

APPENDIX J
DRAFT SECTION 4(f) *DE MINIMIS* EVALUATION

ENVIRONMENTAL ASSESSMENT

STATE ROUTE 32 (US-321)
From State Route 73 to North of Wilton Springs Road
Cocke County, Tennessee
TDOT PIN 101422.00

Tennessee Department of Transportation
On Behalf of the Federal Highway Administration – Tennessee Division Office

**Determination of
Section 4(f) De Minimis Use**

PARK ☒ **Great Smoky Mountains National Park, Foothills Parkway**
RECREATION AREA ☐
WILDLIFE AND/OR ☐
WATERFOWL REFUGE

County: Cocke **City:** Cosby **Route:** State Route 32 (US 321)

Termini: State Route 32 (US 321) from State Route 73 to Wilton Springs Road

Project Numbers: **Federal #:** STP-32(23) **State #:** 15005-1234-04

Pin Number: 101422.00

Document Type: **EIS:** ☐ **EA:** ☒ **CE:** ☐

IDENTIFICATION OF SECTION 4(F) RESOURCE(S):

Maps/Graphics: **Attached:** ☒ **Not Attached:** ☐

DESCRIPTION OF RESOURCE:

Chartered by the US Congress in 1934 and officially dedicated by President Franklin D. Roosevelt in 1940, the **Great Smoky Mountains National Park** covers 522,427 acres straddling the Tennessee/North Carolina border from State Route (SR) 129 to SR 40. It is the most visited of the National Parks in the United States, logging over 11.3 million recreational visitors in 2017. In 1976 the park was designated as an International Biosphere Reserve and in 1983 became part of the Southern Appalachian Biosphere Reserve. It was also certified as a UNESCO World Heritage Site in 1983. Visitors can stop at one of several visitor's centers in the park and enjoy a variety of recreational activities including hiking, camping, picnicking, fishing, biking, horseback riding, visiting historic sites, wildlife viewing, or simply enjoying the beautiful scenery, wildflowers and fall colors. There are over 850 miles of trails in the park including seventy miles of the Appalachian Trail which follows the ridgeline along the Tennessee/North Carolina state border through the park.

The **Foothills Parkway** was one of seven scenic parkways authorized by congress in 1944, and the only one not fully constructed to date. The Foothills Parkway is managed by the National Park Service (NPS) as part of Great Smoky Mountains National Park. Unlike other national parkways, Foothills Parkway is not a separate unit of the national park system. As planned, the 72-mile parkway follows the foothills of the Great Smoky Mountains along the western side of Great Smoky Mountains National Park from I-40 to US 129. (See **Figure 1** below from National Park Service's website.) To date, 38.5 miles of the parkway have been constructed and are open to traffic. This includes Section A, the 5.5-mile stretch at the northern end traversing Green Mountain in Cocke County from I-40 in the Pigeon River valley to SR 32 (US 321) in Cosby, and Sections E, F, G and H stretching 23 miles from the western terminus at US 129 along the Chilhowee Lake impoundment of the Little Tennessee River to SR 321 in Wears Valley. The constructed portions represent the northern end and the western half of the proposed 72-mile parkway.

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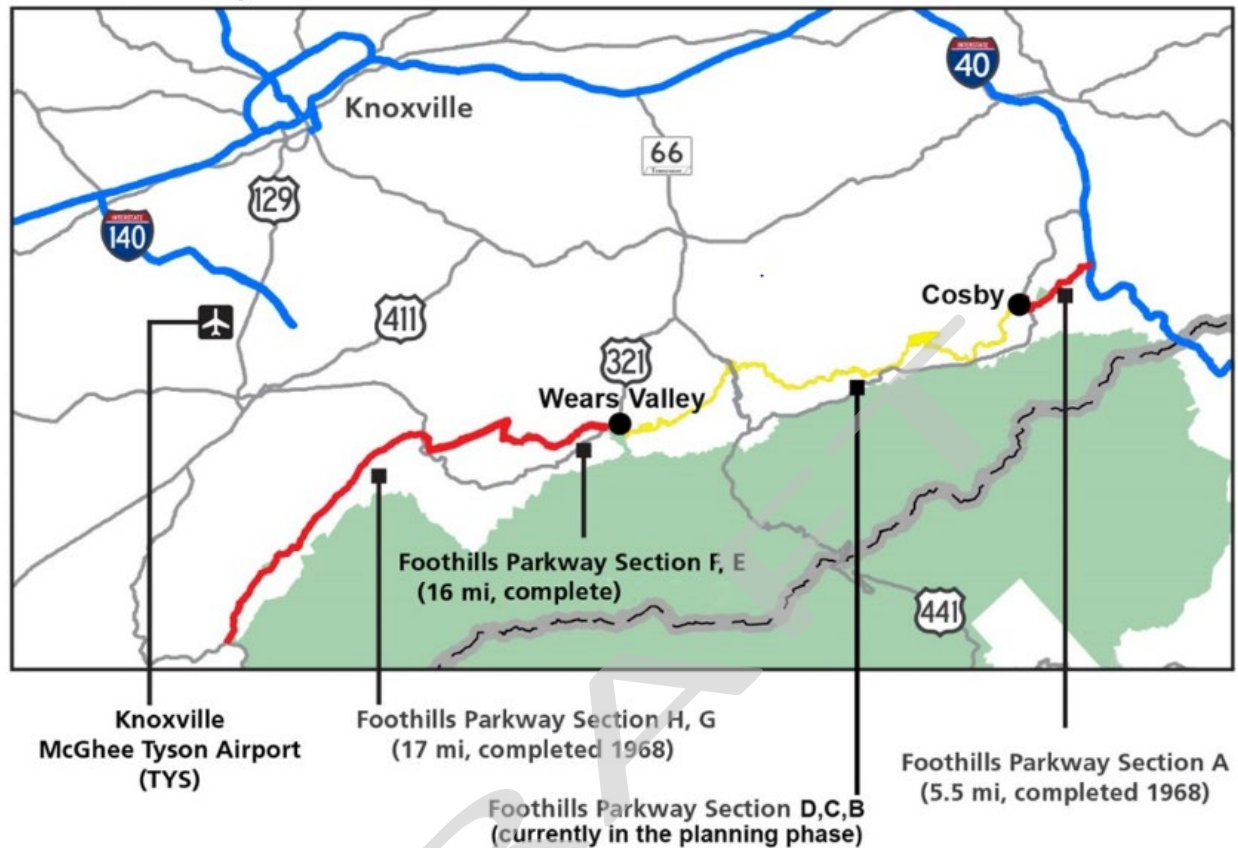


