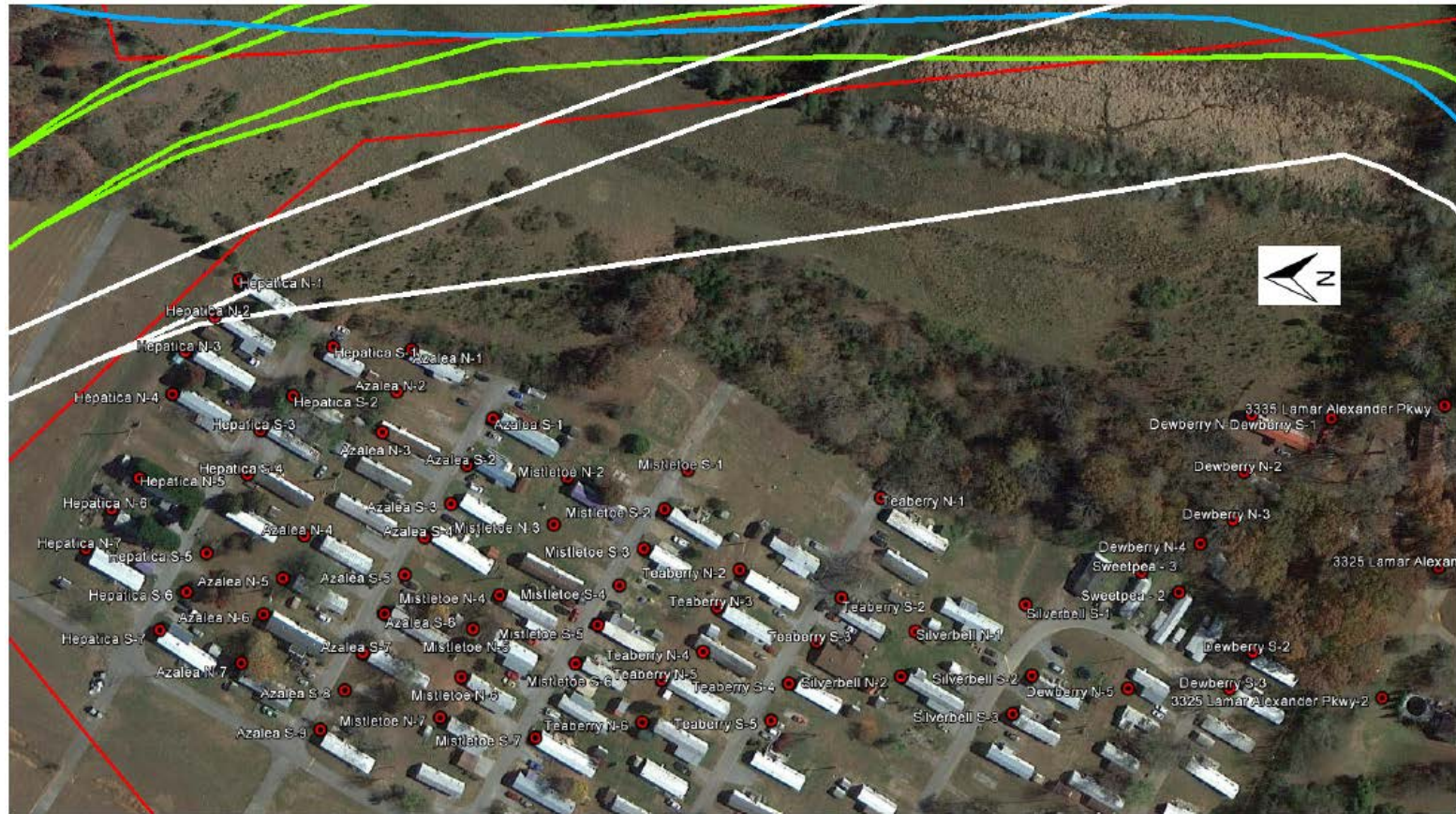
## Noise Analysis Results of West Shift and East Shift by Receiver

