INTERSTATE 69,
SECTION OF INDEPENDENT UTILITY #9

From the Interstate 55/MS State Route 304 Interchange in Hernando, Mississippi to the Intersection of U.S. 51 and State Route 385 in Millington, Tennessee DeSoto and Marshall Counties, Mississippi Shelby and Fayette Counties, Tennessee

Final Environmental Impact Statement
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U.S. Department of Transportation
Federal Highway Administration,
Tennessee Department of Transportation and
Mississippi Department of Transportation

Cooperating Agency
Tennessee Valley Authority
U.S. Army Corps of Engineers, Memphis District
U.S. Army Corps of Engineers, Vicksburg District
U.S. Department of Interior, Fish and Wildlife Service

This document identifies and assesses the environmental impacts associated with the construction of an interstate facility from Hernando, Mississippi to Millington, Tennessee. The project is a segment of Corridor 18, a Congressionally-designated High Priority transportation Corridor that will be designated as Interstate 69. Segments of the roadway are proposed for new locations, while other segments will follow existing interstates and state highways built to interstate standards. The length of the proposed improvement is approximately 44 miles.

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SUMMARY

Proposed Action
This Final Environmental Impact Statement (FEIS) identifies and assesses the environmental impacts associated with the construction of a segment of proposed Interstate 69 (I-69) that extends from Canada to Mexico across the United States. The segment of interstate highway discussed in this document is Segment of Independent Utility 9 (SIU 9) as identified in the I-69 Corridor 18, Special Environmental Study dated February 7, 2000. The study corridor begins at the Interstate 55 (I-55) and Mississippi 304 (MS 304) Interchange in Hernando, Mississippi and extends north through Memphis, Tennessee to the intersection of US Highway 51 (US 51) and State Route 385 (SR 385) in Millington, Tennessee. The project is located in DeSoto and Marshall Counties in northwest Mississippi and Shelby and Fayette Counties in southwest Tennessee (Reference the Project Location map, Figure 1).

The Tennessee Department of Transportation (TDOT), the Mississippi Department of Transportation (MDOT), and the Memphis Metropolitan Planning Organization (MPO), in cooperation with the Federal Highway Administration (FHWA) is proposing a Systems Approach Alternative for this segment (SIU 9) of proposed I-69. It involves constructing two routes, an I-69 route through Memphis and a proposed I-269 route which by-passes Memphis to the east. The proposed project is consistent with the Memphis Long Range Transportation Plan and Mississippi’s Vision 21 Plan.

Background
This proposed project is part of the overall 1,600 mile long I-69 corridor that is proposed to connect Canada to Mexico across the United States. The I-69 corridor has been supported by Congressional mandates since 1991. It was first approved as a high priority corridor from Indianapolis, Indiana to Memphis, Tennessee in the 1991 Intermodal Surface Transportation Efficiency Act (ISTEA) legislation. In 1993 it was further amended by Congress to extend from Memphis to Houston, Texas. The National Highway System Designation Act of 1995 further extended the corridor from Houston to include the Lower Rio Grande Valley of Texas. The
Transportation Equity Act for the 21st Century (TEA 21), signed into law June 9, 1998 redefined the corridor and officially designated it as Interstate 69.

A Steering Committee was formed after the passage of the ISTEA legislation with members representing the eight states along the corridor to guide the development of the 1,600 mile long I-69 corridor study. The member states are Texas, Louisiana, Arkansas, Mississippi, Tennessee, Kentucky, Indiana, and Michigan. Each state department of transportation and the FHWA are represented on the Steering Committee. The Arkansas State Highway and Transportation Department was designated as the administrative agency for the Steering Committee.