Figure 1: Foothill Parkway and Connections



Hill Top, looking east from the Green Mountain section of Foothills Parkway
(picture and map from National Park Service Website)

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BRIEF DESCRIPTION OF PROJECT SCOPE:

The project is slated to be constructed with funding assistance from the Federal Highway Administration (FHWA). The proposed project involves improving SR 32 (US 321) from its intersection with SR 73 to Wilton Springs Road, a distance of approximately 6.8 miles. (See Project Location Map in **Attachment 1**)

Two build alternatives were considered to upgrade existing SR 32. The project proposes to convert SR 32 from its existing two lanes (one lane in each direction) to five lanes (two lanes each direction with a center turn lane). The build alternatives follow different paths at the southern end of the project area, but converge and follow a common alignment from south of the intersection with the Foothills Parkway to the northern terminus at Wilton Springs Road. As a result, the impact of the project on the Foothills Parkway would be the same for both build alternatives. (See Project Alternatives Map in **Attachment 1**)

TDOT is currently proposing to construct the portion of the project from the southern terminus at SR 73 to Penland Road, which includes the upgraded intersection of SR 32 and Foothills Parkway, in two construction phases. While TDOT will acquire an easement from the NPS to accommodate the full build of SR 32 (five lanes – two lanes in each direction with a center turn lane), initial construction, or the Interim Build, will include three lanes - one lane in each direction with a center turn lane. As per coordination with the National Park Service, only the area needed for the Interim Build will be cleared for the initial construction; additional clearing will not be conducted until the additional two lanes are added for the Full Build.

The Interim Build (**Figure 2**) would consist of one 12-foot travel lane in each direction with a 12-foot, two-way center turn lane or passing lane (as appropriate). Shoulder widths would vary from four to ten feet. The Full Build (**Figure 3**) would add two additional 12-foot travel lanes, one in each direction and 10-foot shoulders.

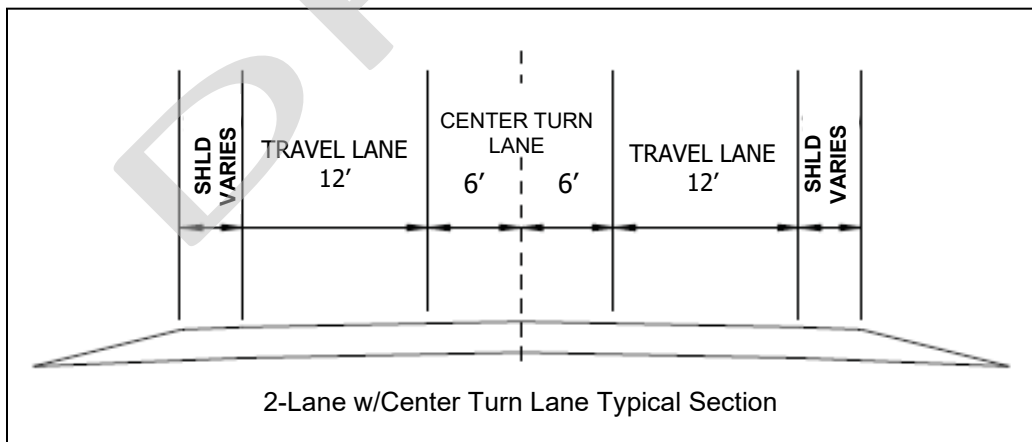


Figure 2: Proposed Typical Section-Interim Build: SR 32 (US 321) from SR 73 to Penland Road