<b>Project:</b>	Pellissippi Parkway Extension
<b>Noise Analysis Area:</b>	4
<b>Description:</b>	Kensington Place mobile home community and single-family residences on Lamar Alexander Parkway.
<b>Background Sound Level</b>	40

ALTERNATIVE A													
Receiver	Number of Residences	Existing Sound Level (dBA)		Design Year West Shift Sound Level With Barrier (dBA)		Design Year Build East Shift Sound Level (dBA)		West Shift Increases over Existing With Barrier (dBA)		East Shift Increases over Existing (dBA)		Difference in Increase between west and east (positive is west is higher) (dBA)	
		PM	PM with background	PM	PM with background	PM	PM with background	PM	PM with background	PM	PM with background	PM	PM with background
Hepatica N-1	1	44	45	Take	Take	63	63	Take	Take	19	17	Take	Take
Hepatica N-2	1	43	45	Take	Take	61	61	Take	Take	18	16	Take	Take
Hepatica N-3	1	43	45	Take	Take	61	61	Take	Take	17	16	Take	Take
Hepatica N-4	1	43	45	Take	Take	60	60	Take	Take	17	15	Take	Take
Hepatica N-5	1	43	45	59	59	58	58	16	14	15	13	1	1
Hepatica N-6	1	43	45	60	60	57	57	17	15	15	13	2	2
Hepatica N-7	1	42	44	60	60	56	56	18	16	13	11	5	5
Hepatica S-1	1	44	45	Take	Take	61	61	Take	Take	17	16	Take	Take
Hepatica S-2	1	44	45	55	55	59	59	12	10	16	14	-4	-4
Hepatica S-3	1	43	45	57	57	59	59	13	12	15	14	-2	-2
Hepatica S-4	1	43	45	57	57	57	57	14	12	14	12	0	0
Hepatica S-5	1	43	45	58	58	56	56	15	13	13	11	2	2
Hepatica S-6	1	43	44	59	59	55	55	16	14	12	11	4	3
Hepatica S-7	1	42	44	59	59	54	55	17	15	12	10	5	4
Azalea N-1	1	45	46	Take	Take	61	61	Take	Take	16	15	Take	Take
Azalea N-2	1	45	46	57	57	60	60	13	11	15	14	-3	-3
Azalea N-3	1	45	46	56	56	58	58	11	10	14	13	-2	-2
Azalea N-4	1	44	45	57	57	56	56	13	11	12	11	1	1
Azalea N-5	1	44	45	57	57	55	55	13	12	11	10	2	2
Azalea N-6	1	43	45	57	57	54	54	14	12	11	9	3	3
Azalea N-7	1	43	45	57	57	53	53	14	13	10	8	4	4
Azalea S-1	1	46	47	57	57	60	60	11	11	14	13	-2	-2
Azalea S-2	1	45	46	56	56	58	58	11	10	13	12	-2	-2
Azalea S-3	1	45	46	55	56	57	57	11	10	12	11	-1	-1
Azalea S-4	1	44	46	55	55	55	55	10	9	11	10	-1	-1
Azalea S-5	1	44	46	55	55	54	54	10	9	10	9	0	0
Azalea S-6	1	44	46	55	55	54	54	11	10	10	8	1	1
