STATE ROUTE 66

ENVIRONMENTAL ASSESSMENT

From State Route 34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66, Hawkins County, Tennessee

PIN 107579.00, Federal Project #: STP-66(38)

APRIL 2025

Submitted Pursuant to the
National Environmental Policy Act of 1969
42 USC 4332(2)(c)

LEAD AGENCIES:

U.S. Department of Transportation, Federal Highway Administration and the Tennessee Department of Transportation

Cooperating Agency:

U.S. Army Corps of Engineers, Nashville District

TN TDOT Department of Transportation

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In cooperation with the

U.S. Army Corps of Engineers, Nashville District

4/15/2025

Date

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4/9/2025
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ACRONYMS

APE	Area of Potential Effect
ARAP	Aquatic Resource Alteration Permit
ARC	Appalachian Regional Commission
BG	Block Group
BMP	Best Management Practice
CAAA	Clean Air Act Amendments
CE	Categorical Exclusion
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CPIP	Coordination and Public Involvement Plan
CSRP	Conceptual Stage Relocation Plan
CT	Census Tract
dB	Decibel
EA	Environmental Assessment
EPD	Expedited Project Delivery
EO	Executive Order
EPD	Expedited Project Delivery
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
IA	Improve Act
LM	Log Mile
MSAT	Mobile Source Air Toxics
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NGL	Natural Gas Liquids
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PIN	Project Identification Number
QR	Quick Response Code
RCRA	Resource Conservation and Recovery Act
RPO	Rural Planning Organization
SHPO	State Historic Preservation Office
SIA	State Industrial Access
SR	State Route
STIP	State Transportation Improvement Plan
SWPPP	Storm Water Pollution Prevention Plan
TDEC	Tennessee Department of Environment and Conservation
TDOT	Tennessee Department of Transportation
TESA	Tennessee Environmental Streamlining Agreement
TMA	Transportation Modernization Act
TPR	Transportation Planning Report
TWRA	Tennessee Wildlife Resources Agency
USC	U.S. Code
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
URL	Uniform Resource Locator

ENVIRONMENTAL COMMITMENTS

Cultural Resources

1. In May 2024, the Tennessee State Historic Preservation Office (TN-SHPO) concurred that the Shadowland Farm and Berry Farm are both eligible for listing in the National Register of Historic Places. As part of TDOT standard practice, the following commitments are requested:
    - Both properties should be labeled in the design plans as "historic" and have their respective National Register boundaries marked in all design plans.
    - Please add a note to the design plans that historic properties will not be used as construction staging areas.
    - Please add a note to the design plans that any blasting that may occur within the vicinity of these resources should take into consideration the historic properties and take all possible measures to avoid impacts.

1. Chapter 1 – Purpose and Need for Action

1.1. Introduction

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA), proposes to widen and realign State Route (SR) 66, from the intersection with SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to near the intersection with Speedwell Road/Old Highway 66, in Hawkins County, Tennessee.

Because the proposed project involves the use of federal funds, the project is subject to the requirements of the National Environmental Policy Act (NEPA). TDOT and FHWA are preparing an Environmental Assessment (EA) in accordance with the NEPA to identify and evaluate the environmental effects of the proposed project and to identify measures to minimize harm.

This EA has been prepared in accordance with the FHWA's implementing regulations for NEPA (23 CFR § 771[1]). FHWA and TDOT are the lead agencies for the proposed project; the U.S. Army Corps of Engineers (USACE), Nashville District has been identified as a Cooperating Agency.[2]

1.2. Description of the Project Vicinity

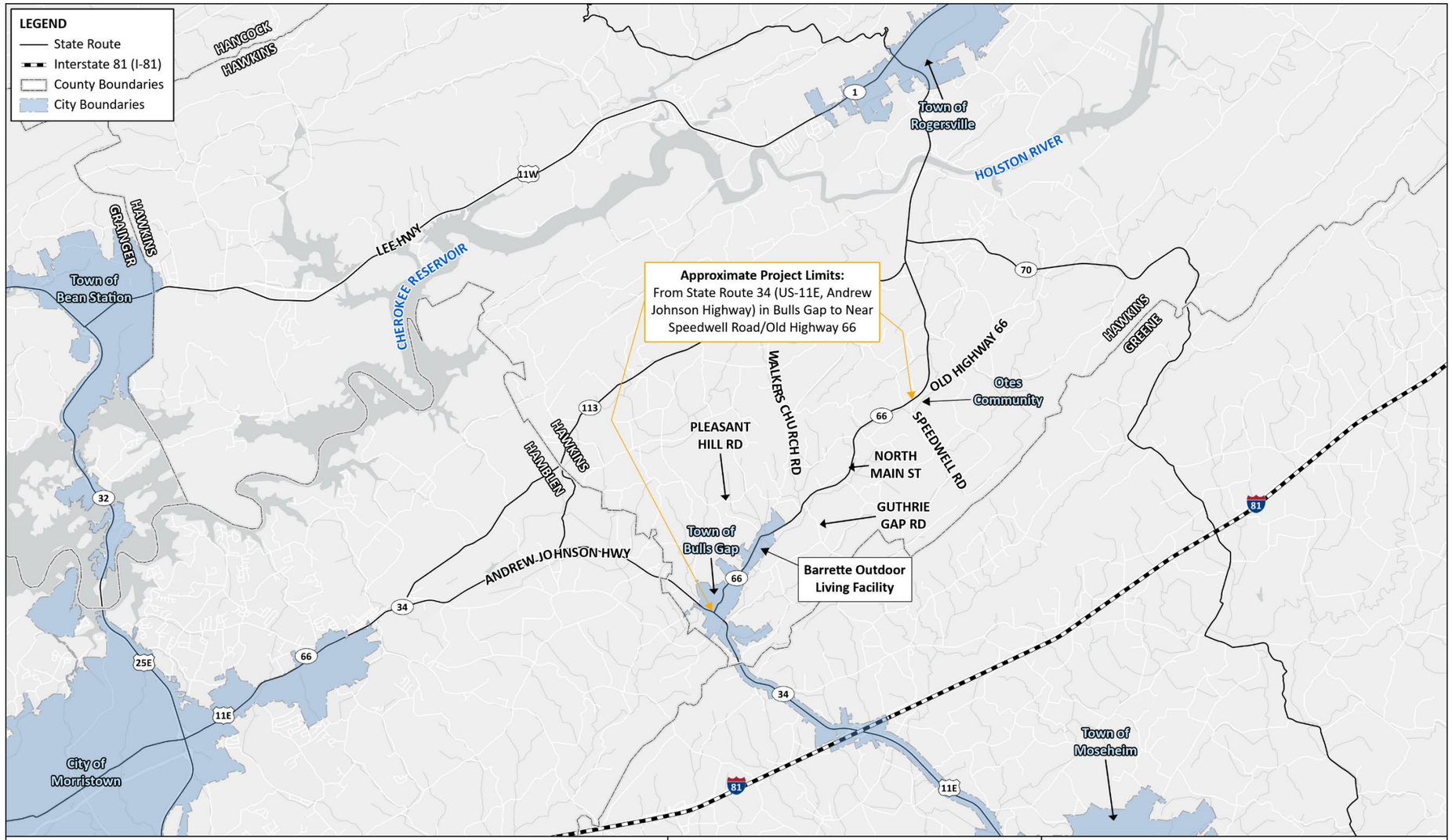
Hawkins County is located in northeast Tennessee and is divided by the Holston River, which traverses the county's entire length (see **Figure 1**). Hawkins County is approximately 487 square miles in size and consists of valleys dotted with farms and pastureland to the foothills of the Appalachians. The county seat is Rogersville, which was founded by Joseph Rogers in 1789. Rogersville was the last Tennessee town founded under the government of North Carolina.

Hawkins County is accessible via four-lane SR-1 (United States Highway (US) 11W, Lee Highway) and connects with SR-32 (US-25E) fifteen miles southwest of the Town of Rogersville. Nearby, Interstate 81 (I-81) parallels SR-1 (US-11W, Lee Highway) in adjacent Greene County. The Town of Bulls Gap, located at the southern end of Hawkins County, was settled in 1794. The town was named for the famous gunsmith, John Bull, who made his home in the gap of the mountains. Today, the town is governed by a Board of Mayor and Aldermen with the town center located at the intersection of SR-34 (US-11E, Andrew Johnson Highway) and SR-66.

[1] *https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-771*

[2] *Cooperating Agencies are Federal or state agencies with jurisdictional by law or special expertise related to environmental issues relevant to the project (23 U.S. Code § 139 - https://www.law.cornell.edu/uscode/text/23/139). See* ***Section 4.2*** *for additional details.*

Figure 1: Project Vicinity Map



PROJECT VICINITY MAP		
PROJECT	**STATE ROUTE 66** From State Route 34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66, Hawkins County, Tennessee, PIN 107579.00	TDOT Department of Transportation

1.3. Project Background

In 2006, TDOT completed a Transportation Planning Report (TPR)[3] which analyzed existing and projected traffic data and determined the feasibility of proposed improvements along an approximately 5.3-mile[4] segment of SR-66 from SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to the Otes Community[5] in Hawkins County. The 2006 TPR evaluated modifying the existing two-lane road to an upgraded two-lane facility which would match the roadway lane and shoulder width geometrics (two 12-foot travel lanes with eight- to 12-foot shoulders) of the section of SR-66 from the Otes Community to the Town of Rogersville. As part of the 2006 TPR, four options were considered: Option A, Option B, Option C, and the No-Build Option. The 2006 TPR recommended that one of the build options (Option A, Option B, or Option C) be implemented, but did not clearly specify a preference and stated the decision for which option to implement would be based on concurrence from the community and upon further review of both environmental and design data.

Refer to **Section 2.1** for a detailed description of each option described in the 2006 TPR as well as a description of the range of alternatives under consideration in this EA.

Based on the 2006 TPR, the TDOT 2007-2009 Multi-Modal Work Program[6] identified the section of SR-66 from SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to the Otes Community as a substandard rural highway and provided the initial funding for the proposed project's planning, environmental, and preliminary engineering studies.

Following completion of the 2006 TPR, a set of Right-of-Way Plans (dated 10/02/2019) was developed for the section of SR-66 from SR-34 (US-11E, Andrew Johnson Highway) in Bulls Gap to near[7] Speedwell Road/Old Highway 66. TDOT prepared a D-List Categorical Exclusion (CE) based on the Right-of-Way Plans (dated 10/02/2019) to document the potential impacts associated with the proposed improvements, which was approved by the FHWA on May 6, 2020.

Following the completion of the 2020 D-List CE, TDOT and FHWA determined that due to the anticipated number of relocations, the proposed project no longer qualifies as a D-List CE. Therefore, the proposed project is now being developed as an EA.

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[3] *https://www.tn.gov/content/dam/tn/tdot/documents/government-how-do-i-documents/Studies/StatewidePlanning/studies-HawkinsSR66BullsGaptoLM5.3NearOtes-TPR.pdf*

[4] *Since the development of the 2006 TPR, the total proposed project length has increased to approximately 5.70 miles. Refer to the Right-of-Way Plans (dated August 9, 2024), included in **Appendix C**, for more details.*

[5] *Since the development of the 2006 TPR, the proposed project termini have been modified to "From SR-34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66. Refer to the Right-of-Way Plans (dated August 9, 2024), included in **Appendix C**, for more details.*

[6] *Please note that this document is not available online.*

[7] *Please note that the Right-of-Way Plans (dated October 2, 2019) incorrectly listed the termini as "South of Speedwell Road/Old Highway 66". However, the proposed project, as currently proposed, would end near Speedwell Road/Old Highway 66.*

1.4. Need for the Project

The needs for the proposed project have been identified as the following:

1.4.1. Existing Roadway Geometric Deficiencies

SR-66 is classified by TDOT as a Minor Arterial.[8] Within the limits of the proposed project, the existing SR-66 roadway configuration consists of two 10-foot travel lanes (one-lane in each direction), with zero- to six-foot outside shoulders. According to the FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition,[9] it is recommended that a Minor Arterial roadway include 10- to 12-foot lane widths with four- to eight-foot outside shoulders. The existing SR-66 roadway configuration within the limits of the proposed project does not meet current design standards for a Minor Arterial roadway.

The existing SR-66 roadway traverses over hilly terrain with frequent sharp curves in the roadway alignment, resulting in poor passing and stop sight distances. These conditions, along with the narrow outside shoulders, also present a potential safety concern for vehicles seeking refuge in an emergency. Additionally, vehicles trying to access local roads from SR-66 are limited by the lack of a two-way left-turn lane along the corridor. Furthermore, the narrow outside shoulders and lack of sidewalks present a potential safety concern for bicyclists traveling along SR-66 and pedestrians walking to and from businesses, homes, and Bulls Gap School in the Town of Bulls Gap.

1.4.2. Insufficient System Linkage

SR-66 serves as an important system linkage in Hawkins County, connecting the Town of Bulls Gap to the county seat of Rogersville. In addition, SR-66 provides access to SR-1 (US-11W, Lee Highway), which is the only Principal Arterial route in Hawkins County.[10] I-81 is also accessible from SR-66 via SR-34 (US-11E, Andrew Johnson Highway). The existing SR-66 roadway configuration presents a continuity issue as roadway users transition between the previously widened and existing (not widened) segments of the SR-66 roadway from the Town Bulls Gap to the Town of Rogersville.

The Barrette Outdoor Living facility is also located along SR-66 within the limits of the proposed project and is one of the top five employers in Hawkins County (see **Figure 1** for the location of the Barrette Outdoor Living Facility).[11] Truck traffic and employees traveling to and from the Barrette Outdoor Living facility from I-81 or the Town of Rogersville currently experience roadway continuity issues as they transition between the previously widened and existing (not widened) segments of the SR-66 roadway.

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[8] https://www.tn.gov/content/dam/tn/tdot/long-range-planning/maps/updated-functional-class-maps/37HawkinsCounty.pdf

[9] https://www.fhwa.dot.gov/planning/processes/statewide/related/hwy-functional-classification-2023.pdf

[10] https://www.tn.gov/content/dam/tn/tdot/long-range-planning/maps/updated-functional-class-maps/37HawkinsCounty.pdf

[11] https://hawkinstnindustrial.com/index.php?src=gendocs&ref=TopEmployers&category=_existingindustry

1.4.3. Need for Route Redundancy

In conjunction with SR-34 (US-11E, Andrew Johnson Highway) and SR-1 (US-11W, Lee Highway), SR-66 serves as a redundant (alternate) route to I-81, running parallel on the north side of the interstate and connecting the City of Knoxville to the Virginia state line, near Kingsport. In the event of an emergency, traffic from I-81 could be diverted to SR-66. However, as currently configured, SR-66 would face limitations in accommodating diverted I-81 traffic due to existing roadway configuration deficiencies, such as the lack of left-turn lanes and outside shoulders, and existing horizontal and vertical deficiencies, such as sharp curves and limited sight distances. Additionally, drivers diverted onto SR-66 would face roadway continuity issues when transitioning from the previously widened and the existing (not widened) segments of SR-66.

1.4.4. Improve SR-66 Consistent with the Legislative Intent of the "Improving Manufacturing, Public Roads, and Opportunities for a Vibrant Economy" (IMPROVE) Act

The "Improving Manufacturing, Public Roads, and Opportunities for a Vibrant Economy" (IMPROVE) Act[12] was signed into law on April 26, 2017 and went into effect on July 1, 2017. One of the main goals of the IMPROVE Act is *"providing a safe, reliable, and debt-free transportation network… [to] ensure the next generation of Tennesseans will have a robust transportation system"* (Governor Haslam, 2018).[13]

The proposed project has been identified as an IMPROVE Act project and would meet the legislative intent of the IMPROVE Act by improving an important infrastructure facility in Hawkins County.

1.5. Purpose of the Project

The purpose of the proposed project has been identified as the following:

1.5.1. Improve Roadway Geometric Deficiencies

The proposed project would improve the typical section of existing SR-66 to be consistent with current design standards for a Minor Arterial roadway as described in the FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition. Additionally, the proposed project would create a consistent typical section from SR-34 (US-11E, Andrew Johnson Highway) in the Town Bulls Gap to the Town of Rogersville. Furthermore, the existing horizontal and vertical deficiencies, such as sharp curves, limited sight distances, and inadequate widths of shoulders, would be corrected through the proposed improvements to SR-66.