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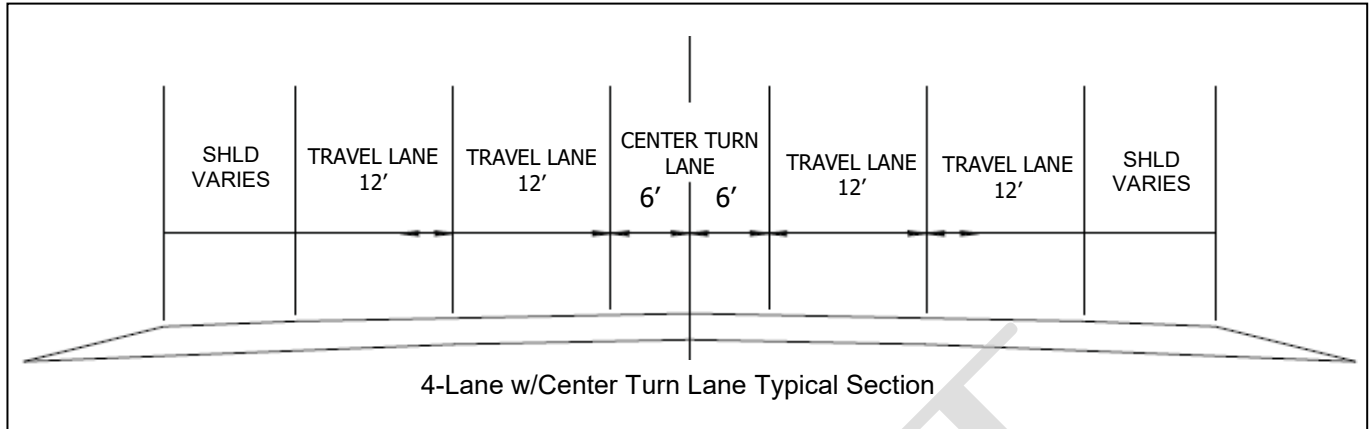


Figure 3: Proposed Typical Section-Full Build: SR 32 (US 321) from SR 73 to Penland Road

APPLICABILITY DETERMINATION:

(To be applicable answers to all statements must be "true")

For publicly owned parks, recreation areas, and wildlife and/or waterfowl refuges:

- The project involves a minor take of land from the resource. ☒ True ☐ False

Identify the total acreage of the resource: GSMNP = 522,427 acres; Foothills Parkway = approximately 6,000-7,000 acres and is part of GSMNP. The project requires use from the Foothills Parkway portion of the GSMNP.

Describe the use of land from the resource (include the acreage of the resource to be used):

The Great Smoky Mountains National Park, which includes the Foothills Parkway, encompasses over a half a million acres. The Foothills Parkway portion of the National Park, if fully constructed, would stretch for a total of 72 miles. Right-of-way for the parkway was purchased many years ago and consists of a band ranging from 500 to 1000 feet wide. The 5.5-mile section of the parkway from I-40 to Cosby (Section A) is completed and currently terminates at SR 32 (US 321). When eventually constructed, Section B of the parkway would bridge across SR 32 and continue the parkway to the west. Section B, together with Sections C and D (also not yet constructed), would connect with the constructed Sections E through H in Wears Valley completing the parkway. (See **Figure 1** which shows the Sections of the Foothills Parkway)

The SR 32 project proposes to re-align the portion of SR 32 immediately south of the existing SR 32/Foothills Parkway intersection in order to remove an S curve and improve the geometric curvature of the road to meet current roadway design standards. All of the Build Alternatives share this design feature, and as a result, require the alteration of the current terminus of the completed eastern section of the parkway at SR 32 in Cosby. The Build Alternatives would shift SR 32 to the east of its current location in the vicinity of the existing SR 32/Foothills Parkway intersection.

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In close coordination with the National Park Service, a new alignment was designed for the eastern 1,200-1,500 feet of Section A of the parkway to accommodate its connection to re-aligned SR 32. The new intersection would be located approximately 250 feet south of the current intersection.

The proposed design takes into consideration the future extension of the Foothills Parkway, Section B, and ensures that a local connection to SR 32 can be accommodated along with a new bridge carrying the parkway over SR 32. The Figure in **Attachment 2** shows the location of existing SR 32 and the Foothills Parkway, the proposed re-alignment of SR 32 and proposed new SR 32/Foothills Parkway intersection, and the proposed future connection and extension of the parkway. This future extension of the parkway is not part of the SR 32 project; it would be a separate project undertaken by the National Park Service.

The parkway itself occupies a relatively narrow band within the 500-1000 foot wide Foothills Parkway property. The relocated parkway would remain within the property boundaries, and the remnant of the old parkway would be removed (scarified). Similarly, SR 32 currently crosses through the Foothills Parkway property. The proposed re-alignment of SR 32 shifts the footprint to the east and widens the existing easement to accommodate additional lanes on SR 32. A portion of the old SR 32 would be removed (scarified) once the re-aligned SR 32 is completed.

The re-aligned parkway and existing parkway occupy a similar footprint within the Foothills Parkway property; the old portion of the parkway would be removed, so the impact of re-aligning the parkway is limited to the clearing of the vegetation needed for the new parkway alignment. The scarified area can be planted with native vegetation such that it will eventually revert to forested area.

Re-alignment and widening of SR 32 would result in a larger footprint for SR 32 as it crosses through the Foothills Parkway property. The acreage difference between the footprint of the existing SR 32 easement, and that of the easement required for the proposed Build Alternatives is 4.08 acres and represents the use of the Foothills Parkway property for the SR 32 project. The remnant of the old SR 32 outside of the easement required for the re-aligned SR 32 can be removed (scarified), and replanted with native vegetation.