Azalea S-7	1	44	45	55	55	53	53	11	10	9	8	2	2
Azalea S-8	1	44	45	56	56	53	53	12	11	9	8	3	3
Azalea S-9	1	43	45	56	56	53	53	12	11	9	8	3	3
Mistletoe N-2	1	47	48	58	58	59	59	11	10	11	11	0	0
Mistletoe N-3	1	47	48	57	57	57	57	10	10	10	10	0	0
Mistletoe N-4	1	46	47	56	56	55	55	10	9	9	9	1	1
Mistletoe N-5	1	46	47	56	56	55	55	10	9	9	8	1	1
Mistletoe N-6	1	45	46	55	55	54	54	10	9	9	8	1	1
Mistletoe N-7	1	45	46	55	55	53	53	10	9	8	7	2	2
Mistletoe S-1	1	48	49	60	60	59	59	11	11	11	10	1	0
Mistletoe S-2	1	48	49	59	59	58	58	11	10	10	10	1	1
Mistletoe S-3	1	48	48	58	58	58	58	10	10	10	9	1	1
Mistletoe S-4	1	47	48	57	57	56	56	10	9	9	8	1	1
Mistletoe S-5	1	47	48	57	57	56	56	10	9	9	8	1	1
Mistletoe S-6	1	47	47	56	56	55	55	9	8	8	7	1	1
Mistletoe S-7	1	46	47	55	55	53	53	9	8	7	7	2	2
Teaberry N-1	2	49	49	60	60	59	59	11	11	10	10	1	1
Teaberry N-2	2	49	50	59	59	58	58	10	9	9	8	1	1
Teaberry N-3	1	48	49	58	58	57	57	9	9	9	8	1	1
Teaberry N-4	1	48	48	57	57	56	56	9	8	8	8	1	1
Teaberry N-5	1	48	48	56	56	55	55	9	8	8	7	1	1
Teaberry N-6	1	47	48	56	56	55	55	9	8	7	7	1	1
Teaberry S-2	1	49	49	59	59	57	57	10	9	8	8	1	1
Teaberry S-3	1	49	49	58	58	57	57	9	9	8	7	1	1
Teaberry S-4	1	48	49	57	57	55	56	9	8	7	7	2	2
Teaberry S-5	1	48	48	56	56	55	55	8	8	7	6	2	2
Silverbell N-1	1	50	50	59	59	58	58	9	9	8	8	1	1
Silverbell N-2	1	49	50	58	58	57	57	9	8	8	7	1	1
Silverbell S-1	1	50	51	59	59	58	58	9	8	8	7	1	1
Silverbell S-2	1	51	52	59	59	58	58	7	7	7	7	1	1
Silverbell S-3	1	51	52	59	59	58	58	7	7	7	6	1	1
Dewberry N-1	1	56	56	64	64	63	63	7	7	7	7	1	1
Dewberry N-2	1	56	56	63	63	62	62	7	7	6	6	1	1
Dewberry N-3	1	55	55	62	62	62	62	7	7	6	6	0	0
Dewberry N-4	1	53	54	61	61	60	60	7	7	7	7	0	0
Dewberry N-5	1	51	52	59	59	58	58	7	7	6	6	1	1
Dewberry S-2	1	54	54	59	59	60	60	6	5	6	6	0	0
Dewberry S-3	1	52	53	59	59	58	58	7	6	5	5	1	1
Sweetpea - 2	1	52	53	60	60	59	59	7	7	7	7	1	1
Sweetpea - 3	1	52	52	60	60	59	59	8	8	7	7	1	1
Dewberry S-1	1	59	59	65	65	64	64	6	6	6	6	0	0
3335 Lamar Alexander Pkwy	1	63	63	68	68	68	68	4	4	4	4	0	0
3325 Lamar Alexander Pkwy-1	1	62	62	67	67	66	66	4	4	4	4	0	0
3325 Lamar Alexander Pkwy-2	1	59	59	63	63	63	63	4	4	4	4	0	0