Vehicles seeking refuge in an emergency would benefit from improvements to passing and stop sight distances and wider outside shoulders. Additionally, vehicles trying to access local roads from SR-66 would benefit from the addition of a two-way left-turn lane along portions of the roadway. Furthermore, bicyclists and pedestrians would benefit from wider outside shoulders and the addition of sidewalks in the Town of Bulls Gap.

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[12] *https://comptroller.tn.gov/content/dam/cot/orea/advanced-search/2017/2017_OREA_IMPROVEAct.pdf*

[13] *https://www.tn.gov/former-governor-haslam/news/2018/1/4/haslam-announces-major-awarding-of-improve-act-transportation-projects--largest-bidding-process-in-state-history.html*

1.5.2. Improve System Linkage

Improvements to SR-66 would create a consistent typical section along SR-66 from SR-34 (US-11E, Andrew Johnson Highway) to the county seat of Rogersville, facilitating a more efficient connection for traffic traveling from the Town of Bulls Gap to the Town of Rogersville, as well as travelers accessing SR-1 (US-11W, Lee Highway) and I-81. Commuter and truck traffic traveling to and from the Barrette Outdoor Living facility would also benefit from a more efficient roadway due to the consistent typical section.

1.5.3. Support Route Redundancy

In the event of an emergency, traffic from I-81 may be diverted to SR-66. An improved SR-66 roadway, which includes left-turn lanes along portions of the corridor and outside shoulders along the entire corridor, could better accommodate traffic being diverted from I-81 as the typical section would meet the design standards of a Minor Arterial roadway as described in the FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition.

1.5.4. Meet the Legislative Intent of the "Improving Manufacturing, Public Roads, and Opportunities for a Vibrant Economy" (IMPROVE) Act

The proposed project would meet the legislative intent of the IMPROVE Act by improving an important infrastructure facility in Hawkins County.

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2. Chapter 2 – Alternatives

The NEPA requires that agencies proposing a major federal action explore various ways that the project's purpose and need could be met. This chapter describes the alternative development process and provides detailed descriptions of the No-Build Alternative and Build Alternative carried forward for evaluation in this EA.

2.1. Development of Design Options

As noted in **Section 1.3**, the 2006 TPR originally considered four design options (including a No-Build option), which are summarized below:

- **No-Build Option** - The No-Build Option would retain the existing state route and roadway configuration throughout the SR-66 project area except for those modifications to the roadway network that have been programmed and approved for implementation, as identified in TDOT's 25-Year Long Range Transportation Policy Plan,[14] State Transportation Improvement Program (STIP),[15] and the TDOT 10-Year Project Plan[16] and would allow for routine maintenance and safety upgrades.
- **Option A** – All proposed improvements would be concentrated generally along the existing SR-66 corridor, shifting from side to side in some areas and possibly aligning on new location for short segments to minimize impacts to homes, businesses, and/or environmental resources.
- **Option B** – The proposed roadway would be aligned on new location west of the Town of Bulls Gap from SR-34 (US-11E, Andrew Johnson Highway) to near Goan Drive to avoid impacts to residential and commercial properties in the Town of Bulls Gap. This option would share the same alignment as Option A from near Goan Drive to the Otes Community.
- **Option C** – The proposed roadway would be aligned on new location east of the Town of Bulls Gap from SR-34 (US-11E, Andrew Johnson Highway) to near Shepherd Drive to avoid impacts to residential and commercial properties in the Town of Bulls Gap. This option would share the same alignment as Option A from near Shepherd Drive to the Otes Community. The segment on new location would require a crossing of the Norfolk Southern Railroad tracks.

As noted within **Section 1.3**, the 2006 TPR recommended that one of the build options (Option A, Option B, or Option C) be implemented, but did not clearly specify a preference and stated the decision for which option to implement would be based on concurrence from the community and upon further review of both environmental and design data.

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[14] https://www.tn.gov/tdot/long-range-planning-home/25-year-transportation-policy-plan.html

[15] https://www.tn.gov/tdot/program-development-and-administration-home/program-development-and-administration-state-programs.html

[16] https://www.tn.gov/tdot/build-with-us.html

Following preparation of the 2006 TPR, a Historic/Architectural Assessment and Documentation of Effect was prepared for the proposed project in 2013. The 2013 Historic/Architectural Assessment and Documentation of Effect charted over 45 historic properties, three of which (Newton Farm, Shadowland Farm, and Berry Farm) were eligible for listing in the National Register of Historic Places (NRHP).[17]

Due to anticipated impacts to the three NRHP properties (Newton Farm, Shadowland Farm, and Berry Farm), TDOT discussed two design options within the 2013 Historic/Architectural Assessment and Documentation of Effect. The 2013 Historic/Architectural Assessment and Documentation of Effect considered Option A (which is consistent with Option A as identified in the 2006 TPR) and a newly developed Option B (which is an avoidance option that was considered in order to avoid impacts related to two of the NRHP eligible properties, Shadowland Farm and Berry Farm, in the SR-66 project area).[18]

- **Option A** – All improvements would be concentrated generally along the existing SR-66 corridor, shifting from side to side in some areas and possibly aligning on new location for short segments to minimize impacts to homes, businesses, and/or environmental resources.
- **Option B** – This option would share the same alignment as Option A from SR-34 (US-11E, Andrew Johnson Highway) to north of Goan Drive. The proposed roadway would then be shifted onto new location north of existing SR-66 to avoid impacts to two of the NRHP eligible properties, Shadowland Farm and Berry Farm. This option would then transition back to the same alignment as Option A south of Rong Road.

In 2016, the contributing support building within the National Register Boundary of the Berry Farm was destroyed through unknown means and is no longer extant. In 2016, TDOT held a Design Public Meeting and received public feedback against Option B (as identified in 2013 Historic/Architectural Assessment and Documentation of Effect).[19] Following publication of the 2013 Historic/Architectural Assessment and Documentation of Effect, the identified historic resources within the Newton Farm that were eligible for listing on the NRHP were demolished. This finding is documented within the 2024 Updated Historic Architecture Assessment of SR-66.[20]

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*[17] Refer to the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum, included in **Appendix G**, for more details regarding the historic preservation studies completed for the proposed project.*

[18] Please note that Option B as identified in the 2013 Historic/Architectural Assessment and Documentation of Effect is different from Option B as identified in the 2006 TPR.

*[19] See **Chapter 4** as well as the SR-66 Public Engagement Summary, included in **Appendix L**, for additional details related to the November 2016 Design Public Meeting.*

*[20] Refer to the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum, included in **Appendix G**, for more details regarding the Newton Farm.*

Following consideration of all five aforementioned design options,[21] TDOT has selected Option A (as identified in the 2006 TPR as well as the 2013 Historic/Architectural Assessment and Documentation of Effect) as the Build Alternative for detailed study in this EA. Option A (as identified in the 2006 TPR as well as the 2013 Historic/Architectural Assessment and Documentation of Effect) would generally utilize the existing SR-66 roadway, except for minor alignment shifts to correct roadway geometric deficiencies, and would minimize the amount of right-of-way anticipated to be acquired compared to the other design options under previous consideration.

The public opposition to Option B (as identified in the 2013 Historic/Architectural Assessment and Documentation of Effect) and the destruction of the Berry Farm's contributing structure also factored into TDOT's decision to move forward with Option A as the Build Alternative.

Refer to **Figure 2** for a visual depiction of the previous design options that were under consideration.

2.2. Range of Alternatives Under Consideration

As described in **Section 2.1**, design options of alternatives were developed in a manner that took into account engineering, social, and environmental considerations. Comments received in response to coordination with federal, state, and local agencies and other interested parties as well as comments received in response to engagement with the public were considered in the development of design options of alternatives. Agency coordination and public outreach are discussed further in **Chapter 4**. The alternatives under consideration in this EA are discussed in subsequent sections below.

The evaluation of one Build Alternative in detail in this EA is consistent with the FHWA's Technical Advisory T6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents.[22] A No-Build Alternative is also under consideration and is described in **Section 2.3**.

2.3. No-Build Alternative

The No-Build Alternative has been retained for detailed study and serves as a benchmark for comparison against the Build Alternative. The No-Build Alternative would retain the existing state route and roadway configuration throughout the SR-66 project area except for those modifications to the roadway network that have been programmed and approved for implementation, as identified in TDOT's 25-Year Long Range Transportation Policy Plan, State Transportation Improvement Program (STIP), and the TDOT 10-Year Project Plan and would allow for routine maintenance and safety upgrades.

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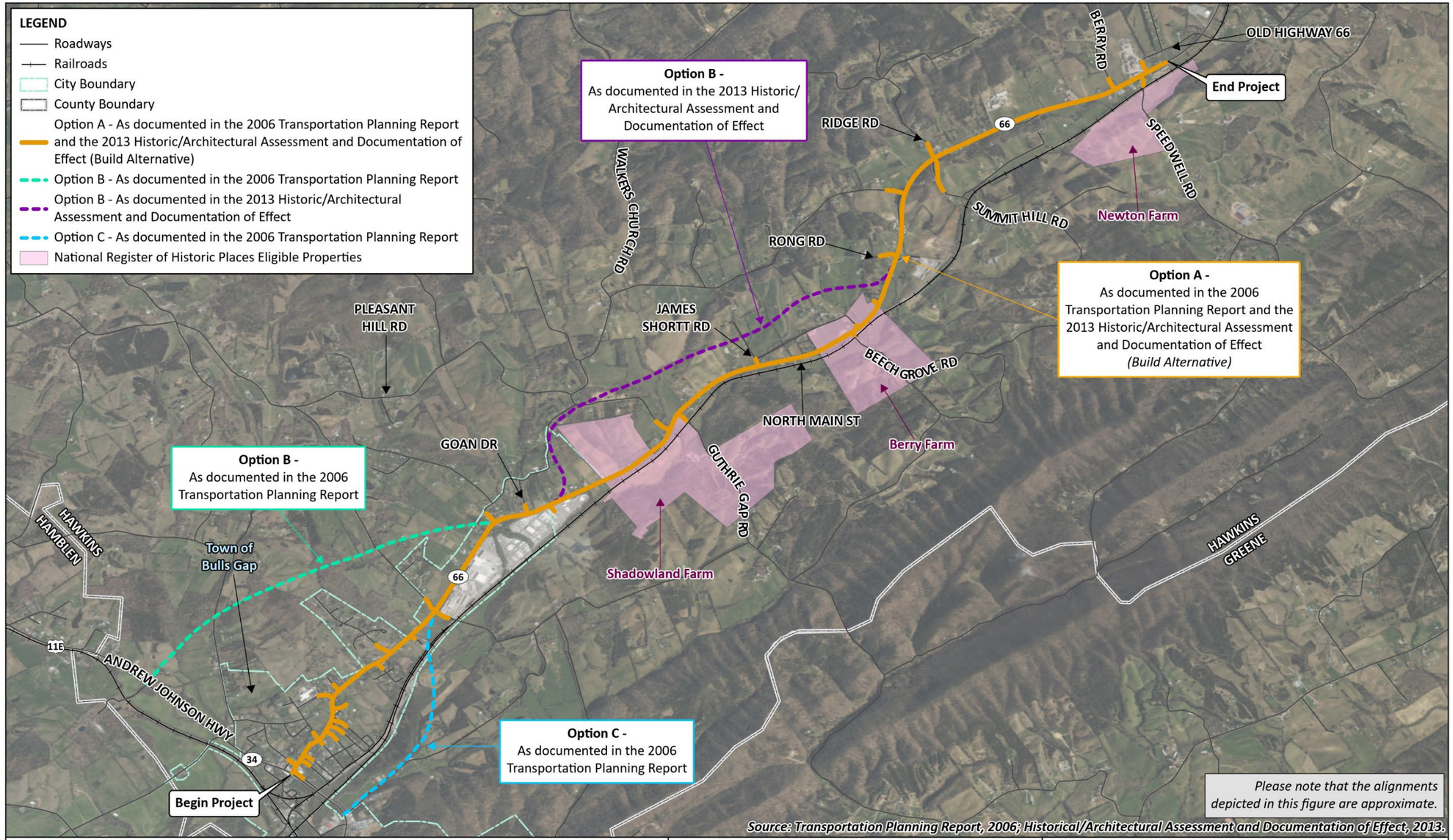
[21] *The five aforementioned design options include the four design options discussed in the 2006 TPR (including the No-Build option) as well as the additional Option B, the avoidance option discussed in the 2013 Historic/Architectural Assessment and Documentation of Effect.*

[22] *https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx*

Figure 2: Design Options Under Previous Consideration



DESIGN OPTIONS UNDER PREVIOUS CONSIDERATION	
PROJECT	**STATE ROUTE 66** From State Route 34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66, Hawkins County, Tennessee, PIN 107579.00

TN TDOT Department of Transportation

2.4. Build Alternative

2.4.1. Description of the Build Alternative

According to the Right-of-Way Plans (dated August 9, 2024), which serve as the basis of this EA, the Build Alternative would generally follow the existing SR-66 roadway alignment, except in locations where minor alignment shifts are needed to correct roadway geometric deficiencies. The Build Alternative would also widen the existing two-lane roadway configuration (which currently consists of one 10-foot-wide lane in each direction) to include the following (see **Figure 3**):

- Two 12-foot travel lanes (one travel lane in each direction) and paved shoulders four- to ten-feet in width.
- An intermittent 12-foot-wide two-way left-turn lane from SR-34 (US-11E, Andrew Johnson Highway) to north of Goan Drive and from north of Berry Road to near Speedwell Road/Old Highway 66.
- Five-foot wide sidewalks from SR-34 (US-11E, Andrew Johnson Highway) to north of Goan Drive.
- Intermittent curb and gutter.
- Guardrail, as required.

Once completed, the Build Alternative would provide a consistent typical section along SR-66 from SR-34 (US-11E, Andrew Johnson Highway) to the county seat of Rogersville, as well as provide a link from Rogersville to I-81. The total proposed project length is approximately 5.70 miles.

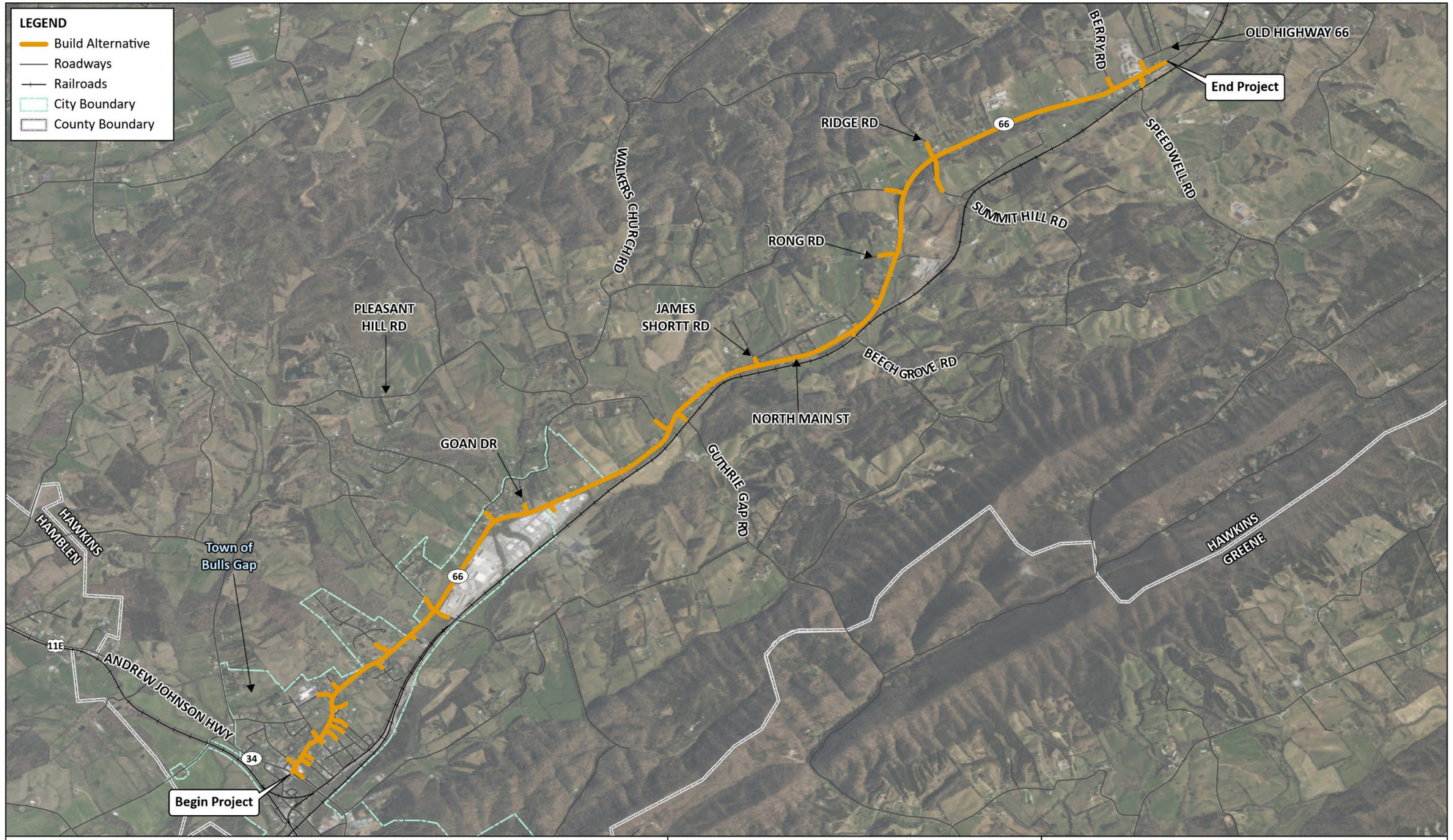
A detailed description of the proposed typical sections being considered as part of the Build Alternative is included in **Section 2.4.2** below.