As discussed previously, construction of SR 32 will be phased with an interim build of three lanes – one lane each direction with center turn lane – constructed within the easement for the full build of five lanes – two lanes each direction with center turn lane. Only the area needed for the Interim Build will be cleared for the initial construction; additional clearing will be not be conducted until the additional two lanes are added for the full build.

- **The project does not adversely affect the qualities, activities, features, or attributes of the resource that qualify it for protection under Section 4(f).** ☒ True ☐ False
- **The agency with jurisdiction over the resource has concurred in writing with FHWA's and/or TDOT's determination that the project will not adversely affect the resource.** ☒ True ☐ False

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If true, identify agency with jurisdiction and date of concurrence and attach written concurrence: National Park Service Date: Xxxx XX, 2018

See correspondence in **Attachment 3**.

- The agency with jurisdiction over the resource has been informed of ☒ True ☐ False
FHWA's and/or TDOT's intent to make a de minimis finding.

See **Attachment 3**.

- The public will be informed or afforded an opportunity to review and comment on the effects of the project on the protected activities, features, and attributes of the resource. ☒ True ☐ False

a. Describe how the public will be notified.

A Notice regarding the effects of the proposed project on the Foothills Parkway was advertised in the *Newport Plain Talk* on May 21, 2019. (See **Attachment 4**) The Notice requested public input and comments regarding the potential impacts to the parkway.

No comments were received during the comment period.

ALTERNATIVES ANALYSIS

1. Summarize why the use of property from the resource cannot be avoided.

☐ Project Needs would not be met. Explain.

☐ Substantial impacts to other environmental/cultural/social resources would result.
Explain.

☐ Project complexity would increase resulting in greater construction and maintenance cost.
Explain.

☒ Other. Explain.

The Foothills Parkway, which is a component of the GSMNP, currently ends at SR 32 and plans for the parkway would have it crossing SR 32. The crossing occurs just north of a curved section of existing SR 32. The proposed improvements to SR 32 involve straightening the existing S curve to meet current roadway design criteria and to improve safety in the corridor. In order to do this, the intersection of the Foothills Parkway and SR 32 needs to be altered.

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Any changes to SR 32 at the intersection with the Foothills Parkway would require some amount of alteration of the Foothills Parkway; however, once the improvements are made, the Foothills Parkway will continue to provide a scenic recreational pathway along the foothills of the Great Smoky Mountains. Coordination was undertaken with the National Park Service to ensure that the Build Alternatives and the reconfiguration of the SR 32/Foothills Parkway intersection will be compatible with the Park Service's plans for extending the parkway across SR 32.

2. Summarize the measures taken to minimize harm. This would include, if applicable, design shifts to minimize impacts, use of retaining walls, and other mitigation measures.

TDOT has worked closely with the National Park Service, the Official with Jurisdiction over Great Smoky Mountains National Park including the Foothills Parkway component of the park, to engineer an intersection of upgraded SR 32 and the Foothills Parkway that will operate efficiently and effectively for travelers and park visitors while minimizing impacts to the Foothills Parkway property, and facilitating the planned extension of the parkway by the NPS at a later date. The proposed project would result in approximately 4.08 acres of Foothills Parkway property being used for the SR 32 re-alignment. Abandoned remnants of the old SR 32 and Foothills Parkway will be scarified and can be planted with native vegetation to revert to natural vegetative cover. While the easement will be acquired for a five-lane SR 32, vegetation will only be cleared to accommodate the initial interim build construction of the three-lane cross section; additional clearing will not be completed until the five-lane build out.