Several studies of the overall corridor have been conducted under the guidance of the Steering Committee:

1. Corridor 18 Feasibility Study (1995)
2. Corridor 20 Feasibility Study (1996)
3. Corridor 18 Special Issues Study (1997)
4. I-69 (Corridor 18) Special Environmental Study (2000)

These studies involved developing the purpose and need for I-69, setting goals, and evaluating the feasibility of multimodal alternatives such as rail, mass transit, and river barges. Based on the results of these studies it was determined that an interstate highway was the most feasible and most cost effective alternative to meeting the purpose and need of I-69. The overall 1,600 mile corridor was divided into 32 Segments of Independent Utility (SIU’s) for study purposes. Each state is responsible for the segments within their state boundaries. Segments of Independent Utility are defined as independent highway sections that have logical beginning and ending points and are stand-alone projects that are considered to be a reasonable expenditure of public funds even if no other sections of I-69 were built. The proposed segment discussed in this document is Segment of Independent Utility 9 (SIU 9). (Copies of the above listed reports are available at TDOT and MDOT offices.)
**Purpose and Need**

The purpose of I-69 is to provide an adequate transportation corridor for the movement of freight between Canada and Mexico. Studies of the movement of commodities, both finished goods and raw materials, show there is a significant demand for this movement of freight to occur along a route within the designated I-69 Corridor (See Corridor Map Figure 1.1). With the increasingly global economy and evolving international trade opportunities, making a connection from Canada to Mexico across the United States is vital to the health of the United States economy. The I-69 corridor will improve international and interstate trade, increase accessibility to the region, improve transportation system linkages, and stimulate economic development. I-69 will give the nation new capacity to efficiently move commodities from border to border significantly reducing travel times and cost.

The purpose of SIU 9 is also to respond to local traffic growth and travel demands of the region by providing a high speed access controlled facility that is responsive to traffic usage and enhances access between communities and routes within the I-69 Corridor.

Memphis is the center of a 21 county growth area that includes eastern Arkansas, northwest Mississippi and west Tennessee. It is one of the top ten distribution centers in America and has spent the last decade building infrastructure to support its economic base. The Memphis International Airport is the largest air cargo facility in North America and ships over one million tons a year. The International Port of Memphis is the fourth largest inland port in the United States. Memphis has attracted many new jobs and the employment centers are hiring to keep pace with the distribution industry. This new growth has resulted in new warehousing and the development of new industrial parks and the expansion of existing industrial parks in both Tennessee and Mississippi. The expansion of the Frank C. Pidgeon Industrial Park in West Memphis, along with the North Memphis Industrial Park, the West Tennessee Business Center in Millington and the Chickasaw Industrial Park in northern Mississippi, have the potential to add over 75,000 new jobs in the Memphis growth area. These emerging and already established employment centers are generating extensive residential growth north, east, southeast, and south of Memphis. Fayette, Marshall, and DeSoto Counties are experiencing similar growth. Because of the region’s importance as a transportation and distribution hub, this growth is likely to
continue for decades. This new development will require needed support services and an adequate transportation system to afford people a reasonable commuting time to employment centers, as well as a safe and efficient means to move people and goods in and around the Memphis area.

**Alternatives Considered**

The alternatives considered for this project were selected based on the results of eight public involvement meetings, field reviews using aerial photography and USGS topographic maps, reviewing documented environmentally sensitive areas and constraints and input from other agencies as part of the scoping process. Recent traffic studies and the evaluation of future growth patterns in the project impact area were also factors in the selection of the alternative alignments.

A Technical Advisory Committee (TAC) consisting of representatives of the Tennessee and Mississippi Departments of Transportation, the Memphis Metropolitan Planning Organization, and the Federal Highway Administration from Tennessee and Mississippi was formed to evaluate information gained from the project studies and to make decisions regarding project development. The project alternatives selected for study, including the No-Build Alternative and those eliminated were approved by the TAC.

In the early phase of project development for this segment of I-69, two alternative corridors with a common beginning point at the I-55 Interchange in Hernando and a common ending point at the intersection of US 51/SR 385 in Millington were evaluated. One corridor passed through Memphis, the other bypassed Memphis to the east. As the study progressed and after evaluating traffic patterns and growth patterns in the surrounding area, it became apparent that neither a single route through Memphis, nor a single route bypassing Memphis to the east would meet the purpose and need of this segment of I-69.