The Build Alternative is included in the Fiscal Year (FY) 2023-2026 STIP as STIP # 23372066043.[23] A copy of the STIP page is included in **Appendix B**.

The Right-of-Way Plans (dated August 9, 2024) are included in **Appendix C.**

[23] *https://www.tn.gov/content/dam/tn/tdot/programdevelopment/2023-2026-stip-draft/Tennessee%20STIP%202023-2026%20Final_R.pdf*

Figure 3: Project Location Map



2.4.2. Proposed Typical Sections of the Build Alternative

As noted in **Section 2.4.1**, the Build Alternative would generally follow the existing SR-66 roadway alignment, except in locations where minor alignment shifts are needed to correct roadway geometric deficiencies. The Build Alternative's typical section would also widen the existing two-lane roadway configuration (which currently consists of one 10-foot-wide lane in each direction) but does vary slightly in configuration as the driver moves through the SR-66 project area. In total, there are eight proposed typical sections, which are described in further detail below and presented visually in **Figure 4** and **Figure 5**. Refer to the Right-of-Way Plans (dated August 9, 2024), included in **Appendix C**, for more details regarding the proposed typical sections.

TYPICAL SECTION #1

Typical Section #1 would extend from the intersection with SR-34 (US-11E, Andrew Johnson Highway) to north of Goan Drive. The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), one 12-foot two-way left-turn lane, four-foot shoulders, two-foot curb and gutter, and five-foot sidewalks.

TYPICAL SECTION #2

Typical Section #2 would extend from north of Goan Drive to north of Pleasant Hill Road. The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), six-foot shoulders, two-foot curb and gutter, and seven-foot utility strips. The shoulder width would vary from four to 10 feet in some areas to accommodate transitions between typical sections.

TYPICAL SECTION #3

Typical Section #3 would extend from north of Pleasant Hill Road to north of Guthrie Gap Road. The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), 10-foot shoulders, two-foot curb and gutter, and seven-foot utility strips.

TYPICAL SECTION #4

Typical Section #4 would extend along the following segments of SR-66:

- From north of Guthrie Gap Road to north of James Shortt Road;
- From south of Rong Road to approximately 420 feet south of Summit Hill Road/Ridge Road;
- From approximately 175 feet south of Summit Hill Road/Ridge Road to north of Berry Road; and
- From north of Speedwell Road/Old Highway 66 to the end of the proposed project.

The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), 10-foot shoulders, and guardrail as required.

TYPICAL SECTION #5

Typical Section #5 would extend along the following segments of SR-66:

- From north of James Shortt Road to south of Beech Grove Road; and
- From north of Beech Grove Road to south of Rong Road.

The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), six-foot shoulders, and guardrail as required. The shoulder width would vary from six to 10 feet in some areas to accommodate transitions between typical sections.

TYPICAL SECTION #6

Typical Section #6 would extend from south of Beech Grove Road to north of Beech Grove Road. The Build Alterative would consist of two 12-foot travel lanes (one travel lane in each direction), six-foot shoulders, with two-foot curb and gutter and a seven-foot utility strip on the southbound side, and guardrail as required on the northbound side.

TYPICAL SECTION #7

Typical Section #7 would extend from approximately 420 feet south of Summit Hill Road/Ridge Road to approximately 175 feet south of Summit Hill Road/Ridge Road. The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), 10-foot shoulders, with guardrail on the southbound side, and two-foot curb and gutter on the northbound side.

TYPICAL SECTION #8

Typical Section #8 would extend from north of Berry Road to near Speedwell Road/Old Highway 66. The Build Alternative would consist of two 12-foot travel lanes (one travel lane in each direction), one 12-foot two-way left-turn lane, 10-foot shoulders, and guardrail as required. The two-way left-turn lane would vary from zero to 12 feet in some areas to accommodate transitions between typical sections.

2.5. Traffic Control During Construction

If the Build Alternative is constructed, traffic control would occur in the following stages:

- **Stage 1:** Traffic would continue to flow in both directions of travel on existing SR-66 while temporary pavement of varying widths is constructed on either side of the existing roadway.
- **Stage 2:** Traffic would transition to the newly constructed temporary pavement section on the south side of the existing roadway. Construction of the Build Alternative would be completed on the north side of the existing roadway during Stage 2.

- **Stage 3:** Traffic would transition to the newly constructed Build Alternative on the north side of the existing roadway. Construction of the Build Alternative would be completed on the south side of the existing roadway during Stage 3. For areas where construction is needed on the center of the existing roadway, construction would be split into the following two sub-stages:
    - **Stage 3A:** Traffic would be split into one travel lane on the north side of the existing roadway and one travel lane on the south side of the existing roadway. Construction of the Build Alternative would be completed on the center of the existing roadway.
    - **Stage 3B:** Traffic would transition to the newly constructed Build Alternative on the north side of the existing roadway. Construction of the Build Alternative would be completed on the south side of the existing roadway.

Following completion of Stage 3, construction of the Build Alternative would be completed, and traffic would flow as normal. The traffic control plans are included within the Right-of-Way Plans (dated August 9, 2024), which are included in **Appendix C**.

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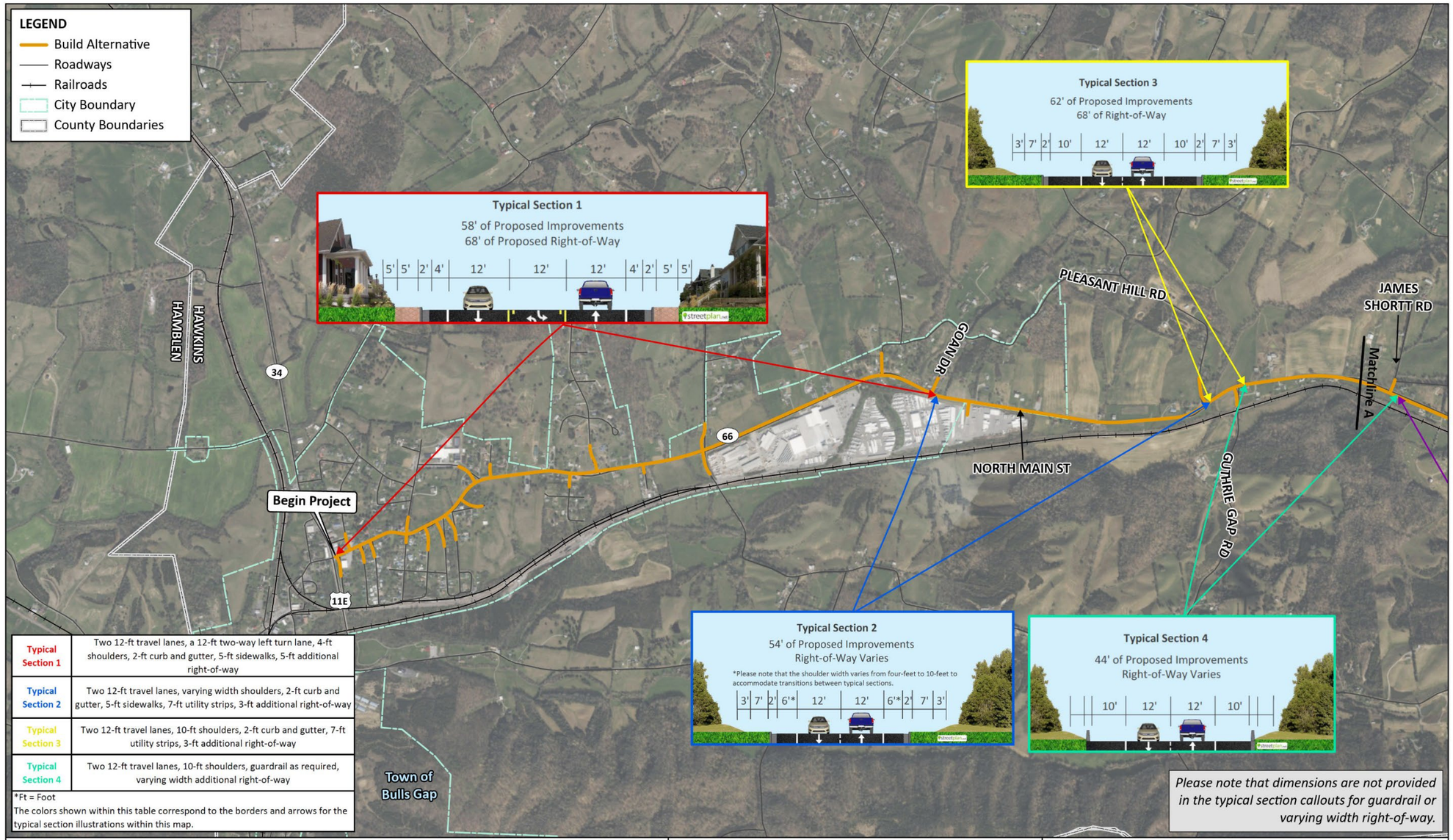
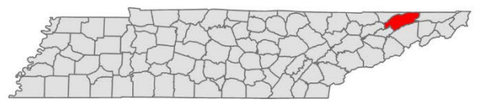
Figure 4: Project Location and Typical Section Map - Page 1



PROJECT LOCATION AND TYPICAL SECTION MAP - PAGE 1

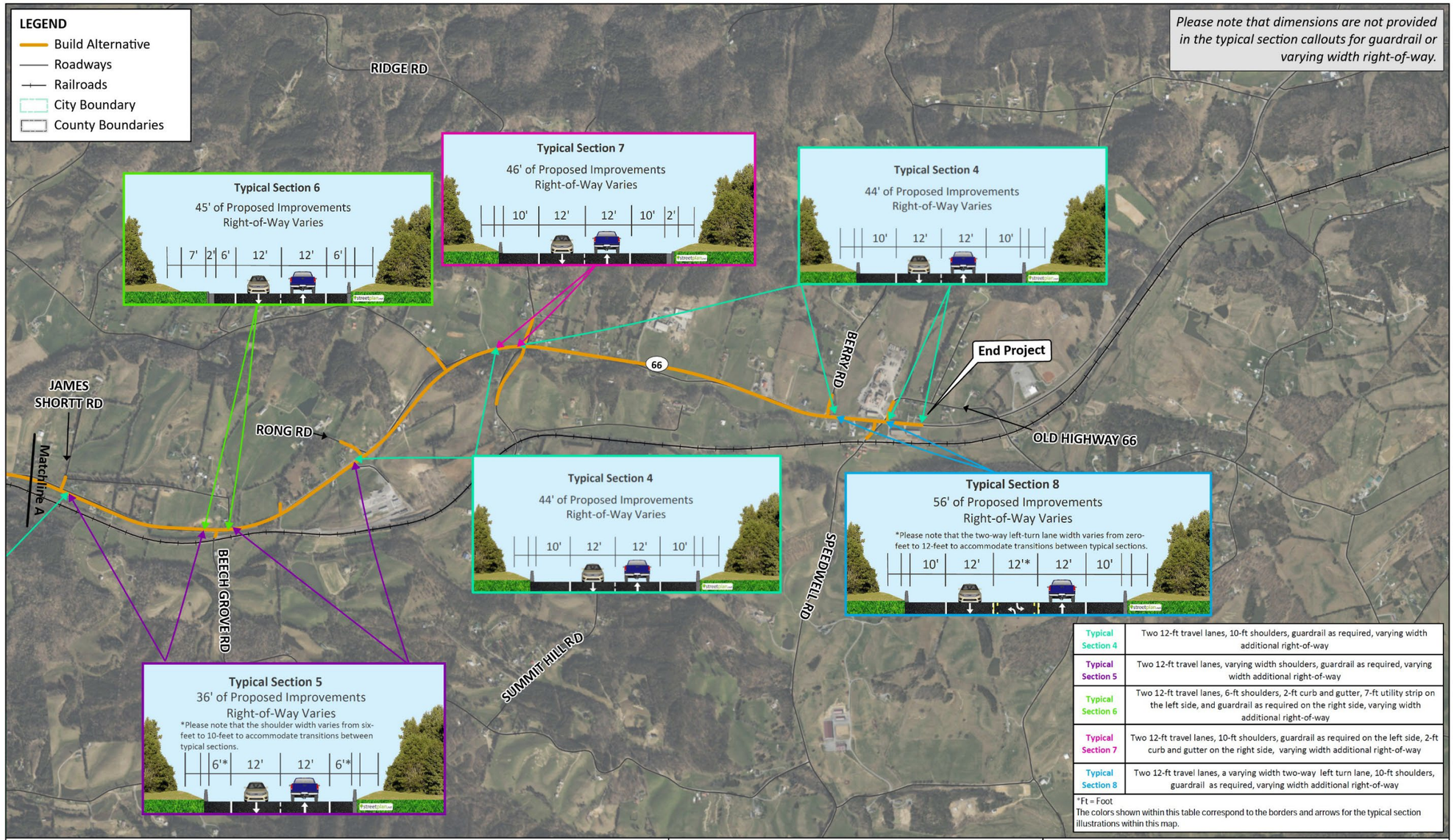
PROJECT	**STATE ROUTE 66** From State Route 34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66, Hawkins County, Tennessee, PIN 107579.00



0 0.25 0.5 Miles

TN TDOT Department of Transportation

Figure 5: Project Location and Typical Section Map - Page 2



PROJECT LOCATION AND TYPICAL SECTION MAP - PAGE 2	
PROJECT	**STATE ROUTE 66** From State Route 34 (US-11E, Andrew Johnson Highway) in Bulls Gap to Near Speedwell Road/Old Highway 66, Hawkins County, Tennessee, PIN 107579.00

2.6. Local Road Access

The construction of the Build Alternative would include improvements to the following local roads that tie into the existing SR-66 roadway:

- Couch Street
- Elmwood Avenue
- Quillen Avenue
- York Street
- Wayland Boulevard/Hill Avenue
- Magnolia Avenue
- Melrose Avenue
- Willow Avenue
- Hillcrest Lane
- Allen Drive
- Kite Street
- Glenwood Avenue
- Easy Street
- Harmon Street
- Whitehorn Road/Shepherd Drive
- Meadowview Road
- Goan Drive
- Pleasant Hill Road
- Guthrie Gap Road
- James Shortt Road
- Beech Grove Road
- Old Highway Road
- Rong Road
- Wolfe Branch Road
- Summit Hill Road/Ridge Road
- Berry Road
- Speedwell Road/Old Highway 66

Improvements are also proposed at various driveway location along the length of the Build Alternative.