SUMMARY AND DETERMINATION

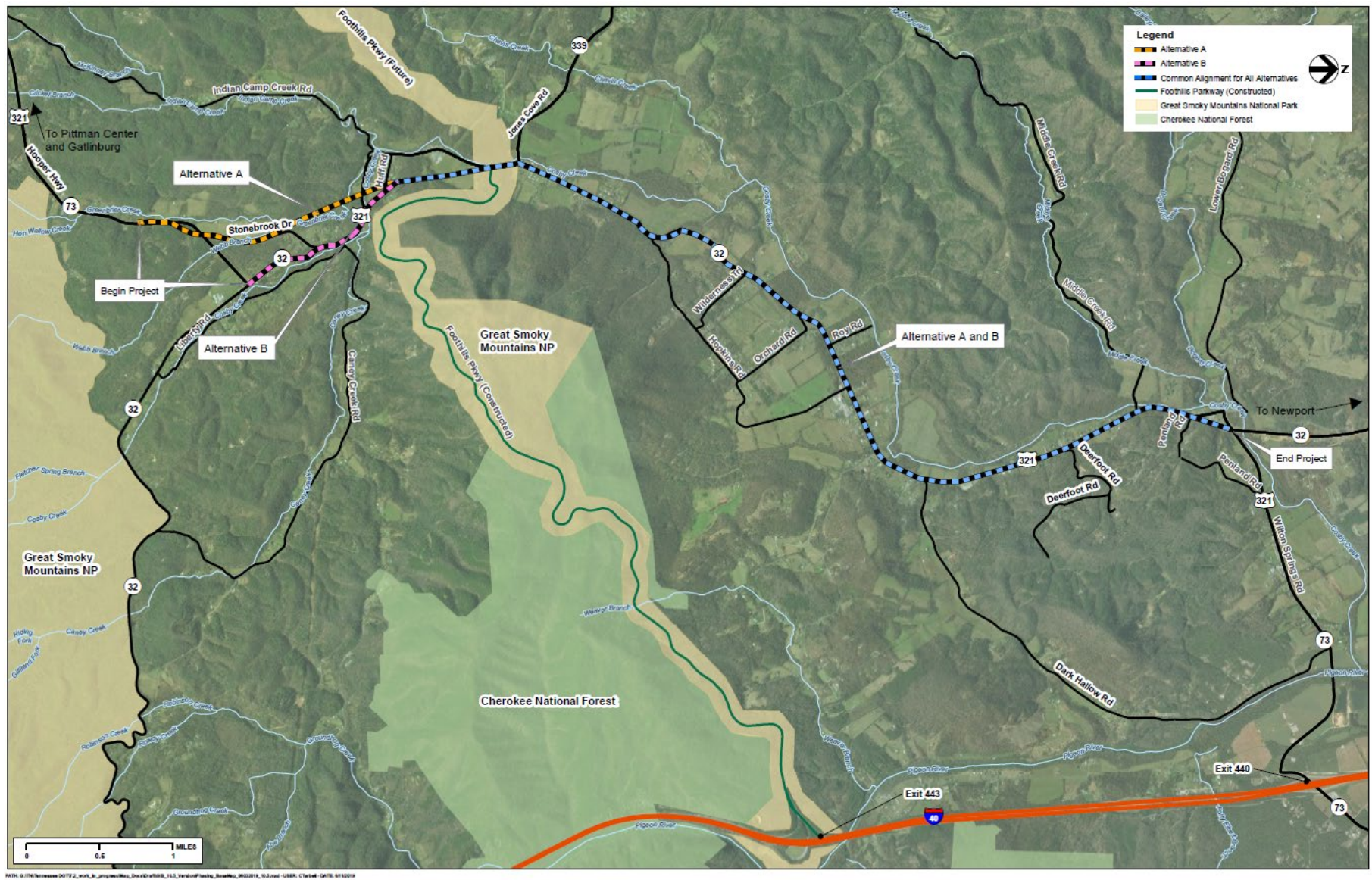
The project involves a de minimis impact on the Section 4(f) property as evidenced through the minimization of harm to a park, recreation area, or wildlife or waterfowl refuge, and as a result of mitigation to or avoidance of impacts to the qualifying characteristics and/or the functions of the resource.

Based on the scope of the undertaking; the fact that the undertaking does not adversely affect the functions/qualities of the Section 4(f) resource on a permanent or temporary basis; and with agreement from the official with jurisdiction, the proposed action constitutes a De Minimis finding.