Studies of the projected I-69 traffic and freight movement show that a large volume of the I-69 commercial traffic will have an origin or destination in Memphis. Recent traffic studies also indicate that a majority of traffic on the existing system through Memphis is local traffic and that
the interstates currently operate at congested levels during peak hour periods. During the congested periods, through traffic on I-69 with destinations either north or south of the city and traffic destined for the major highways leaving Memphis to the east are not adequately served without an eastern bypass route. Also, since a large volume of traffic is destined for the downtown Memphis area, a single bypass route to the east does not meet the purpose and need of I-69. Since a single route will not meet the purpose and need of this segment of I-69, a Systems Approach Alternative was proposed.

The No-Build Alternative and a Systems Approach Alternative that involves constructing two routes, one through town and a bypass route to the east, were fully evaluated in the DEIS and FEIS for this project.

No-Build Alternative
The No-Build, or No-Action Alternative, involves not building SIU 9 and leaving the existing roadway system in place. The widening of I-55 from Hernando, Mississippi to the state line would continue, as well as other ongoing improvements to I-240 and I-40 through Memphis. The construction of SR 385 and other planned improvements in the area independent of I-69 would be implemented along with other normal maintenance activities.

Systems Approach Alternative
In order to meet the purpose and need of I-69 and provide an adequate route for the movement of freight between Canada and Mexico through Memphis, as well as freight movement in Memphis and serve the anticipated traffic growth in this region, a Systems Approach Alternative was proposed. The Systems Approach Alternative will provide a route through Memphis, as well as a bypass route to the east of Memphis. It will utilize sections of existing interstates and state highways built to interstate standards. It will also require the construction of two new sections of interstate. It will connect approximately 100 miles of existing interstate and existing and proposed state highways into one complete system and will benefit far more businesses and people than a single route through Memphis or a single eastern bypass. It will provide an adequate level of traffic service to move people and freight in a safe and efficient manner in and around the Memphis area.
Approximately 55 miles of the proposed **Systems Approach Alternative** is already in place. This project will result in the construction of approximately 45 miles of new interstate construction; one 15-mile section north of Memphis, and a 30-mile section southeast of Memphis (See Project Location Map Figure 1).

The **Systems Approach Alternative** will begin at the I-55/MS 304 Interchange in Hernando and involves utilizing existing I-55, I-240, and I-40 through Memphis to US 51. A new 15 mile, 4-lane divided section of interstate will be constructed from US 51 north to connect with existing SR 385 in Millington. The existing section of SR 385 that extends south from Millington to I-40 and the proposed SR 385 alignment that extends south of I-40 to Collierville will be utilized as part of the eastern bypass segment. A new (approximately) 30 mile long 4-lane divided section of interstate will be constructed from SR 385 south of Collierville to connect with the I-55/MS 304 Interchange in Hernando, connecting the entire system. This **Systems Approach Alternative** will have interchanges with all intersecting State highways and major roadways around the Memphis area (See Project Location Map, Figure 1). No improvements to I-55, I-240, I-40 or SR 385 will be made as a result of this project. The existing section of SR 385 at Millington was previously built to interstate standards, and the new section currently under construction south of I-40 to Collierville will also be built to interstate standards. The on-going improvements to I-55, I-240, I-40, and SR 385 are separate and independent projects that have their own funding and approved environmental documents. The environmental impacts associated with these projects has been well documented and appropriate mitigation measures are being implemented. The only changes to these projects as a result of the proposed I-69 project will be the new interstate designation signs.

Since the **Systems Approach Alternative** requires two new construction segments, one north of Memphis, and the other southeast of Memphis, to connect the entire system and meet the overall national and local purpose and need for the project, the segment that follows I-55, I-240, and I-40 north through Memphis will be designated I-69. It is proposed to designate the segment that bypasses Memphis to the east as I-269.
In evaluating this **Systems Approach Alternative**, two new location alternative alignments were evaluated for the 15 mile northern section, proposed I-69, and three new location alternative alignments were evaluated for the 30-mile southeast section, proposed I-269.