Access to the local roads and driveways would be maintained throughout the duration of construction, and no detours would be needed. See **Section 2.5** for additional details regarding access during construction. Refer to the Right-of-Way Plans (dated August 9, 2024), included in **Appendix C**, for more details regarding the proposed improvements and typical sections for local roads and driveways.

2.7. Access Control Under the Build Alternative

The Build Alternative would be constructed as a “No Access Control” facility. This means that connections to SR-66 are provided at both at-grade intersections and private driveways, and there are no physical restrictions, i.e., a control of access fence.

2.8. Other TDOT Projects in the Vicinity

TDOT has planned and programmed approximately 22 additional transportation projects within the vicinity of the SR-66 project area. Refer to the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum in **Appendix D** for additional information and details regarding these planned and programmed TDOT projects. **Table 1** and **Figure 6** identify the other planned and programmed TDOT transportation projects in the vicinity of the SR-66 project area.

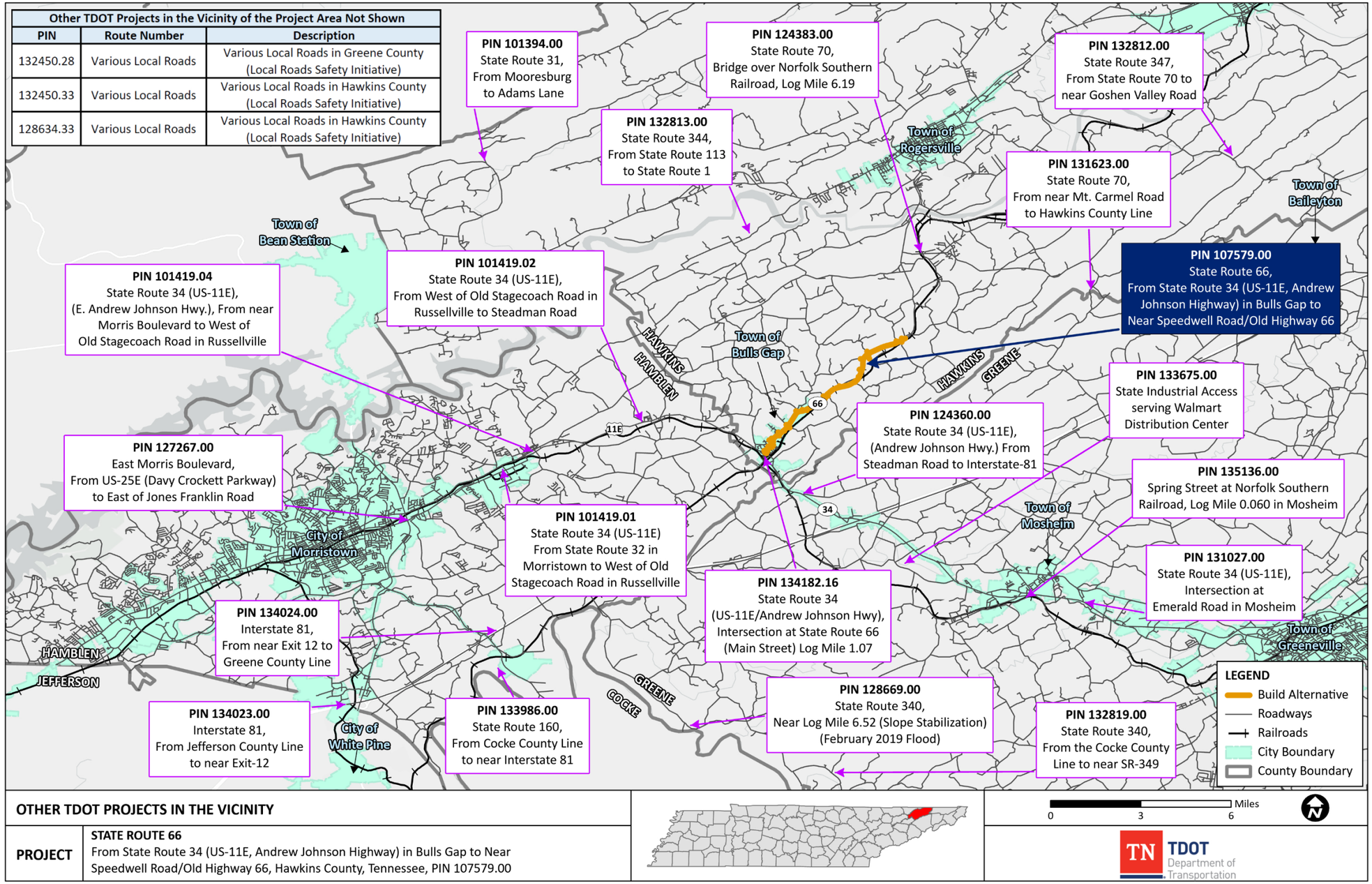
Table 1: Other TDOT Projects in the Vicinity[24]

TDOT Project Identification Number (PIN)[25]	County	Route Number	Description	Type of Work
101419.01	Hamblen	SR-34 (US-11E)	From SR-32 in Morristown to West of Old Stagecoach Road in Russellville	Preliminary Engineering
101419.02	Hamblen	SR-34 (US-11E)	From West of Old Stagecoach Road in Russellville to Steadman Road (Expedited Project Delivery (EPD)) (Improve Act (IA))	Construction
101419.04	Hamblen	SR-34 (US-11E)	(E. Andrew Johnson Highway (Hwy.)), From near Morris Boulevard (Blvd) to West of Old Stagecoach Road in Russellville (IA)	Construction
101394.00	Hawkins	SR-31	From Mooresburg to Adams Lane (EPD) (IA) (Transportation Modernization Act (TMA))	Reconstruction
124360.00	Hamblen, Hawkins, Greene	SR-34 (US-11E)	(Andrew Johnson Hwy.) From Steadman Road to Interstate 81 (I-81) (IA)	Widening
132812.00	Hawkins	SR-347	From SR-70 to near Goshen Valley Road	Resurfacing
132813.00	Hawkins	SR-344	From SR-113 to SR-1	Resurfacing
127267.00	Hamblen	N/A	East Morris Boulevard, From US-25E (Davy Crockett Parkway) to East of Jones Franklin Road	Resurface & Safety
133986.00	Hamblen	SR-160	From Cocke County Line to near I-81	Resurfacing
134023.00	Hamblen	I-81	From Jefferson County Line to near Exit-12	Resurfacing
134024.00	Hamblen	I-81	From near Exit 12 to Greene County Line	Resurfacing
131623.00	Greene	SR-70	From near Mount (Mt.) Carmel Road to Hawkins County Line	Resurfacing
132819.00	Greene	SR-340	From the Cocke County Line to near SR-349	Resurfacing
131027.00	Greene	SR-34 (US-11E)	(US-11E), Intersection at Emerald Road in Mosheim	Safety
124383.00	Hawkins	SR-70	Bridge over Norfolk Southern Railroad, Log Mile (LM) 6.19 (IA)	Bridge Replacement
134182.16	Hawkins	SR-34 (US-11E)	(US-11E/Andrew Johnson Hwy), Intersection at SR-66 (Main Street) LM 1.07	Signalization
128669.00	Greene	SR-340	Near LM 6.52 (Slope Stabilization) (February 2019 Flood)	Safety
133675.00	Greene	SIA (State Industrial Access)	State Industrial Access serving Walmart Distribution Center	Reconstruction
135136.00	Greene	N/A	Spring Street at Norfolk Southern Railroad, LM 0.060 in Mosheim	Railroad Crossing Improvement
128634.33	Hawkins	N/A	Various Local Roads in Hawkins County (Local Roads Safety Initiative)	Safety
132450.28	Greene	N/A	Various Local Roads in Greene County (Local Roads Safety Initiative)	Safety
132450.33	Hawkins	N/A	Various Local Roads in Hawkins County (Local Roads Safety Initiative)	Safety

[24] Information in this table is based on the Fiscal Year 2023-2026 STIP and associated STIP Amendments, the Tennessee STIP Project Viewer, the TDOT 10-Year Project Plan, the TDOT Program/Project/Resource Management System (PPRM), and non-STIP safety projects identified by TDOT's Traffic Design Division via email September 17, 2024. Additional information on STIP projects is available at https://www.tn.gov/tdot/program-development-and-administration-home/program-development-and-administration-state-programs.html (Accessed November 25, 2024) and information on TDOT's 10-Year Project Plan is available at https://www.tn.gov/tdot/build-with-us.html (Accessed December 5, 2024). Please note that no projects listed in the Fiscal Year 2023-2026 STIP were identified within the vicinity of the SR-66 project area.

[25] PIN – Project Identification Number. PINs are used by TDOT to identify and track projects.

Figure 6: Other TDOT Projects in the Vicinity



2.9. Ability of Alternatives to Meet Purpose and Need

This section discusses the ability of the alternatives under study in this EA to meet the purpose and need for the project. See **Table 2** for a summary of this analysis. For additional detail regarding the Purpose and Need of the project, see **Chapter 1**.

Table 2: Ability of Alternatives to Meet Purpose and Need

Need	Purpose	No-Build Alternative	Build Alternative
Existing Roadway Geometric Deficiencies	Improve Roadway Geometric Deficiencies	Under the No-Build Alternative, SR-66, within the project limits, would remain as it currently exists other than routine maintenance as needed. It would not meet the need to improve the existing roadway geometric deficiencies or the purpose of the project to improve the roadway to meet current design standards.	The Build Alternative would make improvements to SR-66 within the proposed project limits to be consistent with the FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition for a Minor Arterial roadway. The Build Alternative would include widening the existing typical section to include a two-way left-turn lane along some portions of the corridor, and wider outside shoulders along the entire corridor, creating a consistent typical section from SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to the Town of Rogersville. The Build Alternative would also correct existing horizontal and vertical deficiencies, such as sharp curves, limited sight distances, and inadequate widths of shoulders. The addition of a separate left-turn lane may improve sight distance for turning drivers at the intersection of SR-66 and SR-34 (US-11E, Andrew Johnson Highway). The Build Alternative's proposed widening of the typical section and other improvements such as wider shoulders and guardrail installation may also serve to reduce lane departure and other fixed object or non-vehicular crashes along the entire corridor.[26] The Build Alternative would also provide vehicles seeking refuge in an emergency and vehicles trying to access local roads from SR-66 with improved shoulders. Furthermore, the Build Alternative would also include paved shoulders four- to ten-feet in width, which would provide additional accommodations for bicyclists on SR-66 as well as provide sidewalks in the Town of Bulls Gap for pedestrians. The addition of sidewalks for pedestrians and wider shoulders for bicyclists is consistent with the Rural Regional Transportation Plan (First Tennessee Rural Planning Organization (RPO)) (Adopted December 2023) which includes the SR-66 project area.[27] Overall, the Build Alternative would meet the need by improving existing roadway deficiencies and would meet the purpose of improving the roadway to meet current design standards.
Insufficient System Linkage	Improve System Linkage	The No-Build Alternative would not meet the need and purpose to enhance system linkage. Currently, vehicles accessing SR-1 (US-11W, Lee Highway) and I-81 from SR-66, as well as commuters and truck traffic accessing the Barrette Outdoor Living facility, would continue to use the existing SR-66 roadway, which lacks a consistent typical section from SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to the county seat of Rogersville and is limited by existing roadway configuration deficiencies.	The Build Alternative would meet the need and purpose of the project by creating a consistent typical section from SR-34 (US-11E, Andrew Johnson Highway) in the Town of Bulls Gap to the county seat of Rogersville and by correcting existing roadway configuration deficiencies. This would create a more efficient drive for vehicles accessing SR-1 (US-11W, Lee Highway) and I-81 from SR-66, as well as commuters and truck traffic accessing one of the top five employers in Hawkins County (Barrette Outdoor Living), by providing a more consistent typical section.

[26] *See the SR-66 Traffic Capacity and Safety Analysis Technical Memorandum, included in **Appendix A**, for more details.*

[27] *https://www.tn.gov/content/dam/tn/tdot/long-range-planning/oct/1-First-TN-12-6-2023.pdf*

Need	Purpose	No-Build Alternative	Build Alternative
Need for Route Redundancy	Support Route Redundancy	Under the No-Build Alternative, SR-66, as currently configured, would face limitations in accommodating diverted I-81 traffic due to existing roadway configuration deficiencies, such as the lack of left-turn lanes and outside shoulders, and existing horizontal and vertical deficiencies, such as sharp curves and limited sight distances. Additionally, drivers diverted onto SR-66 would face roadway continuity issues when transitioning from the previously widened and the existing (not widened) segments of SR-66.	Under the Build Alternative, the need and purpose for route redundancy would be met because in the event I-81 traffic is diverted, an improved SR-66 roadway which includes left-turn lanes along portions of the corridor and outside shoulders along the entire corridor could better accommodate traffic as the typical section would meet the design standards of a Minor Arterial roadway as described in the FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition.
Improve SR-66 Consistent with the Legislative Intent of the IMPROVE Act	Meet the Legislative Intent of the IMPROVE Act	The No-Build Alternative would not meet the intent of the IMPROVE Act since it would not make any improvements to SR-66.	The Build Alternative would meet the intent of the IMPROVE Act by improving SR-66, which is considered an important infrastructure facility in Hawkins County.

2.10. Logical Termini and Independent Utility

FHWA regulations (23 CFR § 771.111(f))[28] outline three criteria for selecting the end points of a transportation project as follows:

- Connect logical termini and be of sufficient length to address environmental matters on a broad scope;
- Have independent utility or independent significance (i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made); and
- Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

2.10.1. Logical Termini

For the Build Alternative, logical termini have been identified based on connections to traffic generators on existing state routes as well as the location of previous improvements along SR-66. Logical termini endpoints are identified as follows:

- Western Terminus – The intersection of SR-66 and SR-34 (US-11E, Andrew Johnson Highway).
  - The western terminus was chosen where existing SR-66 intersects with SR-34 (US-11E, Andrew Johnson Highway), which serves as a major traffic generator.
- Eastern Terminus – Near Speedwell Road/Old Highway 66
  - A portion of existing SR-66, from near Speedwell Road/Old Highway 66 to the Town of Rogersville, was previously widened and currently consists of two 12-foot travel lanes (one travel lane in each direction) with eight- to 12-foot outside shoulders. The improved typical section is inconsistent with the existing typical section of SR-66 within the limits of the Build Alternative. Improvements under the Build Alternative would modify the existing typical section of SR-66 to be consistent with the previously widened segment of SR-66. Therefore, the eastern terminus was chosen as a tie-in between the previously widened and existing (not widened) segments of SR-66.

[28] *https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-771/section-771.111*

2.10.2. Independent Utility

The Build Alternative demonstrates independent utility because it would not depend on other transportation improvements in the area in order to function and it would not require other transportation projects to be constructed in order to meet the purpose and need for the project. The Build Alternative would be a usable and reasonable expenditure of public funds even if no additional transportation improvements are made.

Regardless of whether other projects in the vicinity are constructed, the Build Alternative would correct existing roadway geometric deficiencies, improve system linkage, support route redundancy, and meet the legislative intent of the IMPROVE Act.

2.10.3. Consideration of Other Reasonably Foreseeable Projects

The Build Alternative would not restrict consideration of alternatives for other reasonably foreseeable transportation improvements. TDOT has planned and programmed approximately 22 additional transportation projects within the vicinity of the SR-66 project area. The Build Alternative would not restrict the consideration of alternatives for any of these projects.

See **Table 1** and **Figure 6** and refer to the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum in **Appendix D** for additional information and details regarding these planned and programmed TDOT projects.

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3. Chapter 3 – Environmental Consequences of the Proposed Action

Social, economic, physical, and natural resources have the potential to be affected during transportation projects. Therefore, existing environmental conditions and potential impacts are important to identify and understand. The following sections inventory and analyze the potential environmental effects associated with the No-Build Alternative and Build Alternative that are under consideration in this EA.

3.1. Type of Effects Analyzed in this Environmental Assessment

Direct effects (impacts) are analyzed in this EA. Direct effects are those caused by the project and occur at the time and place the project is constructed.