FHWA: _____ Date: _____

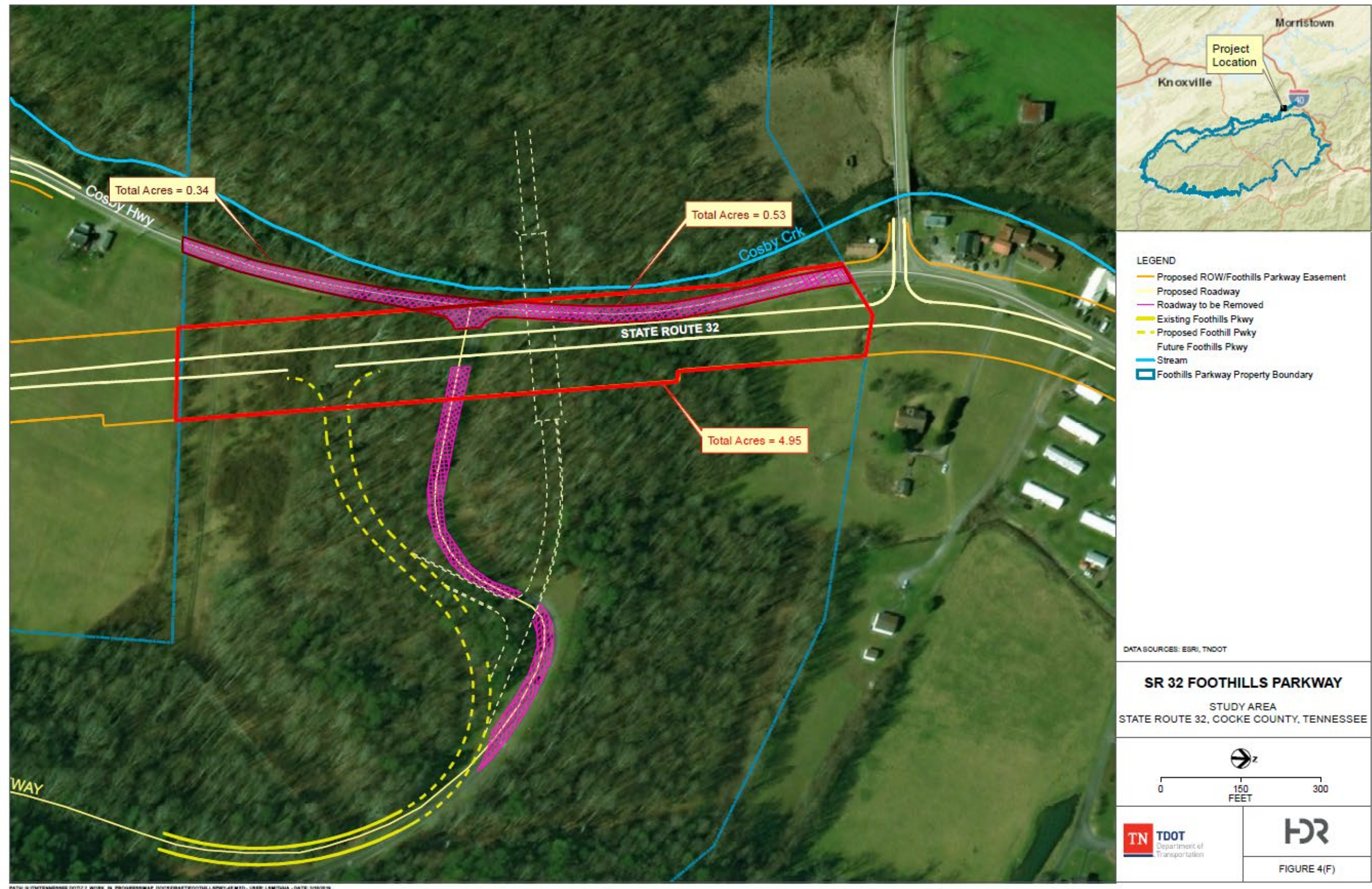
ATTACHMENTS

Attachment 1
Project Location Map
Project Alternatives Map



Project Alternatives Map

Attachment 2
Proposed Alignment in Vicinity of Foothills Parkway



Attachment 3
Correspondence with National Park Service



United States Department of the Interior

NATIONAL PARK SERVICE
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738



D30

March 1, 2018

Ms. Meredith C. Krebs
Project Manager
TDOT Environmental Division/Major Project Office
James K. Polk Building, Suite 900
505 Deaderick Street
Nashville, Tennessee 37243

Ref: State Route 32 (US-321) From State Route 73 at Cosby to Wilton Springs Road,
Cocke County, TN (PIN 101422.00)

Dear Ms. Krebs:

We have reviewed the November 2, 2017 Meeting Notes for the subject project. We understand that the Tennessee Department of Transportation (TDOT) has recently completed an Expedited Project Delivery (EPD) review and is now ready to advance the project.

We understand that through the EPD review, TDOT is looking at a phased approach to building out and that the revised alternatives currently on the table have interim typical sections and full build typical sections to be based on current and future traffic needs. A new alignment is also being considered to avoid going around the west side of the Stonebrook Subdivision and stay closer to the existing SR-32 alignment in that area. And we understand that TDOT intends to have a public meeting in the near future to present these alternatives to the public and get feedback.

The National Park Service (NPS) continues to be interested in this project specifically as it relates to the realignment of SR-32 onto the Foothills Parkway right of way. The current proposed alignment and layout of the intersection of SR-32 and Foothills Parkway appears to be in keeping with what the Park previously accepted, and we note that you have modified the layout per our comments made in the November 2, 2017 meeting. Therefore, we are in agreement with the proposed layout for the intersection of the Foothills Parkway and SR-32.

Once again we would like to reiterate our concern that the natural and cultural resources within our boundary, which may be affected by this project, need to be accurately

described and all of the effects appropriately mitigated. We understand that TDOT will be doing an Environmental Assessment (EA) per the National Environmental Policy Act (NEPA) requirements. Please keep the Park involved during the environmental studies within our right-of-way (ROW) so that our natural and cultural resource experts may review and comment on the potential affects and mitigation measures.

It is expected that this EA will also serve as the compliance documentation required by the NPS for the General Agreement and Highway Easement Deed which will have to be developed and prepared for the new construction within the Foothills Parkway ROW and for construction and long term maintenance of SR-32 on the Parkway ROW. This will avoid the need for the Park to complete a separate compliance process which would just add cost and time to the project.

We appreciate you and other TDOT staff taking time to come meet with us to talk about this project and explain the EPD process and the new typical sections and new alternative. Please keep us posted on upcoming agency and public meetings and document reviews regarding this project. If you have any questions regarding our comments, please feel free to call Imelda Wegwerth at (865) 436-1302.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cassius M. Cash".

Cassius M. Cash
Superintendent



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION**

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

CLAY BRIGHT
COMMISSIONER

BILL LEE
GOVERNOR

May 21, 2019

Mr. Cassius Cash
Superintendent
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, TN 37738

Re: Proposed State Route 32 (US 321) Project, From State Route 73 in Cosby to Wilton Springs Road,
Cocke County, Tennessee, PIN 101422.00, TDOT Project # 15005-1234-04,
Intent to Make a Section 4(f) *De Minimis* Determination for Foothills Parkway

Dear Mr. Cassius:

The State Route (SR) 32 (US 321) project would use approximately 4.08 acres of the 6,000-7000-acre Foothills Parkway property. The Foothills Parkway is part of the Great Smoky Mountains National Park (GSMNP) which encompasses over a half million acres. This use would involve the relocation of the current SR 32/Foothills Parkway intersection. In close coordination with the National Park Service, a new alignment was designed for the eastern 1,200-1,500 feet of Section A of the Foothills Parkway to accommodate its connection to re-aligned SR 32. The new intersection would be located approximately 250 feet south of the current intersection. The proposed design takes into consideration the future extension of the Foothills Parkway, Section B, and ensures that a local connection to SR 32 can be accommodated along with a new bridge carrying the parkway over SR 32.