**Proposed I-69**

In evaluating the 15-mile new location section of proposed I-69, two alternative alignments were studied, A1 and A3 (See Location Map, Figure 1). As previously stated, the proposed I-69 route through Memphis begins at the new I-55/MS 304 Interchange currently under construction in Hernando, Mississippi and follows I-55, I-240, and I-40/240 through Memphis to US 51. Both alternative alignments share this common alignment. The existing cross-sections of I-55, I-240, and I-40/240 through this area vary from 4-lane section to 8-lane sections. Some sections of the existing roadway have recently been upgraded to eight 12-foot traffic lanes, some sections are currently under construction and other segments are in various planning stages of upgrade. Along these existing sections, no new right-of-way will be needed for the I-69 project.

**Alternative A-1**

Beginning at the SR 300/US 51 Interchange, Alternative Alignment A-1 extends west for approximately 0.7 mile on new location before shifting north and crossing over the Loosahatchie River and floodplain. It continues north on new location for approximately 14 miles. It traverses mostly open land, some forested areas and scattered residential areas. It passes behind the BFI landfill and ends at a proposed interchange with SIU 8 at Millington. This alternative will cross several existing and proposed landfills. Alternative Alignment A-1 is approximately 15.2 miles in length. It will displace 21 families and two businesses. It crosses 21 streams and will result in the unavoidable fill of 48 acres of wetlands in the Wolf River and Loosahatchie River watersheds. It will also require the conversion of 128 acres of farmland to interstate right-of-way.

**Alternative A-3**

Alternative Alignment A-3 begins at the same location as Alternative Alignment A-1 and is coincident with A-1 to just south of the Loosahatchie River. Alternative Alignment A-3 does not cross the river at this point; it remains on the east side; it passes through agricultural land,
forested land, several landfills, and a portion of a mobile home park. The alignment joins existing US 51 near the SR 388 intersection in Frayser. It passes just east of Firestone Park and continues along US 51 through the commercial area of Frayser. Alternative Alignment A-3 then crosses the Loosahatchie River and associated wetlands adjacent to existing US-51. After crossing the river it extends north on new location through the Woodstock Community traversing some scattered residential areas and open land, ending at a proposed interchange with SIU 8 at Millington. This alignment is approximately 15.3 miles in length; it displaces 60 families and 5 businesses. It crosses 20 streams and will result in the unavoidable filling of 53 acres of wetlands in the Wolf River and Loosahatchie River watersheds. It will also require the conversion of 95 acres of farmland to highway right-of-way.

The proposed roadway cross-section for the new location alignments (A-1, A-3) will have four 12-foot wide traffic lanes separated by an 88-foot wide median within a minimum 300-foot right-of-way. Auxiliary lanes will be provided as needed between the proposed interchanges to accommodate merging traffic. The segment of Alternative Alignment A-3 that extends along existing US 51 through Frayser will have four 12 foot thru lanes separated by a 22-foot wide median with a concrete median barrier within a minimum 300 foot right-of-way. Auxiliary lanes will be provided as needed between interchanges to accommodate merging traffic. The segment on new location north of Frayser will be the same as Alternative Alignment A-1. Interchanges are proposed at all State routes and major roadways.

**Proposed I-269**

In evaluating the 30-mile new location segment of proposed I-269, three new location alternatives were evaluated, B-1, B-2, and B-3. The proposed I-269 route (eastern bypass) also begins at the new I-55/MS 304 Interchange in Hernando, Mississippi. The three proposed alternative alignments extended east on new location and shared the same alignment for approximately 1.2 miles, then split into two separate alignments, B-1 (B-3), and B-2 (Reference the Location Map Figure 1).
Alternative B-1
Alternative Alignment B-1 continues east crossing mostly farmland and open land, as well as creeks, scattered woodlands and residences. It crosses the Coldwater River and associated wetlands and heads north to Collierville, crosses the Coldwater River again and connects with the previously approved section of SR 385 south of Collierville. It then follows the approved SR 385 alignment to I-40 and then follows existing SR 385 to the end of the project in Millington and ties into a proposed interchange with SIU 8. Alternative Alignment B-1 is approximately 28.6 miles in length. It will displace 57 families and 6 businesses. It crosses 39 streams and will result in the unavoidable fill of 69 acres of wetlands in the Coldwater River watershed. It will convert approximately 435 acres of farmland to roadway right-of-way.

