



# COMMUNITY-BASED MITIGATION PLAN OVERVIEW

## INTERSTATE 40/STATE ROUTE 194 (PROJECT BLUE OVAL) ENVIRONMENTAL ASSESSMENT

*Haywood, Tipton, and Fayette Counties, Tennessee* | SPRING 2024

### PROJECT OVERVIEW

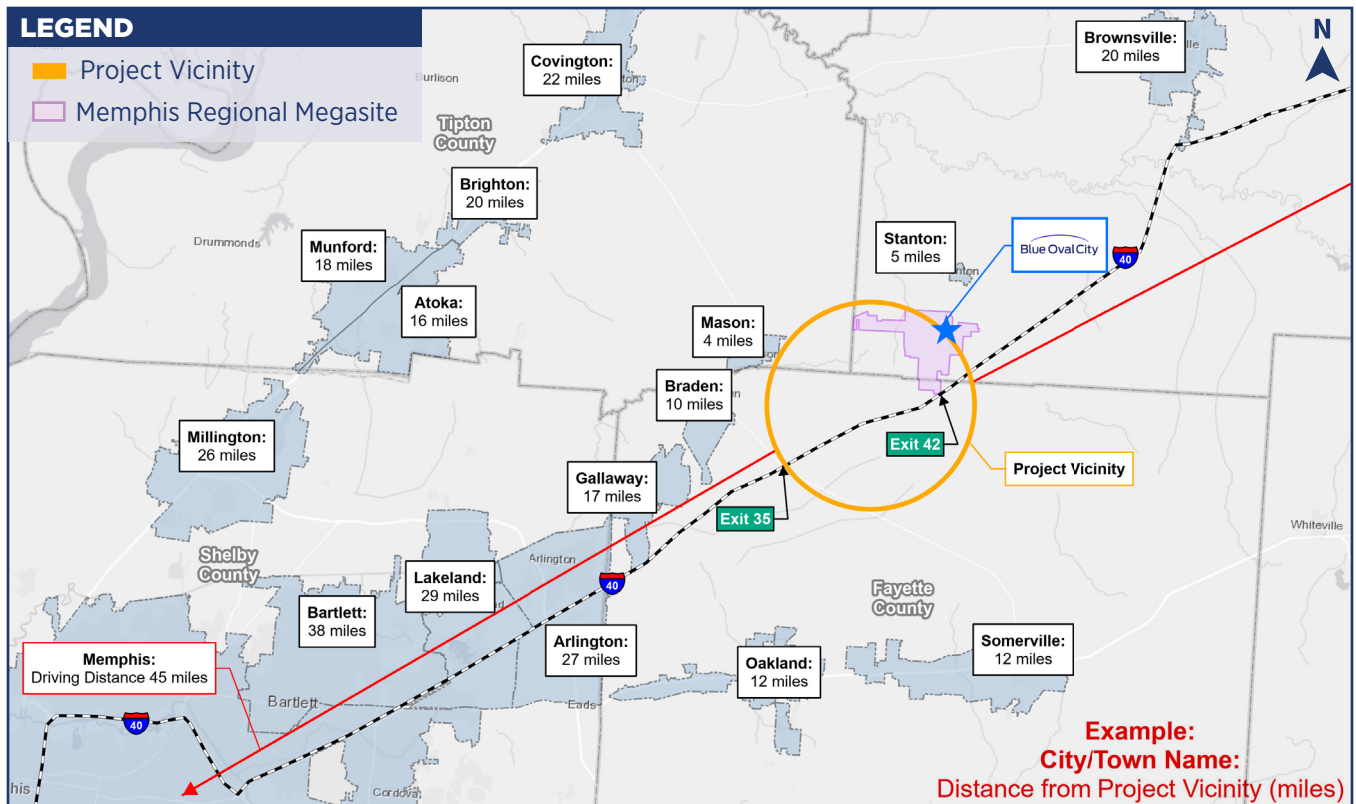
The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA), proposes various roadway improvements in Fayette, Haywood, and Tipton Counties. The roadway improvements are being considered to serve the imminent industrial development at the Ford Motor Company Campus (Blue Oval City), located at the Memphis Regional Megasite in Haywood County, Tennessee.