The relocation would require the use of less than one percent of the GSMNP and 0.07 percent of the Foothills Parkway property. The recreational function of the Foothills Parkway would remain intact following construction of the SR 32 Project. The new connection between SR 32 and the Foothills Parkway was designed to improve the safety of the connection and to accommodate the future construction of Section B of the parkway.

The Department of Transportation Act of 1966 includes a special provision-Section 4(f)-which stipulates that the Federal Highway Administration (FHWA) and other Department of Transportation agencies cannot approve the use of land from publicly owned parks unless the following conditions apply:

- There is no feasible and prudent alternative to the use of land; and the action includes all possible planning to minimize harm to the property resulting from such use;
- OR
- FHWA determines that the use of the property will have a *de minimis* impact.

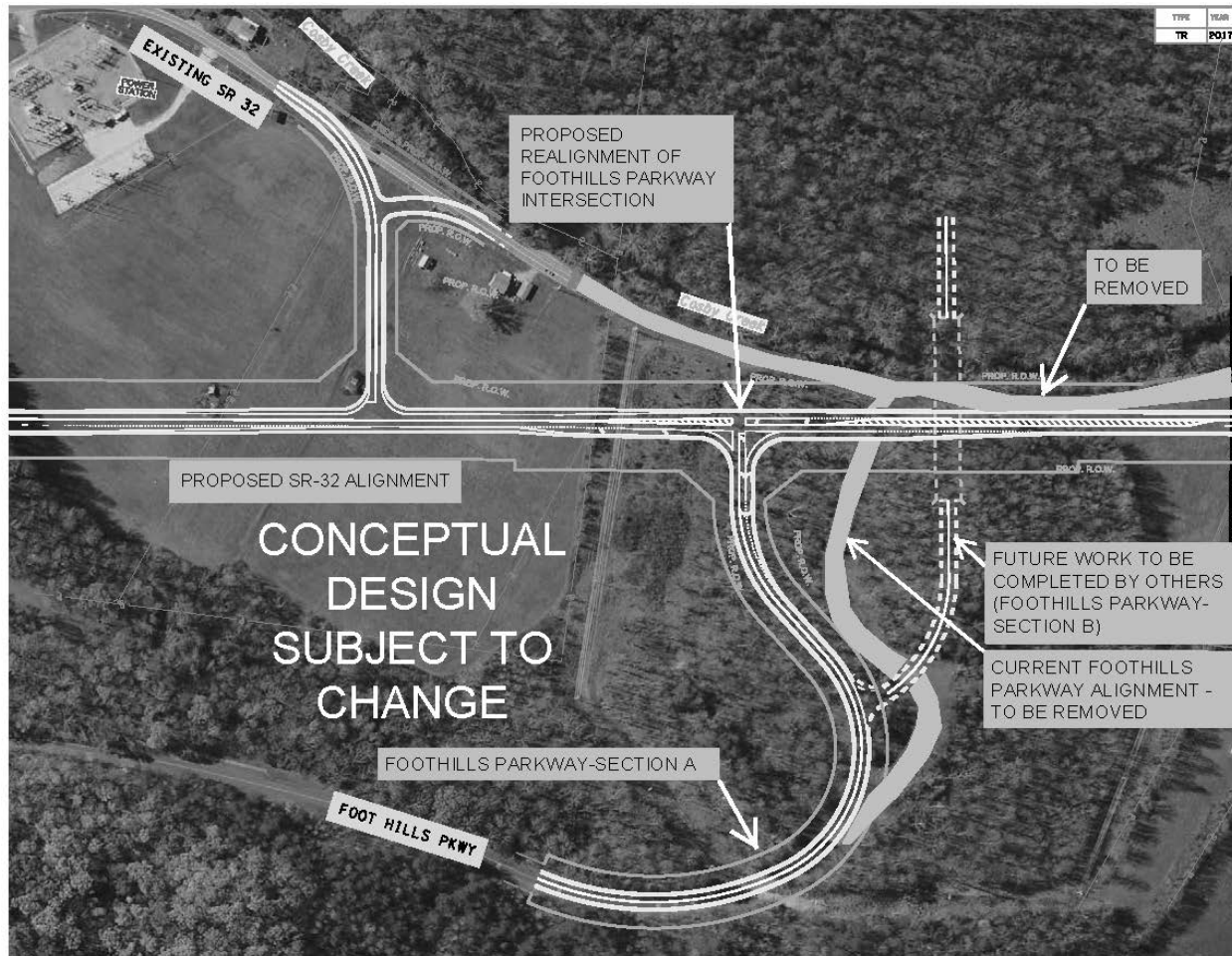
The purpose of this letter is to inform the National Park Service, as the official with jurisdiction, that the FHWA is proposing to make a *de minimis* determination regarding the potential need for acquisition of additional easement from the Foothills Parkway. Once the National Park Service acknowledges that they are aware that FHWA is proposing to make a *de minimis* impact determination for Foothills Parkway, TDOT will place a public notice in the local paper providing the public with an opportunity for review and comment on the effects of the project on the Foothills Parkway. The public comment period will be 21 days. After considering any comments received from the public, if the National Park Service concurs in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection, then FHWA may finalize the *de minimis* impact determination.