Alternative B-2
Alternative Alignment B-2 separates from Alternative Alignment B-1 approximately 1.2 miles east of I-55 and extends south, then east, crossing over the Coldwater River, traversing open land with scattered residences, farmland and forested areas. It rejoins Alternative Alignment B-1 at the proposed US 78 Interchange at the DeSoto/Marshall County line and then extends north to follow the same alignment as B-1 to the end of the project in Millington. Alternative Alignment B-2 is approximately 30.6 miles in length. It currently displaces 53 families and 6 businesses. There are several new subdivisions being developed along this alignment. B-2 has the potential to displace an additional 100+ residences. It crosses 46 streams and will result in the unavoidable filling of 51 acres of wetlands in the Coldwater River watershed. It will require the conversion of 497 acres of farmland to highway right-of-way.

Alternative B-3
Alternative Alignment B-3 is coincident with Alternative Alignment B-1 from the beginning of the project to a point approximately 10.6 miles east; it then extends north to follow the northern floodplain of the Coldwater River. This alignment traverses open farmland, forested areas and scattered residential sites. It also passes through the Forest Hill Community, a recently developed residential area that contains many new homes and a new elementary school. There are 1,600 residential lots in this planned community. Alternative Alignment B-3 joins Alternative Alignments B-1 and B-2 approximately 3,000 feet north of the MS 302 Interchange.
and follows the same route to the end of the project in Millington. This alternative alignment is approximately 26.6 miles long. It currently displaces 52 residences and one business. Because of the rapid residential development along this alignment, it has the potential to displace several hundred additional residences. It crosses 37 streams and will result in the unavoidable fill of 6 acres of wetlands in the Coldwater River watershed. It will require the conversion of 253 acres of farmland to highway right-of-way.

The proposed cross-section for these new location corridors will consist of four 12-foot traffic lanes with a 64-foot wide median within a minimum right-of-way width of 300 feet. Interchanges are proposed at state routes and major roadways.

**Preferred Systems Approach Alternative**
During the project development process, a wide range of alternatives were identified as possible alignments for this segment of I-69. Alternatives were analyzed for their ability to meet the purpose and need, financial feasibility and potential social, economic, and environmental effects.

A preferred alignment for the northern I-69 segment and the southern I-269 segment have been selected (Reference the Preferred Alternative Location Map, Figure 2). This selection was made based on information contained in the DEIS, noise studies, wetland and ecological studies, and other technical studies and on evaluating information obtained through an extensive public involvement process and agency coordination prior to publication of the DEIS. It was also based on the comments received on the DEIS and concerns raised by local residents attending the Corridor Public Hearings. It involved evaluating several design options aimed at resolving local concerns expressed in comments at the Corridor Hearings.

**Proposed I-69 Preferred Alternative**
Alternative Alignment A-1 was selected as the preferred alignment for this segment of the **Systems Approach Alternative** for the following reasons:

- The alignment is slightly shorter and requires less right-of-way.
- A-1 displaces fewer families and businesses and is estimated to cost $20 million less than A-3.
BLUE: SYSTEMS APPROACH ALTERNATIVE
BLUE DASHED: PREFERRED ALTERNATIVE
GRAY: NON-PREFERRED ALTERNATIVE

FIGURE 2
Preferred Alternative Location Map
• It avoids impacting the trailer park on Old Millington Road and is further away from concentrated neighborhoods in the Benjestown Road area.
• Alternative A-1 avoids construction impacts associated with providing ingress and egress to local businesses along US 51 through Frayser during the construction phases.
• Alternative A-1 avoids the construction congestion associated with building an interchange at the existing US 51/SR 388 (North Watkins Street) intersection in Frayser and maintaining local traffic through this busy intersection.
• It will not impact access to the Vietnam Memorial Park or access to Firestone Park during project construction.
• It is further away from the Woodstock Community which will result in less congestion along US 51 in the vicinity of Woodstock during construction.
• There will be less noise impacts along the A-1 alignment.
• Alternative A-1 impacts less wetland acres.
• Alternative A-1 was preferred by local residents and received the most support at the Corridor Public Hearing.