Condition	Number
Increase Higher with West Shift	45
Increase Higher with East Shift	8
Same Increase	12
Difference of 1 dB	32
Difference of 2 dB	12
Difference of 3 dB	5

## Noise Receivers in Area 4



Area 4

*Note: Red line represents Noise Analysis Area boundaries. White line represents West Shift. Medium blue line represents East Shift.*

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**Attachment B**  
**May 30, 2013 Community Briefing Summary**

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## **Community Briefing Meeting Summary Pellissippi Parkway Extension (SR 162) Thursday May 30, 2013**

### **Meeting Participants**

The Community Briefing was attended by approximately 136 people. Each person attending the community briefing was asked to sign-in for purposes of counting those in attendance. Thirteen Tennessee Department of Transportation (TDOT) representatives along with four Parsons Brinckerhoff employees were also in attendance.

### **Meeting Purpose**

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The purpose of the Community Briefing was for TDOT to provide the opportunity to discuss with the public two potential minor shifts in the route of the Preferred Alternative and the possible impacts of those shifts. In addition to providing updated project information, TDOT was interested in obtaining comments, interests, and concerns from those potentially affected by the shifts.

### **Meeting**

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The briefing was held from 5:00 to 7:00 pm EST at the Rio Revolution Church, in Maryville, TN. Prior to the Community Briefing, approximately 1,000 flyers were mailed out to residents making them aware of the meeting. In addition to the mailings, John Barrett (TDOT) stated that 97 handouts were distributed to residents located in the Kensington Place Mobile Home Community.

On site at the Rio Revolution Church, information tables were set at the main entrance lobby. Signs were placed at secondary entrances directing visitors to the front entrance. On the tables a community briefing handout, comment card, and facts sheet were available in both English and Spanish. Members of the public attending the meeting were also greeted and given a concise description of what to expect at the meeting and where information was located. No formal presentation was given, however a looped slideshow was provided to give the community information about the project. This presentation presented in both English and Spanish.

When people were finished watching the slideshow, signs directed them to breakout rooms where project location maps and TDOT representatives were available to answer questions. In total, three rooms were set up for this purpose. Each room contained a minimum of two project display maps and several ROW representatives, to answer questions.

For non-English speaking attendees, TDOT provided a Spanish translator to ensure full understanding of the concepts presented. It was noted at the meeting that the translator was utilized by two families in attendance.

### **Meeting Comments**

The deadline for comments to be received by TDOT was originally set to be June 10, 2013. To provide the public additional time to respond to the information presented at the Community Briefing, TDOT extended the deadline to June 15, 2013. To make people aware of the comment period extension, TDOT posted a notice on the project website, mailed post cards to everyone who signed in to the briefing, and sent emails to person who had provided their email addresses to make people them aware of the extension.

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As of June 17, 2013, TDOT has received 157 comments by mail (letter or comment card), e-mail, or comment cards submitted at briefing. All comments were noted in the project database. Several people submitted comments in various formats. A summary of the comments received is included in the following table.

**Summary of Public Comments by Topic**

Topic	Representative Comment	Response
Support for Extension	The county can use the extension. It serves the greater good with minimal impact to environment or persons displaced and/ or affected.	Comments noted.
Opposed to Project	This road project is not beneficial for Blount County and the East TN region. It will not solve problems, will lead to additional traffic issues, increased sprawl, and will harm long term resources of productive farmland, wildlife habitat, and watershed protection. We need other solutions that do not degrade the quality of life for a minimum of driving time saved.	Comments noted.
Prefer West Shift	The western shift will be more pleasing visually to property owners in Sweetgrass Plantation. The western shift will reduce the noise potential to property owners in Sweetgrass Plantation.	Comments noted.
Prefer East Shift	The east shift seems preferable in this situation and would have the least environmental impact on the surrounding community.	Comments noted.
Improve Current Roads	TDOT should maintain and improve existing roads.	Comments noted.
Traffic	The extension will not address the fundamental traffic challenges we face in Blount County and will in fact make some of them worse, especially on US 411 N. There have been too many fatal traffic accidents here lately and none of them would have been prevented if the project had existed. We have many dangerous highways and the project will not divert traffic from any of them or make it enough quicker to get anywhere to justify this expensive and destructive highway.	Comments noted.
Archaeology	What is the environmentally sensitive area? Is it an Indian burial ground?	The site is an archaeology site that has been determined eligible for the National Register. It does not contain human remains or burial sites. Based on the identification, testing, and coordination with the SHPO, it has been determined that the site contains information that has yielded or may be likely to yield information important in prehistory or history.