Table 3 provides a general list of the social, economic, physical, and natural resources (or "impact categories") identified within the limits of the SR-66 project area. These impact categories were analyzed to determine the potential for significant direct effects resulting from the Build Alternative. In addition, **Table 3** notes where additional information and materials for each impact category can be found.

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Table 3: Presence/Absence of Direct Effects

Impact Categories	Direct Impact Anticipated (Yes/No)	Location of Additional Information
Land Use	Yes	See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum
Farmland	Yes	See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum
Transportation	Yes	See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum
Community Impact and Economic Resources	Yes	See **Appendix E** for the SR-66 Community Impact Assessment, Relocations, and Economic Resource Technical Memorandum
Relocations	Yes	See **Appendix E** for the SR-66 Community Impact Assessment, Relocations, and Economic Resource Technical Memorandum
Air Quality	Yes	See **Appendix F** for the SR-66 Air Quality and Noise Technical Memorandum
Noise	Yes	See **Appendix F** for the SR-66 Air Quality and Noise Technical Memorandum
Historic Architecture	Yes	See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum
Archaeology	No	See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum
Native American Consultation	No	See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum
Section 4(f) Resources	Yes	See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum
Section 6(f) Resources	No	See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum
Natural Resources	Yes	See **Appendix H** for the SR-66 Natural Resources Technical Memorandum
Floodplains	Yes	See **Appendix H** for the SR-66 Natural Resources Technical Memorandum
Visual Quality	Yes	See **Appendix I** for the SR-66 Visual Impact Assessment Technical Memorandum
Hazardous Materials	Yes	See **Appendix J** for the SR-66 Hazardous Materials Technical Memorandum
Construction and Operations	Yes	A separate technical memorandum was not developed for the review of potential construction and operations impacts. Findings are summarized in **Section 3.1.2**.

3.1.1. Direct Effects Associated with the Alternatives Under Consideration

Table 4 describes the potential direct effects (impacts) anticipated for the No-Build Alternative and the Build Alternative for the impact categories (social, economic, physical, and natural resources) located within the SR-66 project area (see **Table 3** for a listing of these impact categories).[29] Where impacts are identified, **Table 4** describes measures to address those impacts (if applicable). **Table 4** also indicates for each impact category whether analysis indicated a potential significant impact as a result of the construction of the Build Alternative.

Additionally, the following resources are not discussed in **Table 4** as these resources are not physically located within the limits of the SR-66 project area and therefore would not be directly impacted by the Build Alternative:

- Airports[30]
- Public Transit[31]
- Section 6(f) Resources
- Wild and Scenic Rivers[32]

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*[29] Please refer to the relevant technical memorandums for each impact category for additional information. See **Table 3** for the location of the various technical memorandums.*

*[30] Airports are discussed in the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum, which can be found in **Appendix D**.*

*[31] Public transit is discussed in the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum, which can be found in **Appendix D**.*

*[32] Wild and scenic rivers are discussed in the SR-66 Natural Resources Technical Memorandum, which can be found in **Appendix H**.*

Table 4: Potential Direct Impacts

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Land Use – See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum				
Direct Conversion of Land to a Transportation Use	No Effect	Within the limits of the Build Alternative, approximately 102.52 acres of land would be converted to a transportation use.[33] This amount may be minimized as the proposed project moves through the project development process.	Proposed right-of-way and easement amounts associated with the Build Alternative may be additionally minimized as the proposed project moves through the project development process. Therefore, direct conversion of land to a transportation use may be reduced.	No Significant Impact
Existing Land Use	No Effect	The Build Alternative would convert approximately 102.52 acres of land to a transportation use, which would be inconsistent with the existing agricultural, commercial, industrial, residential, and public/semi-public identified land uses within the SR-66 project area. However, this conversion would occur predominantly along the existing SR-66 alignment. Therefore, the impacts to the existing land uses along the Build Alternative are anticipated to be minimal.	Continued coordination among TDOT, Hawkins County, and the Town of Bulls Gap is necessary to ensure that the Build Alternative is consistent with existing land use to the extent possible.	No Significant Impact
Zoning	No Effect	The Build Alternative would be inconsistent with the arterial business, industrial, and rural residential zoning districts in the Town of Bulls Gap. Highway and road right-of-way are not amongst the permitted uses of the respective district. However, due to the Build Alternative being located predominantly along the existing SR-66 alignment, impacts to the affected zoning districts are anticipated to be minimal. Hawkins County does not have official zoning regulations; therefore, impacts to zoning in unincorporated Hawkins County, which comprises the northern portion of the Build Alternative, cannot be determined.	Continued coordination among TDOT, Hawkins County, and the Town of Bulls Gap is necessary to ensure that the Build Alternative is consistent with zoning to the extent possible.	No Significant Impact

*[33] Please note that of the approximately 129.70 acres within the limits of the Build Alternative, approximately 27.18 acres are already designated as transportation right-of-way. See **Section 4.1** of the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum, included in **Appendix D,** for acreage totals and acreage by existing land use type.*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Future Land Use	No Effect	The Town of Bulls Gap Land Use and Transportation Policy Plan[34] identifies an Urban Growth Area; however, the current limits of that area are unknown.[35] Therefore, it is unknown whether the proposed conversion of land to a transportation use would be consistent with the town's Urban Growth Area. Hawkins County does not have a future land use plan; therefore, impacts to future land use in unincorporated Hawkins County, which comprises the northern portion of the Build Alternative, cannot be determined. The Hawkins County Growth Plan[36] also does not contain information regarding the Town of Bulls Gap or areas within the vicinity of the Build Alternative.	Continued coordination among TDOT, Hawkins County, and the Town of Bulls Gap is necessary to ensure that the Build Alternative is consistent with future land use to the extent possible.	No Significant Impact
Planned Development	No Effect	Two planned developments were identified within the vicinity of the Build Alternative: an industrial facility for Southern Waste Services and a 4.8-megawatt Holston Electric power generation plant under development at the Natural Gas Liquids Supply Company fractionation facility. It is anticipated that right-of-way and/or easements may be acquired from the parcel on which the industrial facility for Southern Waste Services is planned. However, there are currently no structures on this parcel, and access to this parcel would be maintained during construction. It is anticipated that right-of-way and/or easements may be acquired from the parcels on which the Holston Electric power generation plant is under development. However, there are no anticipated impacts to any structures on these parcels, and access to these parcels would be maintained during construction.	Proposed right-of-way and easement amounts associated with the Build Alternative may be additionally minimized as the proposed project moves through the project development process. Therefore, impacts to planned development may be reduced.	No Significant Impact
Legislation, Plans, and Policies	No Effect	The Build Alternative would be consistent with stated infrastructure and economic development goals.	Not Applicable	No Significant Impact

*[34] Town of Bulls Gap Land Use and Transportation Policy Plan. See **Appendix B** of the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum, included in **Appendix D**. Adopted September 7, 2010. The Town of Bulls Gap Land Use and Transportation Policy Plan is not available online. A copy of the plan was provided by the First Tennessee Development District.*

[35] Please note that the copy of the 2010 Town of Bulls Gap Land Use and Transportation Policy Plan provided to TDOT by the Town of Bulls Gap did not include the figure depicting the location of the Urban Growth Area and at this time, the Town of Bulls Gap is unable to locate this figure. Therefore, the boundary of the Urban Growth Area is unknown at this time.

[36] https://attachment.tacir.tn.gov/Growth/GrowthPlans/Hawkins.pdf

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Farmland - See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum				
Farm Size and Agricultural Employment	No Effect	Over the 25-year review period (1997-2022), the number of farms and land in farms has decreased in Hawkins County; however, the average farm size in Hawkins County has increased. The agricultural industry has not served as the predominant source of employment for the labor force in Hawkins County over the 10-year review period (2012-2022) and consistently ranked in the bottom half of employment sectors for total numbers of persons employed. Additionally, the number of persons employed in the agricultural industry in Hawkins County has decreased over the 10-year review period. Converting a portion of the available farmland in Hawkins County to a transportation use reduces the overall amount of available farmland and, therefore, could reduce the need for agricultural industry employees. However, the agricultural industry is not a predominant source of employment in Hawkins County. Additionally, the amount of farmland to be converted to a transportation use may be minimized as the proposed project moves through the project development process. Therefore, impacts to farm size and agricultural employment as a result of the Build Alternative are anticipated to be minimal.	Proposed right-of-way and easement amounts associated with the Build Alternative may be additionally minimized as the proposed project moves through the project development process. Therefore, impacts to farm size and agricultural employment may be reduced.	No Significant Impact
Century Farms	No Effect	There is one recognized Century Farm within the limits of the Build Alternative that would be impacted by the Build Alternative.[37]	Proposed right-of-way and easement amounts associated with the Build Alternative may be additionally minimized as the proposed project moves through the project development process. Therefore, impacts to the Century Farm may be reduced.	No Significant Impact
Prime Farmland	No Effect	Approximately 27.1 acres of prime,[38] unique,[39] and/or statewide or locally important[40] farmland is found within the limits of the Build Alternative and would be converted to a transportation use. Overall, this is approximately 0.52 percent of the total amount of prime, unique, and/or statewide or locally important farmland acreage found within Hawkins County.	Proposed right-of-way and easement amounts associated with the Build Alternative may be additionally minimized as the proposed project moves through the project development process. Therefore, impacts to prime, unique, and/or statewide or locally important farmland may be reduced.	No Significant Impact

[37] Applications for recognition as a Tennessee Century Farm specify that contact information and the location of the farm will not be published. Information about the presence or absence of Century Farms within the limits of the Build Alternative was provided by the Middle Tennessee State University Center for Historic Preservation, which manages the Tennessee Century Farm program on behalf of the Tennessee Department of Agriculture.

[38] Prime Farmland – As defined by the NRCS – land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, or oil-seed and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Prime farmland includes land that possesses the above characteristics and may include land currently used as cropland, pastureland, rangeland, or forest land. Prime farmland does not include land already in or committed to urban development.

[39] Unique Farmland – As defined by the NRCS – land other than prime farmland that is used for production of specific high-value food and fiber crops. It has the special combination of soil quality, location, growing season, and moisture supply needed to economically produce high quality or high yields of specific crops when treated and managed according to acceptable farming methods.

[40] Statewide or Locally Important Farmland – As defined by the NRCS – land that has been designated of state or local importance to produce food, feed, fiber, forage, or oil-seed crops but is not of national significance.

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Impacts Under the Farmland Policy Protection Act	No Effect	The Natural Resources Conservation Service, in a letter dated November 8, 2024, stated that the Build Alternative contains prime, unique, and/or statewide or locally important farmland. The Build Alternative received a Farmland Conversion Impact Rating of 109.7 points. Sites receiving a rating of less than 160 points are not given further consideration for protection and no additional sites need to be evaluated. On December 11, 2024, TDOT provided the Natural Resources Conservation Service with the completed Farmland Conversion Impact Rating Form. Therefore, at this time, the requirements of the Farmland Policy Protection Act have been fulfilled for the Build Alternative.	At this time, the requirements of the Farmland Policy Protection Act have been fulfilled for the Build Alternative, and no further minimization or mitigation measures are needed.	No Significant Impact
Transportation - See **Appendix D** for the SR-66 Land Use, Farmland, and Transportation Infrastructure Technical Memorandum				
Road Network	No Effect	The Build Alternative would widen the existing two-lane roadway to an upgraded two-lane facility with four- to 10-feet paved shoulders, an intermittent 12-foot-wide two-way left-turn lane, five-foot sidewalks from SR-34 (US-11E, Andrew Johnson Highway) to north of Goan Drive, intermittent curb and gutter, and guardrail as required. The Build Alternative would also include minor horizontal and vertical alignment changes, primarily located in the Town of Bulls Gap, intended to meet current design standards.	Not Applicable	No Significant Impact
Bicycle and Pedestrian Facilities	The No-Build Alternative would be inconsistent with the State Transportation Improvement Program[41] and would not support the infrastructure goals of the legislation, plans, and policies.	The Build Alternative would include five-foot sidewalks in the Town of Bulls Gap where the existing land uses are commercial and residential, consistent with the First Tennessee Rural Planning Organization Rural Regional Transportation Plan.[42] The Build Alternative would also include paved shoulders four- to ten-feet in width, which would provide additional accommodations for bicyclists on SR-66.	Not Applicable	No Significant Impact
Freight Rail	No Effect	No Effect	Not Applicable	No Significant Impact
Planned Roadway Projects in the Vicinity of the Build Alternative	No Effect	No Effect	Not Applicable	No Significant Impact

[41] *Refer to **Appendix B** for a copy of the State Transportation Improvement Program page.*

[42] *https://www.tn.gov/content/dam/tn/tdot/long-range-planning/oct/1-First-TN-12-6-2023.pdf*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Community Impact, Relocations, and Economic Resources - See **Appendix E** for the SR-66 Community Impact Assessment, Relocations, and Economic Resource Technical Memorandum				
Relocation of Residents or Businesses	No Effect	There are 58 potential residential relocations: 51 single-family homes and seven mobile homes. There are also seven business relocations and zero non-profit relocations. In the event of relocations, there may be issues finding suitable replacement housing for any potential residential relocations. An examination of the Hawkins County residential real estate market near the SR-66 project area indicates an inadequate supply of available residential property to satisfy the relocation requirements of the 58 potential residential relocations. There is a larger inventory of homes in the Town of Rogersville (13 miles to the north), the City of Morristown (13 miles to the southwest), and the Town of Greeneville (17 miles to the southeast).	As the design of the Build Alternative is refined, impacts to residential and businesses properties within the SR-66 project area may be reduced. Should a property be acquired, compensation would be at fair market value. TDOT will make relocation assistance available to all eligible persons impacted by this project, including residences, businesses, farm operations, non-profit organizations, and those requiring special services or assistance. The TDOT Regional Relocation Staff will administer the relocation program under the rules, policies, and procedures set forth in the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,[43] as amended, the Uniform Relocation Assistance Act of 1972, implementing federal regulations, Tennessee Code Annotated 13-11-101 through 119,[44] The State of Tennessee Relocation Assistance Brochure,[45] and Chapter IX of the State of Tennessee Department of Transportation Right-of-Way Manual.[46] Additionally, in the event that suitable replacement housing is not available in the immediate SR-66 project area, TDOT will work with individuals to identify alternate options, potentially including the construction of a new home. Both renters and mobile home owners will also be compensated and will receive assistance from TDOT in the identification of, and relocation of their home to, a new location. Businesses subject to relocation under the Build Altenative will be compensated for their relocation to a new location including moving costs, incidentals, and the cost to reestablish the business in a new location. TDOT will provide advance notification of proposed right-of-way acquisition. The TDOT Right-of-Way Office has the responsibility, once a project is approved, of appraising, purchasing and, if required, assisting individuals, families or businesses in relocating. Before acquiring property, all properties are appraised based on comparable sales and land use values in the surrounding areas.	No Significant Impact

[43] https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter61&edition=prelim

[44] https://law.justia.com/codes/tennessee/title-13/chapter-11/

[45] https://www.tn.gov/content/dam/tn/tdot/right-of-way-division/brochures/New Residential_09-26-18.pdf

[46] https://www.tn.gov/content/dam/tn/tdot/right-of-way-division/ROW_Procedures_Manual.pdf

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Community Services and Facilities	No Effect	The Build Alternative is anticipated to impact five of the 20 community facilities or services identified within[47] or adjacent[48] to the limits of the Build Alternative. Partial acquisition of parcels associated with three churches (Trinity Pentecostal, Otes United Methodist Church, and Oak Grove Primitive Baptist Church), the East Tennessee Health Center, and Bulls Gap School is anticipated. None of the three impacted churches would be relocated. Access to these facilities would be maintained during construction, and the function of the properties would remain consistent post construction. Additionally, the anticipated impacts to the Bulls Gap School would not affect any of the functions of the school or the school building. The Build Alternative would warrant the relocation of the East Tennessee Health Center, and this property would not retain its current function post construction. Due to the proximity of other medical facilities in the area, it is not anticipated that this relocation would have an adverse impact on the community.[49]	Construction of the Build Alternative would be phased so that SR-66 would remain open throughout the duration of construction for the general public to access the identified community facilities. Refer to **Chapter 2** for more details regarding the proposed traffic control plans.	No Significant Impact
Community Stability and Cohesion	No Effect	Under the Build Alternative, impacts related to community cohesion have been determined to be moderate due to the following factors: • **Relocations**- The Build Alternative would result in relocations (51 single-family homes, seven mobile homes, and seven businesses) and potential impacts related to generational family farm ownership. The density and rural nature of the community following the relocation of residences and businesses as a result of the Build Alternative would be consistent with the current density and rural nature of the existing community. *(continued below)*	As the design of the Build Alternative is refined, impacts to residential and business properties within the SR-66 project area may be reduced. Should a property be acquired, compensation would be at fair market value. TDOT will make relocation assistance available to all eligible persons impacted by this project, including residences, businesses, farm operations, non-profit organizations, and those requiring special services or assistance. The TDOT Regional Relocation Staff will administer the relocation program under the rules, policies, and procedures set forth in the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,[50] as amended, the Uniform Relocation Assistance Act of 1972, implementing federal regulations, TCA 13-11-101 through 119,[51] The State of Tennessee Relocation Assistance Brochure,[52] and *(continued below)*	No Significant Impact

*[47] Community services and facilities were considered within the limits of the Build Alternative if they are located within the proposed right-of-way and easements as documented in the Right-of-Way Plans (dated August 9, 2024) (included in **Appendix C**).*

[48] Community services and facilities were considered adjacent to the limits of the Build Alternative if they are located within an approximately 0.5-mile radius of the centerline of the Build Alternative.