Proposed I-269 Preferred Alternative
Alternative Alignment B-1 has been selected as the preferred alignment for the I-269 segment of the Systems Approach Alternative. The I-269 corridor is presently experiencing a significant increase in residential development and other infrastructure construction. Many new homes have been constructed since the beginning of this study which is directly related to the availability of developable land and the economic growth in this region.

Each of the alternative alignments studied have similar social, economic, environmental, and land use impacts. Alternative B-3 is the shortest route and follows the edge of the Coldwater River floodplain. Because the land in this area is above the floodplain, it is the most desirable for residential development, and as a result it is undergoing rapid change. Since the beginning of this study, a 1,600 lot planned residential community has developed. A new elementary school and fire station have been constructed. The alignment was shifted to miss the school; unfortunately it separates the school from the community it is designed to serve. The on-going rapid development of this planned community places many of the new homes in the path of the
B-3 alignment. This planned community will be completed before funding is available for I-69 and will result in several hundred residential displacements, which will significantly increase the cost of the project and divide this community, as well as cause significant noise impacts on the homes adjacent to the interstate. Shifting the alignment further south will impact other new subdivisions currently under construction and have a greater impact on the Coldwater River floodplain. Shifting the alignment further north would have a greater impact on existing residential development. B-3 also passes through a new subdivision under development south of Burke Road, as well as another new 200± lot subdivision under development on Smith Road. B-3 in this area would divide these residential areas, displace many homes and would have a noise impact on those left adjacent to the interstate. B-3 was opposed by a large majority of the public attending the Corridor Public Hearing, as well as local elected officials in the area; for these reasons B-3 was not selected. (The Corridor Public Hearing Summary is available at TDOT and MDOT offices).

Alternative B-2 is the longest of the three alignments studied and has the highest estimated cost. B-2 also has the potential to adversely impact new residential development in the area. It passes through the corner of a new subdivision (estimated to be 100± lots) currently under construction on Getwell Road. It also passes just south of a new subdivision (estimated to be 50± lots) under development on Fairview East Road. These new housing developments will be complete before the construction of this segment of I-69 begins. B-2 would displace many of these new homes and subject those left adjacent to the interstate to traffic noise impacts. For these reasons B-2 was not selected.

In consideration of the on-going development in this region and the impacts associated with each alternative along with public comments made at the Corridor Public Hearings and support of local officials, Alternative Alignment B-1 was selected as the preferred alignment.

Alignment B-1 closely follows MDOT’s previously proposed MS-304 alignment that was presented at local public meetings. The three alignments proposed for the I-269 route were field located in an attempt to avoid as many existing environmentally sensitive areas, houses, businesses, churches, and other infrastructure as possible, to minimize the impact of this project.
The alignments were shifted during the course of this study to avoid new development as it occurred. Although Alternative B-1 was initially estimated to displace 64 families which is slightly higher the Alternatives B-2 and B-3, there are no new subdivisions currently under development in the path of B-1. This alignment is supported by local elected officials who have the authority to approve land use zoning to control future residential development in this area. Alternatives B-2 and B-3 due to the previously discussed on-going development will displace more houses and other infrastructure than the preferred alignment.

Alternative B-1 will displace more wetlands than Alternative B-3. The B-3 alignment was selected for this study because it was above the Coldwater River floodplain and avoided many wetlands. However, because of this desirable location new housing development is rapidly occurring. A new 1,600+ lot planned residential community is currently under construction in the path of Alternative B-3. Alternative Alignment B-3 has the potential to displace several hundred of these new homes. It would split the community and be very close to a recently constructed elementary school.

Alternative B-1 is more economically beneficial to the City of Byhalia and Marshall County. It will provide access to more land for local development. It will increase the tax base and improve the quality of life. It will provide better traffic service to existing industrial and residential development in the area. Alternative B-1 has been endorsed by the Northern Mississippi Industrial Development Association, Marshall County Industrial Development Authority, Marshall County Board of Supervisors, the Byhalia Chamber of Commerce and the town of Byhalia. It will provide very much needed economic relief to this area.

A more detailed description of the alternative alignments studied can be found in Chapter 2 Alternatives.