### Summary of Public Comments by Topic, continued

Topic	Representative Comment	Disposition
Archaeology	What steps has TDOT taken to inform Native American Tribes and the SHPO of the identified site?	The Phase II Archaeological Report (2012), which documented one archaeological site as eligible for listing on the National Register, has been coordinated with the SHPO. The SHPO concurred with TDOT's eligibility recommendation. Additional investigations of proposed avoidance shifts to avoid the site have been conducted and documented in two addenda to the 2012 Phase II report. The addenda are being coordinated with the SHPO, and the Native American tribes that have expressed an interest in the project. TDOT is following procedures defined in its own policies, as well as the requirements of Section 106 of the National Historic Preservation Act as amended.
Impacts to Mobile Home Community	I am one of the owners of the six mobile homes in Kensington Place. I am opposed to the west shift. This would create a financial worry and burden. I have no desire to have to be uprooted and pay for another home. Never heard back from an appraiser in 2002. I should have been informed prior to buying this house.	Owners of the mobile homes that would be relocated by the proposed project will receive relocation assistance, including assistance to secure a comparable residence that meets current standards for safe and decent housing. While mobile home owners will be able to choose where they want to live, there are numerous vacant parcels in this mobile home community,
	Everyone on my street is willing to sell their homes. People would like to be bought out. A lot of drugs and other activity that we don't want our children around. We are asking you to choose the west route.	Comment noted.

### Summary of Public Comments by Topic, continued

Topic	Representative Comment	Disposition
Impacts to Sweetgrass Plantation	Homes in Sweetgrass Plantation are high value (\$400,000-\$600,000) and if these homes lose value due to visual and noise impact, that will result in a negative impact on tax revenue for Blount County. We were informed that sound barrier walls will not be constructed by Sweetgrass due to low population density. As the map is not up to date, we challenge this point and ask at what density levels does the noise mitigation wall become a requirement? The subdivision has 96 lots for homes with approximately 40 owners. These owners maintain the upkeep of this subdivision, it is not a subdivision owned by one or two developers. As of today there are ten homes in Sweetgrass Plantation. The map presented is not up to date [doesn't show all of the new homes in the Subdivision—now 9].	The preliminary noise analysis conducted for the two avoidance shifts was prepared in compliance with the requirements of FHWA guidance for the identification of highway traffic noise impacts and the TDOT Policy on Highway Traffic Noise Abatement. The results of the barrier analysis for the eastern shift demonstrated that the area does not qualify for a noise barrier based on the information currently available. The conclusions derived from the current noise analysis are preliminary, and final decisions regarding noise abatement measures will be based on a subsequent noise study that will be completed using the design plans for the project. The public will have the opportunity to comment on the results of that analysis at the design public hearing.
Request extension for comments	Because the links on the webpage were not updated to allow the public to gain access materials from the May 30, 2013 meeting as of June 1, we request that the comment deadline a minimum of two weeks after all the links are corrected and after we are notified that all the links are correct. How and when will you be informing people potentially affected by the two possible realignments about the extension and the new deadline?	The link to the website has been corrected and the deadline for comments was extended 5 days to June 15, 2013. A notice was placed on the website and postcards were mailed to persons who attended the community briefing. Emails were also sent to those persons who had provided email addresses.
Release of Technical Studies	More straight forward and detailed information about TDOT's updated technical studies, especially those pertaining to ecology and archaeology, might have enabled citizens to offer more useful answers when we were asked for input. Please release the technical studies and evaluation so that the decision is as transparent as possible.	The technical study updates for the Preferred Alternative and the proposed alignment shift are being finalized and most will be made available when the FEIS is circulated for public comment. TDOT is prohibited by the provisions of the National Historic Preservation Act of 1966 (16 U.S.C. 470), as amended, from releasing the archaeology reports to the public in order to protect the resource.
Explain selection criteria	What criteria will TDOT use to consider the results of the environmental screening and the comments provided in selecting the alignment shift?	As stated in the community briefing handout, TDOT will determine which minor alignment shift to incorporate into the previously selected Preferred Alternative based on the assessment of the environmental screening conducted for the east and the west shifts, and taking into consideration input received from the Community Briefing.