Please respond in writing acknowledging FHWA's intent to make a *de minimis* determination. A response via email to Holly.Cantrell@tn.gov should suffice. If you have any questions or concerns, please feel free to contact me at 615-532-5869 or Holly.Cantrell@tn.gov.

Sincerely,



Holly Cantrell
Manager
NEPA Special Projects



Include NPS concurrence that there are no adverse effects on features, activities, attributes of Foothills Parkway here

Attachment 4
Public Notice

TN PRESS SERVICE Clipping Bureau

(865)584-5761 newsclips@tnpress.com

Reader 0010 Tue, May 21, 2019

Newport, TN
Newport - The Newport Plain Talk
Circulation 5,932

Public Notices

Public Notices

PUBLIC NOTICE

In compliance with Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 U.S.C. § 303), hereinafter referred to as "Section 4(f)," and its implementing regulations codified at 23 C.F.R. Part 774, the Federal Highway Administration (FHWA) in cooperation with the Tennessee Department of Transportation (TDOT) and the National Park Service (NPS) provides public notice of its proposal to make a de minimis impact finding under Section 4(f) regarding the effects of the proposed SR-32 (US-321) project from SR-73 to Wilton Springs Road in Cocke County, Tennessee on the Foothills Parkway area of Great Smoky Mountains National Park (GSMNP), and to provide the opportunity for public review and comment of the proposed effects. TDOT, in cooperation with FHWA, proposes to improve SR-32 near Cosby in Cocke County, Tennessee. The proposed project begins just west of the SR-32 (US-321)/SR-73 intersection and extends eastward along SR-32 to Wilton Springs Road. Two proposed Build Alternatives are currently under consideration. Both Build Alternatives share a common alignment from a point approximately 0.5 mile south of the Foothills Parkway to the project terminus at Wilton Springs Road. As part of the project, TDOT is proposing to re-align the portion of SR-32 immediately south of the existing SR-32/Foothills Parkway intersection in order to remove an S curve and improve the geometric curvature of the road to meet current roadway design standards. The realignment of SR 32 in this area would result in the use of approximately four acres of the Foothills Parkway property. The Foothills Parkway is part of the GSMNP which encompasses over a half million acres. This use would involve the relocation of the current SR 32/Foothills Parkway intersection. TDOT, in close coordination with the National Park Service, has developed a design for the proposed realignment of the Foothills Parkway/SR-32 intersection that would locate the new intersection approximately 250 feet south of the current intersection. The proposed design takes into consideration the future extension of the Foothills Parkway to the west and ensures that a local connection to SR-32 can be accommodated along with a new bridge carrying the parkway over SR-32. The proposed relocation would require the use of less than one percent of the GSMNP and 0.07 percent of the Foothills Parkway property. The recreational function of the Foothills Parkway would remain intact following construction of the SR-32 project. The new connection between SR-32 and the Foothills Parkway was designed to improve the safety of the connection and to accommodate future construction of Section B of the Foothills Parkway. Construction of the SR-32 project will be phased. While TDOT will acquire an easement from the NPS to accommodate the full build of SR-32 (five lanes - two lanes in each direction with a center turn lane), initial construction, or the interim build, will include three lanes - one lane in each direction with a center turn lane. As per coordination with the NPS, only the area needed for the interim build will be cleared for initial construction; additional clearing will not be conducted until the additional two lanes are added for the full build. The remnant of old SR-32 outside of the easement required for the re-aligned SR-32 could be removed (scarified), and replanted with native vegetation. Additionally, future environmental commitments may be considered as the project proceeds through the project development process. The reconfiguration of SR-32 and its intersection with the Foothills Parkway represents a geometric improvement compared to the current configuration, and would not adversely affect the activities, features and attributes of the Foothills Parkway. While TDOT would acquire an easement from the NPS for maintaining SR-32, the 4.08 acres of increased easement area represents a negligible percentage of the overall 6,000-7,000 acres of the Foothills Parkway and half million acres of GSMNP. The proposed de minimis impact finding is based on coordination with the officials with jurisdiction. The official with jurisdiction is the National Park Service, which owns and administers the affected portion of the property protected by Section 4(f). The officials have been notified of FHWA's intent to make a de minimis impact finding. With the NPS's concurrence, FHWA will issue a finding of de minimis impact. Pursuant to 23 C.F.R. § 774.5(b)(2), notice is hereby provided of the proposed de minimis finding determinations. Comments regarding the proposed Section 4(f) de minimis impact finding may be submitted to TDOT in writing during the 21-day comment period; the comment deadline is June 11, 2019. Written comments may be provided to: De Minimis Comments, Attn: SR 32 Corridor Project, Tennessee Department of Transportation, Suite 700, James K. Polk Building, 505 Deaderick Street, Nashville, TN 37243.