Because the proposed project involves a new connection to an interstate facility, the project is subject to the requirements of the National Environmental Policy Act (NEPA). TDOT and FHWA are preparing an Environmental Assessment to identify and evaluate the environmental effects of the proposed project and to identify measures to minimize harm.

As part of the development of the Environmental Assessment, TDOT and FHWA determined that the overall population of the areas in and surrounding the Ford Motor Company Campus (Blue Oval City), all contain Environmental Justice (i.e., minority and low-income) populations. Because minority and low-income individuals comprise the majority of the population within the affected project area, TDOT and FHWA determined that there are very likely disproportionate impacts to the minority and low-income community since any impacts from the project are most likely being predominantly borne by the minority and low-income community.

To mitigate impacts of the project on the overall community and provide opportunities for the impacted community to suggest or identify potential mitigation strategies, TDOT is proposing the development of a Community-Based Mitigation Plan.

# I-40/SR-194 (PROJECT BLUE OVAL) ENVIRONMENTAL ASSESSMENT (PIN 132132.01)- PROJECT VICINITY MAP



## PROJECT BACKGROUND

The 4,100-acre Memphis Regional Megasite was developed by the Tennessee Valley Authority (TVA) in 2006 and was ultimately purchased by the State of Tennessee in 2009. Currently, one existing interstate interchange serves the Memphis Regional Megasite at SR-222 (Exit 42). In addition, north-south connectivity from the existing roadway network is limited in this portion of northwest Fayette County with SR-222 being the only north-south route with a direct connection in and around the Memphis Regional Megasite.

On September 27, 2021, Governor Bill Lee announced that the Ford Motor Company had selected the Memphis Regional Megasite for a vehicle and battery manufacturing campus. The Ford Motor Company Campus (Blue Oval City) is expected to occupy approximately six square miles and will encompass vehicle assembly, battery production, and a supplier park.

In total, Blue Oval City will employ approximately 6,000 people between the electric vehicle manufacturing facility and battery manufacturing facility\*, which is anticipated to increase travel demand for commuter traffic once site operations are underway. In addition, the amount of freight traffic both entering and exiting the Memphis Regional Megasite is anticipated to increase when the Memphis Regional Megasite is fully developed and operational.

While the Ford Motor Company Campus (Blue Oval City) would be entirely confined to the existing Memphis Regional Megasite, additional industrial, commercial, or residential development is anticipated to be developed at or near the Memphis Regional Megasite in the future. The anticipated additional industrial, commercial, and/or residential development is expected to result in increased commuter and freight traffic, which would further increase the travel demand within the existing roadway network.

\*Source: BlueOval City FAQs (<https://corporate.ford.com/operations/blue-oval-city/faqs.html>)



## ENVIRONMENTAL ASSESSMENT

As previously mentioned, TDOT and FHWA are in the process of preparing an Environmental Assessment to identify and evaluate the environmental effects of the proposed project and to identify measures to minimize harm.

The proposed roadway improvements under consideration in the Environmental Assessment include a south-north extension of SR-194 (proposed SR-194 extension) on new alignment from the existing intersection at SR-59 and SR-194 in Fayette County to a new intersection with SR-1 (US-70/79) in Tipton County, a new interchange on Interstate 40 (I-40) at proposed Exit 39, and a portion of a west-east connector (proposed SR-468) on new alignment between proposed SR-194 and the intersection with existing Fredonia Road. The proposed improvements would total approximately 10.97 miles in length.

Because the proposed project involves a new connection to an interstate facility, the project is subject to the requirements of NEPA.

## ALTERNATIVES UNDER CONSIDERATION IN THE ENVIRONMENTAL ASSESSMENT

A No-Build Alternative and one Build Alternative are being evaluated in the Environmental Assessment. Each alternative is described in the subsequent text below.