### Summary of Public Comments by Topic, continued

Topic	Representative Comment	Disposition
Need for Supplemental EIS	<p>Since the DEIS was circulated in 2010, TDOT has taken a number of actions that affect analysis of the impacts of the proposed PPE. In view of the actions and changes listed below, we believe a Supplemental Environmental Impact Statement is necessary:</p> <ol style="list-style-type: none"> <li>Revised traffic forecasting, as evident in the Sept. 2011 Addendum to Traffic Operations Technical Report.</li> <li>Shift in emphasis from improvements in Level of Service to intersection delay.</li> <li>Community briefing on the possible change in alignment to avoid an environmentally sensitive area.</li> <li>Updated technical studies and evaluations as stated in the materials distributed at the May 30, 2013 community briefing: "Hazardous Materials, Noise, Ecology, Safety, Archaeology" and evaluations of the two 'avoidance' shifts:</li> </ol>	TDOT is currently preparing a reevaluation to determine whether a supplement to the DEIS is necessary. It is TDOT's opinion that there are no major changes in the project and significant impacts not previously disclosed
Need for a Written Reevaluation	Before TDOT can decide not to prepare Supplement DEIS, a written reevaluation must be prepared due to the passage of time since the DEIS was circulated.	TDOT is currently preparing a reevaluation to determine whether a supplement to the DEIS is necessary. It is TDOT's opinion that there are no major changes in the project and significant impacts not previously disclosed

In addition to the comments noted on comment cards turned in at the meeting, in emails or by mail, general comments and questions were made to TDOT representatives during the meeting. As with the comments submitted in written form, the questions and areas of interest encompassed a wide range of topics. Representatives answered numerous questions from those in attendance. Some of the topics included:

- How should I let my comments be known to TDOT?
- I live at this location, how will the project impact me?
- When will the project be built?
- What type of archaeological site did TDOT find?
- If my house is in the proposed right-of-way should I make improvements to it?
- How does the right-of-way purchasing process work and what is the timeline for purchasing?
- When will I know how far the road is going to be from my house (when will right-of-way and design plans be complete)?
- What are the next steps in the environmental and design process?
- Why did right-of-way acquisition stop?



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- Why is TDOT looking at Alternative D again?

Questions and comments to TDOT representatives came both from citizens in favor of the project and those against the project. Some comments and questions were answered by explaining the processes TDOT uses in project development since the design and right of way stages of the project are not complete.

### ***Media***

Following the meeting, both the *Knoxville News Sentinel* and *The Daily Times* ran articles discussing the meeting. Prior to the briefing, an article was also published in *The Daily Times* discussing the upcoming meeting. The author of the article incorrectly stated that previous alignments were now being considered and included information from prior meetings not related to the purpose of the scheduled community briefing. TDOT was made aware of this after the conclusion of the community briefing. This information better explained why some citizens had renewed concerns about locations outside the current study area.

### ***Conclusion***

The Community Briefing gave citizens an opportunity to discuss potential shifts to the Pellissippi Parkway extension project, to ask questions, to have questions/concerns answered, and to have local opinions of the project heard by TDOT. The briefing also gave citizens the opportunity to have factual, up-to-date information presented in a setting that allowed discussion by everyone in attendance.

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**Attachment C**  
**Coordination with TDOT Civil Rights, 2014**

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**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION  
Civil Rights Office**

Suite 1800, James K. Polk Building  
505 Deaderick Street, Nashville, Tennessee 37243  
Telephone No. 615-741-3681, Fax No. 615-741-3169

June 10, 2014

Environmental Divisions  
ATTN: Margaret Slater  
James K. Polk Building, Suite 900  
505 Deaderick Street  
Nashville, Tennessee 37243-0384

**Subject: Pellissippi Parkway Extension EIS: TDOT Project Number 05097-1226-  
04/Agreement E0132**

Thank you for including the Tennessee Department of Transportation's (TDOT) Civil Rights Office (CRO) in the review the Pellissippi Parkway Extension DEIS. Regarding the June 9, 2014, Environmental Justice Memorandum that addresses the DEIS alternatives (A, C, and D) and the East West shifts of the Preferred Alternative (A), the TDOT CRO found the assessment and methodology used to be in keeping with the spirit of the laws that govern programs/projects that are federally funded, specifically, Title VI of the 1964 Civil Rights Act.

Thank you for the opportunity to review and comment on the Environmental Justice Memorandum for this project. Should you have questions or comments, please do not hesitate to contact Cynthia Howard, Title VI Program Director, at 615-253-1066.

Sincerely,  
  
Deborah H. Luter  
Director

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