[49] The Bulls Gap Medical Center is located approximately 0.5 miles away from the East Tennessee Health Center and provides similar family practice medical services.

[50] https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter61&edition=prelim

[51] https://law.justia.com/codes/tennessee/title-13/chapter-11/

[52] https://www.tn.gov/content/dam/tn/tdot/right-of-way-division/brochures/New Residential_09-26-18.pdf

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
		(continued from above) • **Community Facilities**- Although five community facilities are anticipated to be impacted under the Build Alternative, only one community facility is anticipated to be relocated (the East Tennessee Health Center). Due to the proximity of other medical facilities in the area, it is not anticipated that the relocation of the East Tennessee Health Center would have an adverse impact on the community.[53] All other community facilities identified adjacent to or within the project area would not be relocated. Access to these community facilities would be maintained during construction, and the function of the properties would remain post construction. Access to community facilities and services following the relocation of residences and businesses as well as the East Tennessee Health Center would be consistent with the current dispersed and rural nature of the existing community. • **Creation of Barriers**- The Build Alternative has been designed to avoid creating a new physical barrier in the community by primarily consisting of widening the existing SR-66 roadway except in locations here minor alignment shifts are needed to correct roadway geometric deficiencies. Additionally, due to the development of houses, businesses, mobile homes, and non-profits in the area occurring predominantly after construction of existing SR-66, it is unlikely that the Build Alternative would introduce a perceived barrier that discourages interaction across the roadway.	*(continued from above)* Chapter IX of the State of Tennessee Department of Transportation Right-of-Way Manual.[54] Additionally, in the event that suitable replacement housing is not available in the immediate SR-66 project area, TDOT will work with individuals to identify alternate options, potentially including the construction of a new home. Both renters and mobile homeowners will also be compensated and will receive assistance from TDOT in the identification of, and relocation of their home to, a new location. Businesses subject to relocation under the Build Alternative will be compensated for their relocation to a new location including moving costs, incidentals, and the cost to reestablish the business in a new location. TDOT will provide advance notification of proposed right-of-way acquisition. The TDOT Right-of-Way Office has the responsibility, once a project is approved, of appraising, purchasing and, if required, assisting individuals, families or businesses in relocating. Before acquiring property, all properties are appraised based on comparable sales and land use values in the surrounding areas.	

[53] *The Bulls Gap Medical Center is located approximately 0.5 miles away from the East Tennessee Health Center and provides similar family practice medical services.*

[54] *https://www.tn.gov/content/dam/tn/tdot/right-of-way-division/ROW_Procedures_Manual.pdf*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Economic Conditions	No Effect	While Hawkins County is considered an at-risk county,[55] it is not anticipated that the Build Alternative would negatively affect employment in the current top three industries in Hawkins County, or impact unemployment rates in Hawkins County. Commuter data from the Tennessee Department of Labor and Workforce Development indicates that the majority of the labor force that lives in Hawkins County commutes to another county to work. The Build Alternative would improve system linkage by creating a consistent typical section along SR-66 from SR-34 (US-11E, Andrew Johnson Highway) to the county seat of Rogersville, to better accommodate traffic traveling from the Town of Bulls Gap to the Town of Rogersville, as well as travelers accessing SR-1 (US-11W, Lee Highway) and I-81. The Build Alternative would also support commuter and truck traffic traveling to and from the Barrette Outdoor Living facility. Conversations with local officials indicated that improved connectivity to the Town of Rogersville and SR-34 (US-11E, Andrew Johnson Highway) would encourage economic development in the area and benefit the Town of Bulls Gap, and there are numerous investments currently planned or under development in and around the SR-66 project area that have the potential to influence the labor force and the local economy. However, representatives from the Barrette Outdoor Living facility and Eco-Energy, LLC. indicated that any decisions to expand the existing facilities along SR-66 would not be influenced by the Build Alternative.	Not Applicable	No Significant Impact
Air Quality - See **Appendix F** for the SR-66 Air Quality and Noise Technical Memorandum				
Transportation Conformity	No Effect	The Build Alternative is located within Hawkins County, which is in attainment for all regulated criteria pollutants. Therefore, the Build Alternative is not subject to conformity.	Not Applicable	No Significant Impact
Mobile Source Air Toxics	No Effect	The Build Alternative qualifies as a "Project with Low Potential Mobile Source Air Toxic (MSAT) Effects" and is not predicted to create adverse Mobile Source Air Toxic effects.	Not Applicable	No Significant Impact
Construction Air Quality	No Effect	The Build Alternative may cause temporary generation of construction-related pollutant emissions.	To mitigate the temporary generation of construction-related pollutant emissions, standard best management practices would be implemented in accordance with the procedures in TDOT's Standard Specifications for Road and Bridge Construction.[56]	No Significant Impact

[55] *The Appalachian Regional Commission defines "at-risk" counties as those that "rank between the worst 10 percent and 25 percent of the nation's counties." Source: https://www.arc.gov/map/county-economic-status-in-appalachia-fy-2025/#:~:text=In%20fiscal%20year%202025%2C%2077,years%20of%20ARC's%20index%20system*

[56] *https://www.tn.gov/content/tn/tdot/tdot-construction-division/transportation-construction-division-resources/2021-standard-specifications.html/*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Noise - See **Appendix F** for the SR-66 Air Quality and Noise Technical Memorandum				
Noise	No Effect	Five noise analysis areas (NAA) were identified within the limits of the Build Alternative. The Build Alternative is predicted to impact the following residences by generating Design Year (2048) noise levels of 66 A-weighted sound level decibels (dBA) or higher: • One residence in NAA 2; and • Four residences in NAA 5. In total, the Build Alternative is anticipated to impact five Activity Category B (Residential) noise receivers in NAAs 2 and 5. However, the Build Alternative is not predicted to cause a substantial increase in existing noise levels or exceed the FHWA Noise Abatement Criteria.	No mitigation or minimization measures are currently proposed under the Build Alternative for noise related impacts. Noise barriers are not considered feasible for the five impacted residences because they would eliminate or restrict the ability to access SR-66.	No Significant Impact
Construction Noise	No Effect	Construction activities associated with the Build Alternative may generate intermittent and temporary noise above existing noise levels. The generated noise levels would depend on the types of equipment utilized, the duration of the activities, and the distances between construction activities and nearby land uses.	TDOT construction specifications will apply to this project. The contractor would follow the procedures in TDOT's Standard Specifications for Road and Bridge Construction[57] as amended by the most recent applicable supplements.	No Significant Impact

[57] *https://www.tn.gov/tdot/tdot-construction-division/transportation-construction-division-resources/2021-standard-specifications.html*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Historic Resources - See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum				
Historic Resources	No Effect	As part of the 2024 Updated Historic Architecture Assessment and Effects Assessment, 118 historic architectural resources were identified within the Area of Potential Effects[58] of the Build Alternative, 46 of which were previously identified in the 2013 Historic/Architectural Assessment and Documentation of Effect. Shadowland Farm and Berry Farm were determined to be eligible for listing on the National Register of Historic Places. However, it was determined that the Build Alternative would have no adverse effect to the National Register of Historic Places eligible Shadowland Farm and Berry Farm. Newton Farm, which was previously identified as eligible for listing on the National Register of Historic Places as part of the 2013 Historic/Architectural Assessment and Documentation of Effect, was determined to be no longer eligible for listing in the National Register of Historic Places. None of the additional historic architectural resources identified in the April 2024 Updated Historic Architecture Assessment and Effects Assessment were determined by TDOT to be eligible for listing on the National Register of Historic Places. The Tennessee State Historic Preservation Office, in letters dated January 22, 2013, December 30, 2015, December 5, 2019, and May 2, 2024, stated that the Build Alternative would not result in an adverse effect to any National Register of Historic Places listed or eligible historic architectural resources.	As part of TDOT standard practice, environmental commitments have been included on the green sheet of the EA to ensure that Shadowland Farm and Berry Farm are labeled in the design plans as historic and have their respective boundaries marked, will not be used as construction staging areas, and that any blasting that may occur within the vicinity of these resources should take into consideration the historic properties and take all possible measure to avoid impacts.[59]	No Significant Impact

[58] The historic architectural Area of Potential Effects for the proposed SR-66 project included the entirety of all parcels intersected by or immediately adjacent to the proposed project area, which, given the nature of the project, encompasses all properties that may be affected by the Build Alternative.

[59] Please note that these environmental commitments are based on TDOT standard practice for this type of project and are not tied to or required by the Section 106 or Section 4(f) processes.

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Archaeological Resources - See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum				
Archaeological Resources	No Effect	Four archaeological sites and three historic isolated finds[60,61] were identified within the Area of Potential Effects[62] of the Build Alternative. None of the aforementioned archaeological sites were found to be eligible for the National Register of Historic Places. Therefore, the Build Alternative would have no effect to National Register of Historic Places listed or eligible archaeological resources. The Tennessee State Historic Preservation Office, in letters dated May 29, 2012 and January 23, 2025, stated that the Build Alternative contains no archaeological resources eligible for listing in the National Register of Historic Places.	Not Applicable	No Significant Impact
Native American Consultation - See **Appendix G** for the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum				
Native American Consultation	No Effect	No effect. Section 106 (Native American Consultation) Coordination was sent to five Native American tribes on August 10, 2012 and eight Native American tribes on November 7, 2019, October 23, 2023, and September 18, 2024. Responses were received from the Cherokee Nation, the United Keetoowah Band of Cherokee Indians in Oklahoma, the Eastern Shawnee Tribe of Oklahoma, and the Shawnee Tribe. None of the tribes indicated that the Build Alternative would result in adverse impacts; however, they did request to be contacted in the event of an inadvertent archaeological finding. Additionally, the Cherokee Nation requested to be a consulting party. Cultural resources reports were sent to the Cherokee Nation on January 9, 2020, and again on January 27, 2025.	Not Applicable. Pursuant to Tennessee Code Annotated 11-6-107(d),[63] if human remains are identified, construction work must be halted, and the state archaeologist, the county coroner, and local law enforcement must be contacted immediately. In addition, each recognized Native American tribe will be contacted to afford a representative the opportunity to examine and evaluate the material found.	No Significant Impact

[60] A historic isolated find is defined by the presence of two or fewer artifacts within a 30-meter radius, recent twentieth-century artifacts, or those that appeared to be obviously redeposited or otherwise disturbed.

[61] One additional historic isolated find was identified as part of the May 2012 Phase I Archaeological Survey but was not identified as part of the January 2025 Addendum: Phase I Archaeological Survey.

[62] The archaeological Area of Potential Effects for the proposed SR-66 project included the limits of the existing and proposed right-of-way and easements associated with the Build Alternative.

[63] https://www.tn.gov/content/dam/tn/environment/archaeology/documents/TCA_Archaeology.pdf

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Section 4(f) Resources - See **Appendix G** for the SR-66 Cultural and Section 4(f)/ Section 6(f) Resources Technical Memorandum				
Section 4(f) Resources – Historic Architecture	No Effect	Two historic architecture sites within the Area of Potential Effects[64] of the Build Alternative were found eligible for the National Register of Historic Places, Shadowland Farm and Berry Farm.[65] The April 2024 Updated Historic Architecture Assessment and Effects Assessment noted that the Build Alternative would qualify as a Section 4(f) *De Minimis* Use of Shadowland Farm and Berry Farm, based on the Right-of-Way Plans (dated August 9, 2024) for the Build Alternative, which serve as the focus of the EA (included in **Appendix C**). Specifically, based on the Right-of-Way Plans (dated August 9, 2024), approximately 1.125 acres of right-of-way and permanent easements (slope and drainage) and approximately 1.15 acres of temporary construction easements would be acquired from Shadowland Farm. Additionally, approximately 3.88 acres of right-of-way and permanent easements (slope) and approximately 0.18 acres of temporary construction easements would be acquired from Berry Farm. In coordination dated April 18, 2024, FHWA stated that they agreed with TDOT's determinations that the Build Alternative would constitute a Section 4(f) *De Minimis* Use of Shadowland Farm and Berry Farm, as long as the Tennessee State Historic Preservation Office provides concurrence as well. The Tennessee State Historic Preservation Office concurred with this determination on May 2, 2024. Subsequently, FHWA signed the Final Section 4(f) *De Minimis* Evaluation on March 12, 2025.	The Build Alternative would not result in any impacts to Section 4(f) archaeological or recreational resources, or to wildlife and waterfowl refuges; therefore, no mitigation is proposed. In regards to historic Section 4(f) resources, as part of TDOT standard practice, environmental commitments have been included on the green sheet of the EA to ensure that Shadowland Farm and Berry Farm are labeled in the design plans as historic and have their respective boundaries marked, will not be used as construction staging areas, and that any blasting that may occur within the vicinity of these resources should take into consideration the historic properties and take all possible measure to avoid impacts.[66]	No Significant Impact
Section 4(f) Resources – Archaeological	No Effect	No Effect	Not Applicable	No Significant Impact
Section 4(f) Resources – Recreational	No Effect	No Effect	Not Applicable	No Significant Impact
Section 4(f) Resources – Wildlife and Waterfowl Refuges	No Effect	No Effect	Not Applicable	No Significant Impact

[64] The historic architectural Area of Potential Effects for the proposed SR-66 project included the entirety of all parcels intersected by or immediately adjacent to the proposed project area, which, given the nature of the project, encompasses all properties that may be affected by the Build Alternative.

[65] While the Newton Farm was originally determined to be eligible for the National Register of Historic Places as part of the 2013 Historic/Architectural Assessment and Documentation of Effect, it has since been was determined as part of the April 2024 Updated Historic Architecture Assessment and Effects Assessment to be no longer eligible for listing in the National Register of Historic Places due to demolitions and compromised integrity. Therefore, the Newton Farm is not discussed as part of the Effects Determination.

[66] Please note that these environmental commitments are based on TDOT standard practice for this type of project and are not tied to or required by the Section 106 or Section 4(f) processes.