### NO-BUILD ALTERNATIVE

The No-Build Alternative is required by federal regulations to be evaluated in the Environmental Assessment and provides a baseline for comparing against the other project alternatives. The No-Build Alternative would leave the project area surrounding the Memphis Regional Megasite as it currently exists, other than routine maintenance of the existing roadway system as needed.



## BUILD ALTERNATIVE

The I-40/SR-194 (Project Blue Oval) Environmental Assessment (PIN 132132.01), would focus on the following SIX design segments which make up the Build Alternative currently under study.\*

### DESIGN ELEMENT 1

Proposed extension of SR-194 from the intersection with existing SR-59 and existing SR-194 in Fayette County to the proposed SR-194/I-40 Interchange (Exit 39).

### DESIGN ELEMENT 2

Proposed SR-194/I-40 Interchange (Exit 39).

### DESIGN ELEMENT 3

Proposed SR-194 extension between the proposed SR-194/I-40 Interchange (Exit 39) and the intersection with proposed SR-194 and proposed Blue Oval City Connector (Proposed SR-468).

### DESIGN ELEMENT 4

Proposed intersection with proposed SR-194 and proposed Blue Oval City Connector (Proposed SR-468).

### DESIGN ELEMENT (Modified) 5

Proposed Blue Oval City Connector (Proposed SR-468) between the intersection with proposed SR-194 and the intersection with existing Fredonia Road.

### DESIGN ELEMENT 6

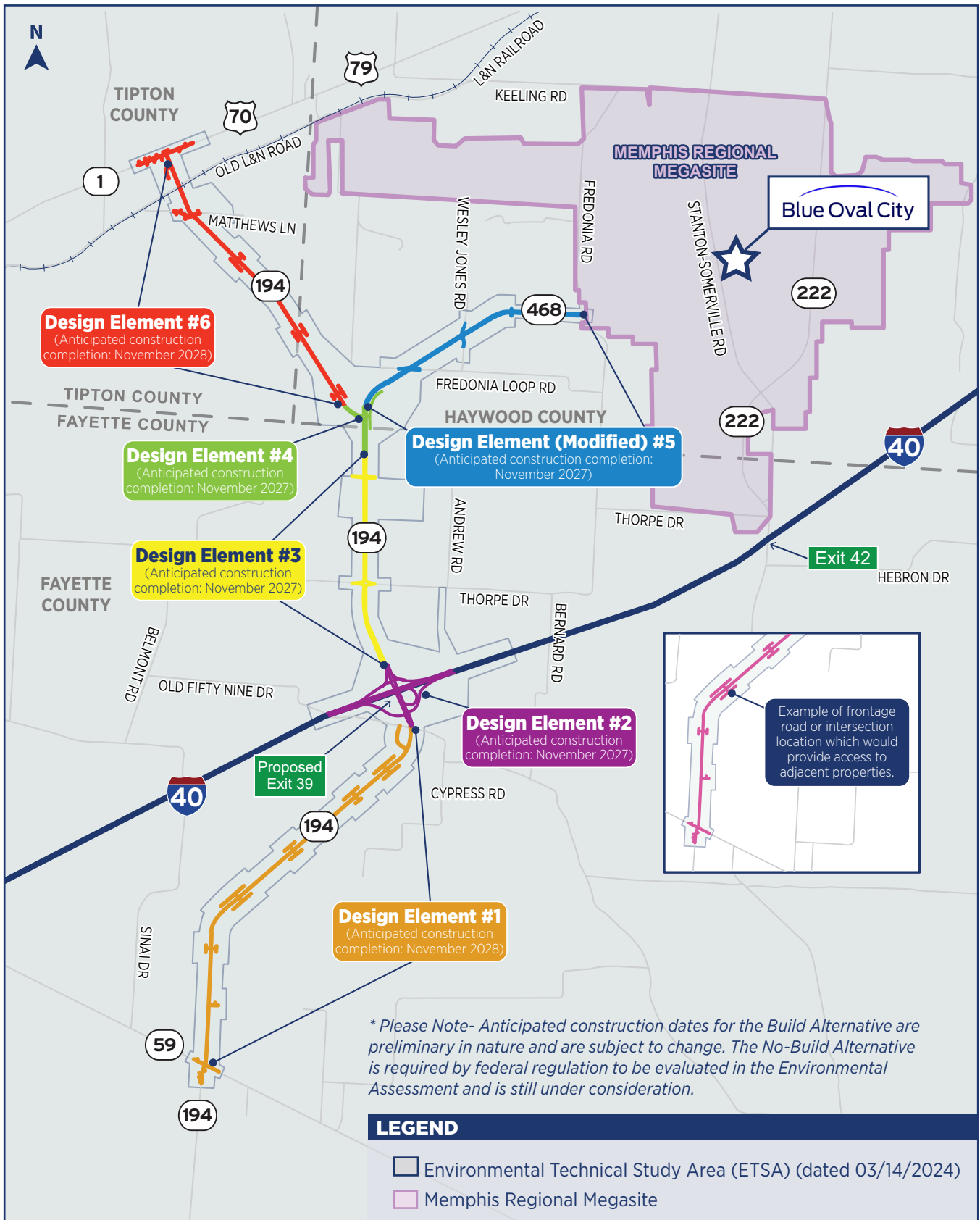
Proposed SR-194 extension between the intersection with proposed Blue Oval City Connector (Proposed SR-468) and the intersection with existing SR-1 (US-70/79).