The following table (Table 1) is a comparison of the alternative alignments on new location. Since much of SIU 9 is on existing interstates and highways or on roadways previously approved for construction, the data presented is only for the new location alternative alignments.
Project Impacts

Land Use Impacts
The impacts to land use are very similar for all of the new location alignments studied including the preferred alternative alignments. Land use would change as land currently in agricultural use, open farmland or other uses, is converted to highway right-of-way. Because the proposed roadway is access controlled, secondary development resulting from the proposed roadway is most likely to occur at the proposed interchanges with the state routes and major roadways it crosses. Development pressure would be focused on areas around the proposed interchanges, although not all interchanges are likely to develop in the foreseeable future.

The cumulative impact to land use involves the conversion of land from agricultural use and open space to residential, commercial and industrial uses. This conversion is already occurring at a rapid rate at various locations in the project area. Based on a review of land use plans prepared by the surrounding communities, as the population rate increases and job opportunities increase it is likely that the need for more residential and commercial development will continue for decades. These land use changes will result in the loss of wildlife habitat, wetlands, forested areas, farmland, as well as impact the floodplains of the surrounding rivers and streams. The number of acres of potential loss can not be accurately determined at this time. The actual size and number of future development projects and the likelihood of these actions being permitted is unknown.

Economic Impacts
None of the alternative alignments studied would have an adverse impact on the local economy. All of the alternatives including the preferred alternative alignments would displace a small number of businesses, however businesses similar to those displaced would remain in the area and there are sites available should the displaced businesses choose to relocate in the project area. The proposed project will have a beneficial secondary impact on the local economy by supporting the local governments’ efforts to recruit new industrial, retail, and other facilities to the project area. The expansion of existing industry and new industry will increase area tax revenues and provide jobs. The cumulative impact will be an increase in the tax base in the surrounding communities through new development.
Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, February 11, 1994 requires that the evaluation of Federal actions identify and address disproportionately high and adverse human health and environmental impacts on low income and minority populations. The evaluation of the preferred alternative alignments has not revealed any disproportionately high concentration of low-income and/or minority populations along the alternative alignments. The preferred alternative alignment would not change the basic social arrangement or character of the project area and would not create a barrier to social interaction. No impact on school districts or churches is foreseeable. Consequently, the project would not have a disproportionately high and adverse effect on those population groups.

Hazardous Materials

Although no hazardous material sites have been identified within the proposed right-of-way, additional studies of the land fill sites within the proposed right-of-way will be conducted to determine the contents and extent of materials and the specific impacts to the land fill site. In the event that hazardous substances or wastes are encountered within the proposed right-of-way of the preferred alternative alignments, their disposition shall be subject to the applicable sections of the Federal Resources Conservation and Recovery Act (RCRA), as amended, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended and the Tennessee Hazardous Waste Management Act of 1983.

The preferred alternative alignments will involve the removal of buildings and has the potential for encountering friable asbestos. Pursuant to the TDOT Standard Specifications for Road and Bridge Construction (March 1995), the construction contractor must notify the Tennessee Department of Environment and Conservation (TDEC) prior to the demolition of any building in accordance with TDEC policy and regulations. All structures containing friable asbestos must be demolished in accordance with these regulations and policies.
Protected Species
The proposed project will not impact any Federal listed threatened or endangered species or critical habitat. The proposed project is in compliance with Section 7 of the Endangered Species Act.

Cultural Resources Impacts
There are no archaeological or historical properties listed on or eligible for the National Register of Historic Places located along the preferred alternative alignments. SIU 9 of proposed I-69 is in compliance with Section 106 of The National Historic Preservation Act of 1966.

Section 4(f) Impacts
The proposed project does not involve the use of publicly owned land from a park, recreation area, or wildlife refuge, or any land from a historic site of national, state, or local significance. The proposed project (SIU 9) is in compliance with Section 4(f) of the Department of Transportation Act of 1966.