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Natural Resources - See **Appendix H** for the SR-66 Natural Resources Technical Memorandum				
Perennial Streams[67,68]	No Effect	Twenty-two perennial streams (approximately 2,340 linear feet) are located within the limits of the Build Alternative.	Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent stream/wetland impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.	No Significant Impact
Intermittent Streams	No Effect	Six intermittent streams (approximately 1,235 linear feet) are located within the limits of the Build Alternative.	Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent stream/wetland impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.	No Significant Impact
Wet Weather Conveyances	No Effect	Four wet weather conveyances (approximately 185 linear feet) are located within the limits of the Build Alternative.	Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent stream/wetland impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.	No Significant Impact
Ponds	No Effect	Nine ponds (approximately 0.33 acres) are located within the limits of the Build Alternative.	Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent stream/wetland impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.	No Significant Impact
Wetlands	No Effect	Sixteen wetlands (approximately 0.539 acres) are located within the limits of the Build Alternative.	Throughout the design process, TDOT will endeavor to mitigate impacts to streams, wetlands, or any other jurisdictional water features through avoidance and minimization. Where impacts cannot be avoided or sufficiently minimized, compensatory mitigation for permanent stream/wetland impacts would be accomplished either through permittee-responsible mitigation, mitigation banking, or In-Lieu Fee mitigation to satisfy statutory requirements.	No Significant Impact

*[67] Aquatic resource impacts were identified based on the Aquatic Resource and Wetland Impact Table included within the December 2024 Environmental Boundaries Report, which is included in **Appendix A** of the SR-66 Natural Resources Technical Memorandum, included in **Appendix H**.*

[68] At this time, the determinations as to which are waters of the State and/or of the U.S. have not been confirmed by Tennessee Department of Environment and Conservation or the U.S. Army Corps of Engineers. The determination as to which features are waters of the State and/or U.S. will occur during later project development phases (permitting).

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Water Quality	No Effect	One 303(d)[69] listed stream, Whitehorn Creek, was found within the limits of the Build Alternative. The following existing impairments have been identified for Whitehorn Creek: • Alteration in stream-side or littoral vegetative covers, due to grazing in riparian or shoreline zones and crop production (non-irrigated); • Dissolved oxygen due to grazing in riparian or shoreline zones and crop production (non-irrigated); • *Escherichia coli (E. coli)* due to grazing in riparian or shoreline zones; and • Sedimentation/siltation due to grazing in riparian or shoreline zones and crop production (non-irrigated). Water quality may be impacted as a result of the Build Alternative.	Some of the projected impacts to water quality would be offset by the roadway design and by the federal, state, and local regulations that require erosion and sediment control plans, the implementation of best management practices, and various water quality permits that require water quality monitoring. Refer to **Section 3.1.2** for more details regarding construction-related water quality impacts.	No Significant Impact

[69] *The Environmental Protection Agency compiled a list in April 2024 of 303(d) impaired waters that do not meet water quality standards. Tennessee's 2024 303(d) List of Impaired and Threatened Waters can be accessed at: https://www.tn.gov/environment/program-areas/wr-water-resources/water-quality/water-quality-reports---publications.html*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Threatened and Endangered Species	No Effect	Per the U.S. Fish and Wildlife Service coordination letter, dated December 18, 2024, there are no federally listed or proposed species that would be impacted by the Build Alternative and Section 7 clearance of the Endangered Species Act of 1973[70] has been received. There will be "No Effect" to any federally listed species. The U.S. Fish and Wildlife Service also requested that standard construction best management practices be implemented to avoid and minimize impacts to the SR-66 project area streams and aquatic species. Per the Tennessee Wildlife Resources Agency coordination letter, dated December 13, 2019, implementation of standard best management practices would satisfy the needs of the Tennessee Wildlife Resources Agency. The Tennessee Wildlife Resources Agency also requested that a site visit should be conducted by qualified TDOT personnel to ensure erosion control measures are followed. Based on a review of the Tennessee Department of Environment and Conservation Rare Species Data Viewer, reviewed December 11, 2019, one state-listed species (Tennessee trillium (*Trillium tennesseense*)) was identified within a one-mile radius of the Build Alternative. In addition, two[71] state-listed rare species (Tennessee trillium (*Trillium tennesseense*) and American barberry (*Berberis canadensis*)) were identified within a one- to four-mile radius of the Build Alternative. One federally-listed rare species (Cumberland monkeyface (*Quadrula intermedia*)) was identified within a one- to four-mile radius of the Build Alternative. As indicated in the December 2024 Environmental Boundaries Report, the Build Alternative is covered under the 2023 Memorandum of Agreement between TDOT, FHWA, and Tennessee Department of Environment and Conservation Division of Natural Areas; therefore, coordination with the Tennessee Department of Environment and Conservation Division of Natural Areas was not completed.	To satisfy the requirements of the U.S Fish and Wildlife Service and the Tennessee Wildlife Resources Agency, standard best management practices would be implemented to avoid and minimize impacts to protected species.	No Significant Impact
Geology	No Effect	Construction of the Build Alternative may result in impacts to geology, such as impacts to drainage and ground and slope instability.	As per TDOT standard practice, TDOT would likely conduct a subsurface investigation during the design phase and develop a project-specific design to address any geotechnical or geological concerns that are identified at that time.	No Significant Impact

[70] https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter35&edition=prelim

[71] *Please note that the Tennessee trillium was identified within both a one-mile radius and a one- to four-mile radius of the Build Alternative.*

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Floodplains	No Effect	Portions of the Build Alternative are located in or near a Federal Emergency Management Agency defined floodplain; however, there is no detailed study. Specifically, approximately 2.36 acres of the 100-year floodplain associated with Whitehorn Creek, including McPhernon Branch and Moore Branch, are located within the limits of the Build Alternative. Whitehorn Creek is one of many tributary streams to the Nolichucky River, which is located south of the SR-66 project area.	The design of the Build Alternative would be consistent with the Memorandum of Understanding between the FHWA and the Federal Emergency Management Agency and with the floodplain management criteria set forth in the National Flood Insurance Regulations of Title 44 of the Code of Federal Regulations.[72] It would be consistent with the requirements of floodplain management guidelines for implementing Executive Order 11988[73] and FHWA guidelines 23 Code of Federal Regulations § 650A.[74]	No Significant Impact
Visual Impacts - See **Appendix I** for the SR-66 Visual Impact Assessment Technical Memorandum				
Visual Impacts	No Effect	The Build Alternative would not impact any scenic byways, national scenic areas, wild and scenic rivers, national scenic trails, national monuments, or Section 6(f) properties. There are two historic properties that are protected under Section 4(f) of the U.S. Department of Transportation Act of 1966[75] that would be impacted by the Build Alternative. Refer to the SR-66 Cultural and Section 4(f)/Section 6(f) Resources Technical Memorandum, included in **Appendix G**, for more details. The overall viewer sensitivity and project compatibility ratings within the visual environment were determined to be "low" to "moderate" and "compatible", respectively. Therefore, the Build Alternative is anticipated to have a neutral effect on the neighbors' and travelers' experience of overall visual quality within the Area of Visual Effect. Under the Build Alternative, there would be some areas throughout the Area of Visual Effect where roadways were previously not visible but would be visible in at least one direction under the Build Alternative; however, these areas are minimal, as most individuals within the Area of Visual Effect already see existing roadway infrastructure under the existing condition.	Not Applicable	No Significant Impact

[72] https://www.ecfr.gov/current/title-44

[73] https://www.archives.gov/federal-register/codification/executive-order/11988.html

[74] https://www.ecfr.gov/current/title-23/chapter-I/subchapter-G/part-650/subpart-A

[75] https://www.govinfo.gov/content/pkg/STATUTE-80/pdf/STATUTE-80-Pg931.pdf

Impact Category	No-Build Alternative Effects Determination	Build Alternative Effects Determination	Minimization/Mitigation Measures to Address Impacts	Analysis Result
Hazardous Materials - See **Appendix J** for the SR-66 Hazardous Materials Technical Memorandum				
Hazardous Materials	No Effect	The May 2012 Phase I Preliminary Assessment Study identified four hazardous material sites within the limits of the Build Alternative. All four sites were noted as having a "low" potential for encountering hazardous materials. The October 2024 Hazardous Materials Database Review was completed to document an updated federal and state database search of potential hazardous material sites. Based on the October 2024 Hazardous Materials Database Review, ten potential hazardous material sites were found within the limits of the Build Alternative.[76] Two of the ten potential hazardous materials sites identified in the October 2024 Hazardous Materials Database Review were previously identified in the May 2012 Preliminary Assessment Study. Additionally, the remaining two potential hazardous materials sites identified in the May 2012 Preliminary Assessment Study are above ground storage tanks and as such are not included with the results of the October 2024 Hazardous Materials Database Review since their location is not included in publicly accessible databases; however, for the purposes of this EA, the aboveground storage tanks are still assumed to be in the SR-66 project area.	Avoidance or minimization, and no additional studies are recommended at this time. However, in the event hazardous substances/wastes are encountered within the right-of-way, their disposition shall be subject to all applicable regulations, including the applicable sections of the Federal Resource Conservation and Recovery Act of 1976,[77] as amended; the Comprehensive Environmental Response, Compensation, and Liability Act of 1980,[78] as amended; the Superfund Amendments and Reauthorization Act of 1986;[79] and the Tennessee Hazardous Waste Management Act of 1983,[80] as amended.	No Significant Impact

[76] *Please note the October 2024 Hazardous Materials Database Review was limited to desktop research only. No field work efforts occurred, and no formal update to the May 2012 Phase I Preliminary Assessment Study was prepared.*

[77] *https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act*

[78] *https://www.epa.gov/superfund/superfund-cercla-overview#:~:text=The%20Comprehensive%20Environmental%20Response%2C%20Compensation%2C%20and%20Liability%20Act%20of%201980,waste%20at%20these%20sites%3B%20and*

[79] *https://www.epa.gov/superfund/superfund-amendments-and-reauthorization-act-sara*

[80] *https://law.justia.com/codes/tennessee/2016/title-68/environmental-protection/chapter-212/part-2*

3.1.2. Construction and Operations Impacts

A roadway construction project is likely to cause some level of inconvenience through disruption to residents, businesses, and travelers. Maintenance of traffic, access to properties adjoining the road, and utility relocations are construction-related issues and would be addressed throughout the project development process.

Operations refers to the fuel use associated with construction related activities, routine maintenance, and motor vehicle use.

The No-Build Alternative would not have any construction or operations related impacts. However, future impacts may occur from maintenance work on the existing roadway.

The Build Alternative would have the following construction and operations related impacts:

- **Traffic and Access** - Construction of the Build Alternative may create a temporary inconvenience for local residents and businesses attempting to reach destinations within the SR-66 project area. Additionally, construction of the Build Alternative may cause temporary traffic impacts. Access to properties would be maintained during construction; however, access may become more challenging during construction. The design plans for the Build Alternative would include a general note to the contractor that no less than seven days prior to the closure of a road during construction, the contractor shall provide a notice describing the affected roads and the approximate duration of the construction to relevant individuals or agencies that include, but are not limited to: the local law enforcement office(s), the local fire department(s), ambulance services, local school superintendent(s), United States Postal Service, and the local road superintendent. Traffic control measures and access are covered in more detail in **Section 2.5** and **Section 2.6** of this EA.
- **Fuel Consumption** - The Build Alternative would have the following impacts related to fuel consumption:
    - **Construction** – Fuel would be used for the manufacturing and transport of the construction components and by the heavy equipment used for roadway construction. Traffic delays could accompany the construction activities and could result in temporary increases in fuel use.
    - **Maintenance** - The Build Alternative would require routine maintenance that would result in fuel use. Traffic delays could result from maintenance activities and cause temporary increases in fuel use.
    - **Motor Vehicle Use** - The Build Alternative is anticipated to improve system linkage on the overall roadway network, thereby decreasing fuel use.
- **Air Quality** - Construction of the Build Alternative may cause temporary generation of construction-related pollutant emissions. Refer to **Table 4** for more details regarding air quality impacts and minimization/mitigation measures.
- **Noise** - The Build Alternative may cause intermittent and temporary noise above existing noise levels. Refer to **Table 4** for more details regarding noise impacts and minimization/mitigation measures.

- **Geology** - Construction of the Build Alternative may result in impacts to geology. Refer to **Table 4** for more details regarding impacts to geology and minimization/mitigation measures.
- **Water Quality and Erosion** - Construction of the Build Alternative has the potential to result in temporary impacts to water quality. The project would be subject to conditions of the National Pollutant Discharge Elimination System (NPDES) and permit conditions would require the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) to help control erosion, sedimentation, and other project-generated waste. Refer to **Table 4** for more details regarding water quality impacts and minimization/mitigation measures.
- **Utilities** - Underground and above-ground utilities are currently located within the existing right-of-way or immediately adjacent to it. Utilities located within the proposed right-of-way for the Build Alternative that are in conflict with the design of the Build Alternative would be relocated. Relocation of utilities could result in temporary pauses in service; however, construction of the Build Alternative would not result in the permanent elimination of any current services. As the design process progresses, TDOT would confirm which utilities warrant relocation. Relocation of utilities would be coordinated with the appropriate service providers to avoid or minimize disruption of service.
- **Vibration** - Trucks and machinery used for construction produce noise and vibration, which may affect some land uses and activities during the construction period. Individuals inhabiting homes along the Build Alternative would, at some time, experience perceptible construction noise and vibration from the construction of this project. Occupants of buildings near some construction equipment may perceive ground vibration effects during the operation of that equipment. Although these effects are temporary and would vary from day to day based on specific construction operations, damage to buildings is not anticipated. The contractor would follow the procedures in TDOT's Standard Specifications for Road and Bridge Construction[81] as amended by the most recent applicable supplements. Mitigation measures incorporated into TDOT's Standard Specifications for Road and Bridge Construction[82] to minimize or eliminate the effects of construction noise on adjacent noise receptors are expected to also mitigate the effects of vibration.
- **Solid Waste and Hazardous Waste** - Potential hazardous material sites were identified within the limits of the Build Alternative. Solid waste could be generated by project construction (e.g., through demolition and removal of structures).

[81] *https://www.tn.gov/tdot/tdot-construction-division/transportation-construction-division-resources/2021-standard-specifications.html*

[82] *https://www.tn.gov/tdot/tdot-construction-division/transportation-construction-division-resources/2021-standard-specifications.html*

The quantity of disposed waste and construction debris would represent a negligible proportion of the total waste directed toward local landfills. Refer to **Table 4** for more details regarding hazardous materials impacts and minimization/mitigation measures.

- **Archaeology and Native American Consultation** - Construction of the Build Alternative could result in the identification of unknown archaeological sites. If archaeological materials are uncovered during construction, all construction work in the area of the find will cease. The Tennessee Division of Archaeology and recognized Native American tribes will be immediately contacted so that their representative may have the opportunity to examine and evaluate the materials. Refer to **Table 4** for more details regarding archaeological impacts, Native American Consultation, and minimization/mitigation measures.
- **Terrestrial and Aquatic Species** - The contractor would be required to prepare and implement a revegetation plan that has been approved by TDOT. If the contractor must permanently remove an area of mixed forest for temporary use (i.e., construction staging), it would be replaced with plantings of native tree species within the affected area.
- **Wetlands** - Construction activities would be confined within the permitted limits to prevent unnecessary disturbance of adjacent wetland areas. Potential temporary impacts to wetlands would be minimized by implementing sediment and erosion control measures, including seeding of side slopes, silt fences, and sediment basins, as appropriate. Refer to **Table 4** for more details regarding wetland impacts and minimization/mitigation measures.

Without proper planning and implementation of controls, traffic disruption, loss of access, and utility relocation could adversely affect the daily life of residents and inconvenience or disrupt the flow of customers, employees, and material or supplies to and from businesses. Construction impact controls would be integrated into the project's contract specifications and traffic control plans.

Potential construction-related impacts are anticipated to be temporary and would not exceed the timeframe during which active construction of the Build Alternative would take place.

As it relates to operations, the amount of fuel required to construct a highway project of this type is substantial, but temporary in nature, and generally leads to reduced operating costs once the proposed project is completed. Given that the Build Alternative is predominantly widening existing SR-66, it is not anticipated that fuel impacts related to Build Alternative would be more than the No-Build Alternative post construction.

3.1.3. Identification of Significant Impacts for Direct Effects

Following the analysis of impacts, as described in **Table 4** and **Section 3.1.2**, the following impact determinations have been made for both the No-Build and Build Alternatives:

- **No-Build Alternative** - The No-Build Alternative would have no significant direct effects on the social, economic, physical, and natural resources identified within the SR-66 project area.
- **Build Alternative** - The Build Alternative would have no significant direct effects on the social, economic, physical, and natural resources identified within the SR-66 project area.

3.1.4. Measures to Minimize or Mitigate Any Direct Effects

Measures to minimize or mitigate any direct effects are presented in **Table 4** and **Section 3.1.2**.

3.2. Environmental Permits

The following permits would be required from the USACE and the Tennessee Department of Environment and Conservation (TDEC) for implementation of the Build Alternative:

- Clean Water Act Section 404 Permit[83]- Required for construction that involves placement of dredge and fill material in Waters of the U.S. Typical Waters of the U.S. include rivers, blueline streams,[84] headwaters streams, and special aquatic sites, such as wetlands. Section 404 Permits are issued by the USACE and may include individual or nationwide permits depending on the activity and resource (USACE issues Clean Water Act Section 404 Permits);
- Section 401 Water Quality Certification[85]- Required to ensure that activities requiring Federal permits or licenses would not cause pollution in violation of State water quality standards (TDEC's Division of Water Resources issues 401 Water Quality Certifications[86]);
- Aquatic Resource Alteration Permit (ARAP)[87]- Required for any alterations of State waters, including wetlands that do not require a Federal (Section 404) permit. The ARAP permits are required for construction at locations where the proposed project involves placement of fill in the following: a pond that is spring fed or impacts springs; reservoirs; wetlands; blue line streams; intermittent blueline streams on the U.S. Geological Survey (USGS) 7.5 quadrangle map; any stream that supports any form of aquatic life; or is in the vicinity of a State-listed endangered species (TDEC's Division of Water Resources issues ARAP permits[88]);

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[83] *https://www.lrn.usace.army.mil/Missions/Regulatory/Final-Jurisdictionals/*

[84] *"Blue-line stream" means that a stream appears as a broken or solid blue line (or a purple line) on a U.S. Geological Survey topographic map and may refer to creeks, streams, or other flowing water features (perennial or ephemeral).*

[85] *https://www.tn.gov/environment/permit-permits/water-permits1/aquatic-resource-alteration-permit--arap-.html*

[86] *https://www.tn.gov/environment/permit-permits/water-permits.html*

[87] *https://www.tn.gov/environment/permit-permits/water-permits1/aquatic-resource-alteration-permit--arap-.html*

[88] *https://www.tn.gov/environment/permit-permits/water-permits.html*

- National Pollutant Discharge Elimination System (NPDES)[89] - Required for grubbing, clearing, grading, or excavation that result in an area of disturbance of one or more acres of land and for stormwater discharges (TDEC's Division of Water Resources issues NPDES permits[90]); and
- Storm Water Pollution Prevention Plan (SWPPP)[91] - Developed for the project in accordance with the conditions of the Construction General Permit (CGP) (TDEC's Division of Water Resources issues NPDES permits[92]).

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[89] https://www.tn.gov/environment/permit-permits/water-permits1/npdes-permits1/npdes-stormwater-permitting-program/npdes-stormwater-construction-permit.html

[90] https://www.tn.gov/environment/permit-permits/water-permits.html

[91] https://www.tn.gov/environment/permit-permits/water-permits1/npdes-permits1/npdes-stormwater-permitting-program/npdes-stormwater-construction-permit.html

[92] https://www.tn.gov/environment/permit-permits/water-permits.html

4. Chapter 4 –Agency Coordination and Public Involvement

Throughout the development of this project, the public, agencies, and other stakeholders have been given opportunities to provide input. This chapter summarizes the agency coordination and public involvement activities conducted, and describes the key issues identified through those coordination activities.

4.1. Project Initiation

On September 13, 2024, TDOT provided written notification to FHWA of its intent to initiate the NEPA process for SR-66 and develop an EA to comply with NEPA. FHWA provided written concurrence with this approach via letter dated September 17, 2024. This written concurrence serves as the official start to the NEPA process for SR-66.

Refer to the SR-66 Agency Coordination Technical Memorandum in **Appendix K** for a copy of TDOT's September 13, 2024, Letter of Intent to FHWA and for a copy of FHWA's September 17, 2024, Concurrence Letter.

4.2. Agency Coordination

4.2.1. Early Coordination

On October 11, 2024, TDOT distributed an early coordination package to agencies, organizations, and government officials asking for input and comments regarding the proposed project. The early coordination package consisted of a transmittal letter, a project location map, and a copy of the Coordination and Public Involvement Plan (see **Section 4.2.2** for additional details). The transmittal letter requested that recipients review the enclosed materials and provide input/comments on the proposed project.

Additionally, in accordance with 23 USC § 139,[93] the transmittal letter invited Federal, State, and Local agencies with an interest in the project to serve as Participating Agencies[94] for the project. The USACE was invited to become a Cooperating Agency, and they accepted this invitation on November 7, 2024.[95]

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[93] *https://www.law.cornell.edu/uscode/text/23/139*

[94] *As also defined in 23 CFR § 771.107, participating agencies are Federal, State, local, or federally recognized Indian Tribal governmental unit that may have an interest in the proposed project and has accepted an invitation to be a participating agency or, in the case of a Federal agency, has not declined the invitation in accordance with 23 USC § 139 (d)(3).*

[95] *See **Appendix A** of the SR-66 Agency Coordination Technical Memorandum, included in **Appendix K** for a copy of the USACE (Nashville District) acceptance letter*

4.2.2. Coordination and Public Involvement Plan

A project-specific Coordination and Public Involvement Plan (CPIP) was developed by TDOT in October 2024 to define the process by which information about the proposed SR-66 project would be communicated to the agencies, as well as the public, and how input from agencies and the public would be solicited and considered. As discussed in **Section 4.2.1**, a copy of the 2024 October CPIP was distributed as part of the early coordination package sent to agencies, organizations, and government officials for their review and comment.

The October 2024 CPIP was updated in March 2025 to reflect an error in the number of agencies that were coordinated with during the October 2024 early coordination efforts.

Refer to the SR-66 Agency Coordination Technical Memorandum, located in **Appendix K**, for copies of both the October 2024 and March 2025 CPIP.

4.2.3. Distribution to and Input Received from Interested Agencies, Organizations, Entities, and Government Officials

Approximately 96[96] agencies, organizations, and government officials received the October 11, 2024, early coordination package.[97] TDOT requested that recipients of the early coordination package provide responses and input regarding the proposed project on or by November 11, 2024. Copies of the early coordination transmittal letter, project location map, and the 2024 CPIP are included in **Appendix K.**

Refer to the SR-66 Agency Coordination Technical Memorandum, located in **Appendix K**, for information regarding the agencies, individuals, or organizations receiving the October 11, 2024, early coordination packages, as well any responses or comments received.

4.3. Tennessee Environmental Streamlining Agreement

During preparation of the early coordination packages in October 2024, TDOT and the FHWA determined that the proposed SR-66 project did not warrant involvement in the Tennessee Environmental Streamlining Agreement (TESA) process due to anticipated minimal adverse impacts to the resources that are protected under the jurisdiction of the agencies that are parties to TESA. For additional information on the TESA process and on the determination that the proposed SR-66 project did not warrant involvement in the TESA process, see the SR-66 Agency Coordination Technical Memorandum, located in **Appendix K.**

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[96] The October 2024 CPIP incorrectly stated that 102 agencies, officials, and organizations received the October 2024 Early Coordination Package. Additionally, the October 2024 CPIP noted that in some instances, the October 2024 Early Coordination Package was distributed to multiple individuals at a single agency. In total, the October 2024 CPIP noted 49 agencies received the October 2024 Early Coordination Package. However, after further review, only 41 agencies (96 individuals total) received the October 2024 Early Coordination Package. Please note that consultation as participating agencies with the eight Native American Tribes was not undertaken as part of the October 2024 early coordination process. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) (https://www.achp.gov/protecting-historic-properties), Native American Tribes are considered Section 106 Consulting Parties and will be contacted accordingly.

[97] In response to the October 11, 2024, early coordination package distribution, one individual responded indicating that they no longer work for the respective office and provided contact information for two other individuals in that office. Therefore, an early coordination package was distributed to these two additional individuals on October 23, 2024.

4.4. Public Involvement

4.4.1. Design Public Meetings Held Prior to the Initiation of the Environmental Assessment

TDOT hosted two design public meetings for the proposed SR-66 project during the initial public engagement efforts prior to the initiation of the EA:

- November 17, 2016 - Design Meeting
- November 13, 2018 - Public Meeting

Additional details about these meetings, including attendance, copies of the materials provided by TDOT to participants, and any comments received are available in the SR-66 Public Engagement Summary included in **Appendix L**.

4.4.2. Public Meeting Held After Initiation of the EA - November 12, 2024

On November 12, 2024, TDOT hosted a public meeting at Bulls Gap School located at 315 Allen Drive, Bulls Gap, Tennessee. The purpose of the November 12, 2024, Public Meeting was to provide a project status update, introduce the project's preliminary purpose and need statement as well as the range of alternatives under consideration in the EA, provide a project history (including the determination by FHWA and TDOT to move forward with the project as an EA based on the anticipated number of relocations) and provide an update on the project schedule. Notification of the November 12, 2024, Public Meeting was provided through the following means:

- Project website – The public meeting was advertised on the TDOT project website beginning in October 2024.
  - URL: https://www.tn.gov/tdot/projects/projects-region-1/state-route-66.html or
  - Tiny URL: https://tinyurl.com/SR-66Hawkins
- Newspaper - A public notice was published in *The Rogersville Review*[98] on October 30, 2024, and November 6, 2024.
- Postcard - A postcard public meeting invite was mailed to all property owners of record for all parcels adjacent to the Build Alternative as well as parcels within a 250-feet of the centerline of the Build Alternative.

During the November 12, 2024, Public Meeting, project information was delivered through a PowerPoint presentation followed by a formal question-and-answer session where members of the public in a group session could ask questions of the TDOT project team, and an open house where members of the TDOT project team were available to discuss the project and review displays with members of the public individually.

[98] *https://www.therogersvillereview.com/*

A total of 97 members of the public and 18 TDOT representatives/consultants attended the public meeting. A videographer was also present to record the PowerPoint presentation as well as to record comments from the public either in the question-and-answer session or independently during the open house portion of the meeting. Following the public meeting, the video recording of the meeting was transcribed by a court reporter into a formal transcript of the meeting.

As each member of the public arrived, they were asked to sign in and were provided a project informational handout and a pre-addressed postage paid comment card. Following the public meeting on November 12, 2024, the public could provide comments or questions to TDOT in the following formats:

- Project specific toll-free number (1-800-546-0949)
- Project email address (TDOT.comments@tn.gov)
- Comment forms – Members of the public were encouraged to submit responses to the comment form via the following means:
  - Pre-addressed postage paid comment cards distributed at the public meeting.
  - Comment cards available for download via the project website for individuals to print and mail at a later time.
  - Electronically via: https://www.surveymonkey.com/r/D2YCMGT which was advertised on the TDOT project website as well as via the QR code which was printed on public meeting notification postcard, PowerPoint Presentation, and in the project informational handout.
- Letters - Members of the public were advised of the option to submit a letter with either their comment or question to the following address:
  - State Route 66
    C/O Kimley-Horn and Associates
    10 Lea Avenue, Ste 400
    Nashville, TN 37210

All public meeting materials were also posted to the TDOT website following the November 12, 2024, Public Meeting. See **Appendix L** for a copy of the SR-66 Public Engagement Summary that includes additional information on the November 12, 2024, Public Meeting.

4.4.3. Other Outreach

PROJECT WEBSITE

The dates, time, and location for the November 12, 2024, Public Meeting were posted on the project's website at:

- URL: https://www.tn.gov/tdot/projects/projects-region-1/state-route-66.html or
- Tiny URL: https://tinyurl.com/SR-66Hawkins

The project website includes an overview of the project, project history and background, preliminary purpose and need, alternatives under study, preliminary environmental impacts, materials from previous public involvement events, information about the right-of-way acquisition and relocation process, timeline, and TDOT contacts. The project website also serves as one of the means of public involvement and feedback for the project.

NEWSPAPER

TDOT identified the following newspaper for use in publishing notices and reminders of project meetings and, as appropriate, other outreach efforts: *The Rogersville Review*.

PROJECT SPECIFIC TOLL-FREE NUMBER

TDOT provided a toll-free phone number (1-800-546-0949) for the public to ask questions and make comments about the proposed project during the official comment period, from November 12, 2024, to December 9, 2024. Official responses by an appropriate TDOT representative were provided within seven business days.

PROJECT EMAIL ADDRESS

To provide the public with a convenient single point of contact, TDOT prompted members of the public to send an email to TDOT.comments@tn.gov, using the subject line "State Route 66 Project". This email address was made available for general inquiries and was also an option for submittal of official comments during the comment period. During the comment period, from November 12, 2024, to December 9, 2024, official responses to emails were provided by an appropriate TDOT representative within seven business days.

4.4.4. Summary of Public Input Received

During the official comment period associated with the development of the EA for the proposed project, from November 12, 2024, to December 9, 2024, the public provided input through the following means:

- Written comments – Comment cards, online comment card, letters, and emails.
- Verbal comments – Comments provided to videographer for transcription following the public meeting by a court reporter or calls to the project specific 1-800 phone line.

TDOT asked that all voicemail messages, completed comment cards, emails, and letters be submitted to TDOT by December 9, 2024. All comment cards or letters postmarked by December 9, 2024, are considered part of the official transcript of the November 12, 2024 Public Meeting.

Table 5 summarizes the formal comments received via voicemail, comment card, email, or letter during the official comment period ending December 9, 2024. In total, TDOT received 40 comments through a variety of formats. Some commenters provided more than one comment; therefore, the 40 comments represent comments from 36 people.

Table 5: Total Comments Received by Comment Method[99]

Comment Method	Comment Cards	Email Comments	Online Forms	Telephone Comments	Letters
Comments Received	35	2	3	0	0
Total	**40**				

4.5. Distribution of the EA and Notice of Availability

Following FHWA approval of the EA document, a Notice of Availability (NOA) of the EA document will be posted to the project website and published in the local newspaper, *The Rogersville Review*. The notice will identify where the EA will be available for public review, how the public can provide input, and who to contact with comments or for additional information. Additionally, the EA will be distributed to federal, state, and local agencies and elected officials who were identified as part of the early coordination process (refer to **Section 4.2** and the SR-66 Agency Coordination Technical Memorandum in **Appendix K** for additional details).

Copies of the EA will be made available for public inspection at the following locations:

Hawkins County Courthouse
150 East Washington Street
Rogersville, TN 37857

- H.B. Stamps Memorial Library
  407 East Main Street, Suite 1
  Rogersville, TN 37857
- Bulls Gap Town Hall
  139 South Main Street
  Bulls Gap, TN 37711
- TDOT District 17 Morristown Office
  1825 State Street
  Morristown, TN 37814

The EA and associated technical appendices will also be made available electronically via the SR-66 project website:

- URL: https://www.tn.gov/tdot/projects/projects-region-1/state-route-66.html or
- Tiny URL: https://tinyurl.com/SR-66Hawkins

[99] *TDOT, SR-66 Public Engagement Summary, December 2024, included in* ***Appendix L****.*

4.6. Public Hearing

Once FHWA approves the EA document and the EA is made available for public and agency review, TDOT will hold a public hearing to receive comments on the findings presented in the EA and on the proposed project. Input from the public hearing and comment period will be considered by TDOT in the decision-making process for selection of the preferred alternative and potential mitigation measures. This information will be documented in the final environmental document.

The public hearing will be held in the SR-66 project area and will be advertised in the local newspaper, *The Rogersville Review*.

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5. Chapter 5 – Statute of Limitations

The FHWA may publish a notice in the Federal Register,[100] pursuant to 23 U.S. Code 139(l),[101] indicating that one or more Federal agencies have taken final action on permits, licenses, or approvals for the subject transportation project. If such notice is published, claims seeking judicial review of those Federal agency actions will be barred unless such claims are filed within 150 days after the date of publication of the notice or within such shorter time period as is specified in the Federal laws pursuant to which judicial review of the Federal agency action is allowed. If no notice is published, then the periods of time that otherwise are provided by Federal laws governing such claims will apply.

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[100] *https://www.federalregister.gov/*

[101] *https://www.govinfo.gov/content/pkg/USCODE-2011-title23/html/USCODE-2011-title23-chap1-sec139.htm*

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