Executive Order 11990 Wetland Impacts
All of the new location alternative alignments evaluated for this segment of I-69 (SIU 9) involve the unavoidable filling of wetlands (See Table 1). Early in the planning phase an effort was made to field locate all the alternative alignments studied to avoid wetlands or minimize the impact to the extent practical. Until a ground survey is completed and roadway plan development is underway, the precise level of wetland impacts and appropriate mitigation can not be determined. The unavoidable impacts to wetlands will be mitigated at an approved wetland site. There are several wetland mitigation banks governed by approved “Wetland Banking Agreements” located in the affected watersheds that could be used to mitigate the unavoidable wetland impacts. On past projects, when use of wetland banks was authorized by the wetland Mitigation Banking Resource Team (MBRT), which is made up of Federal and State resource and permitting agencies, the mitigation ratio has been a minimum 2:1 for wetlands replaced inside the watershed and a minimum 4:1 for replacement of wetlands impacted outside the watershed. A listing of the type wetlands impacted, their size and functional value are contained in Chapter 4 under Wetland Impacts. TDOT and MDOT will work with the
appropriate permitting agencies and follow established wetland banking procedures to determine if the use of the wetland banks is appropriate for this project and determine the level of mitigation required. A detailed mitigation plan will be developed in consultation with resource and permitting agencies during the design and permitting phase of the project.

Permits Needed
The preferred alternative alignments will require both State and Federal Water Quality Permits for stream crossings and wetland impacts. Section 404 permits from the USACE, National Pollution Discharge Elimination System (NPDES) permits, and Tennessee and Mississippi State Water Quality Permits will be needed. TDOT and MDOT will coordinate mitigation efforts with Federal and State regulatory agencies before preparing final mitigation plans and submitting permit applications. It is during the permitting process phase that the appropriate compensatory mitigation for the unavoidable impacts of this project will be determined.

Other Major Actions
There are several projects under development along the Systems Approach Alternative Corridor that will be incorporated into the overall I-69 route. The Mississippi Department of Transportation is presently constructing a new I-55/MS 304 Interchange in Hernando that will be the beginning point for SIU 9. MDOT will also be widening I-55 to eight lanes from Hernando to the state line. TDOT has under development the widening of I-240 to eight lanes from the I-55/240 Interchange to the I-40/240 Midtown Interchange. There is also another approved project currently under construction to widen I-240 to eight lanes from the I-40/240 Midtown Interchange to SR 300. With the construction of these projects, there will be an eight-lane facility that extends from Hernando, Mississippi north through the city of Memphis ending at the junction of US 51 and SR 300 just south of Frayser, Tennessee.

Another project TDOT is committed to build is a new segment of SR 385 east of Memphis. This project will connect with a previously constructed segment of State Route 385 constructed to interstate standards that extends from I-40 north to Millington. The new segment begins at the existing I-40/SR 385 Interchange and extends south to Collierville and connects with Nonconnah
Parkway. This project has an approved Final Environmental Impact Statement and sections of the new roadway are currently under construction.

All of these improvements are separate projects, they have their own funding and environmental documentation that discussed the environmental impacts of each project, and they are not dependent on the approval of I-69. The environmental impacts associated with these projects have been evaluated and the appropriate mitigation measures have been implemented. Copies of the environmental documents are available at TDOT and MDOT offices. All of these projects are included in the current 2026 Long Range Transportation Plan that has been adopted and found to be in conformity with the Clean Air Act. This segment of I-69 (SIU 9) will be routed over these roadways, however no additional lanes will be added and no new right-of-way is required. The only changes to these roadways will be the interstate signing.

SAFETEA-LU Statute of Limitations
“A Federal Agency may publish a notice in the Federal Register, pursuant to 23USC§139(1), indicating that one or more Federal agencies have taken final action on permits, licenses, or approvals for a 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 180 days after the date of publication of the notice, or within a 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 the Federal laws governing such claims will apply.”
### TABLE I

#### SUMMARY OF ALTERNATIVES

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*Impacts are based on a 300-foot wide corridor.
*Cost data has been updated since the Draft EIS to reflect the most recent cost estimates.
*Because of the recent residential development along this alignment, B-3 has the potential to displace several hundred new homes in the Forest Hill Community subdivision.
†Does not include future noise impacted residences in the Forest Hill Community subdivision.