*\*Please Note - Beginning in November 2021, TDOT began the process of development of the I-40/SR-194 (Project Blue Oval) Environmental Assessment (PIN 132132.01). TDOT originally proposed seven design elements under the Build Alternative, with the construction of Proposed SR-468 (Proposed Blue Oval City Connector between the intersection with Proposed SR-194 and the intersection with existing SR-222) being identified as Design Element #5 and modifications to the existing I-40, Exit 42 interchange being identified as Design Element #7. The total project length (including all seven design elements) was approximately 13.70 miles.*

*During the development of the environmental technical studies for the I-40/SR-194 (Project Blue Oval) Environmental Assessment (PIN 132132.01), TDOT decided to remove Design Element #7 (I-40, Exit 42 Interchange Modifications) and a portion of Design Element #5 (the eastern portion of Proposed SR-468, from Fredonia Road to SR-222) from consideration in the Environmental Assessment. TDOT developed a separate Tennessee Environmental Evaluation Report document for Proposed SR-468 (from Fredonia Road to SR-222, previously identified as a portion of Design Element #5 in the I-40/SR-194 (Project Blue Oval) Environmental Assessment) as well as improvements to existing SR-222. The Tennessee Environmental Evaluation Report was approved by TDOT on 12/02/2023. Additionally, TDOT prepared a Documented Categorical Exclusion for modifications to the I-40, Exit 42 Interchange (previously identified as Design Element #7 in the I-40/SR-194 (Project Blue Oval) Environmental Assessment). The I-40, Exit 42 Interchange Documented Categorical Exclusion was approved by FHWA on 02/28/2024.*



# I-40/SR-194 (PROJECT BLUE OVAL) ENVIRONMENTAL ASSESSMENT (PIN 132132.01), BUILD ALTERNATIVE



## PRELIMINARY ENVIRONMENTAL IMPACTS

TDOT is currently evaluating the environmental impacts related to the Build Alternative. The No-Build Alternative will also be carried forward, as a baseline against which to compare the Build Alternative.

As part of the I-40/SR-194 (Project Blue Oval) Environmental Assessment, environmental technical studies are being conducted based on an Environmental Technical Study Area which encompassed an area that was generally 150-500 feet on either side of the proposed Build Alternative's centerline in order to document natural, cultural, and community resources within a broader study area than the immediate project footprint. That way, if the Build Alternative's alignment shifts during the development of the proposed project, TDOT staff are aware of any resources that are present in that larger study area. The Environmental Technical Study Area for the Build Alternative encompasses approximately 1,924 acres.

Several environmental technical studies are still under development, the results of which will be formally published in the Environmental Assessment that TDOT is currently preparing. The public will be asked to provide comment on the anticipated environmental impacts during the Public Hearing which is tentatively scheduled for Quarter 1 of 2025\*.

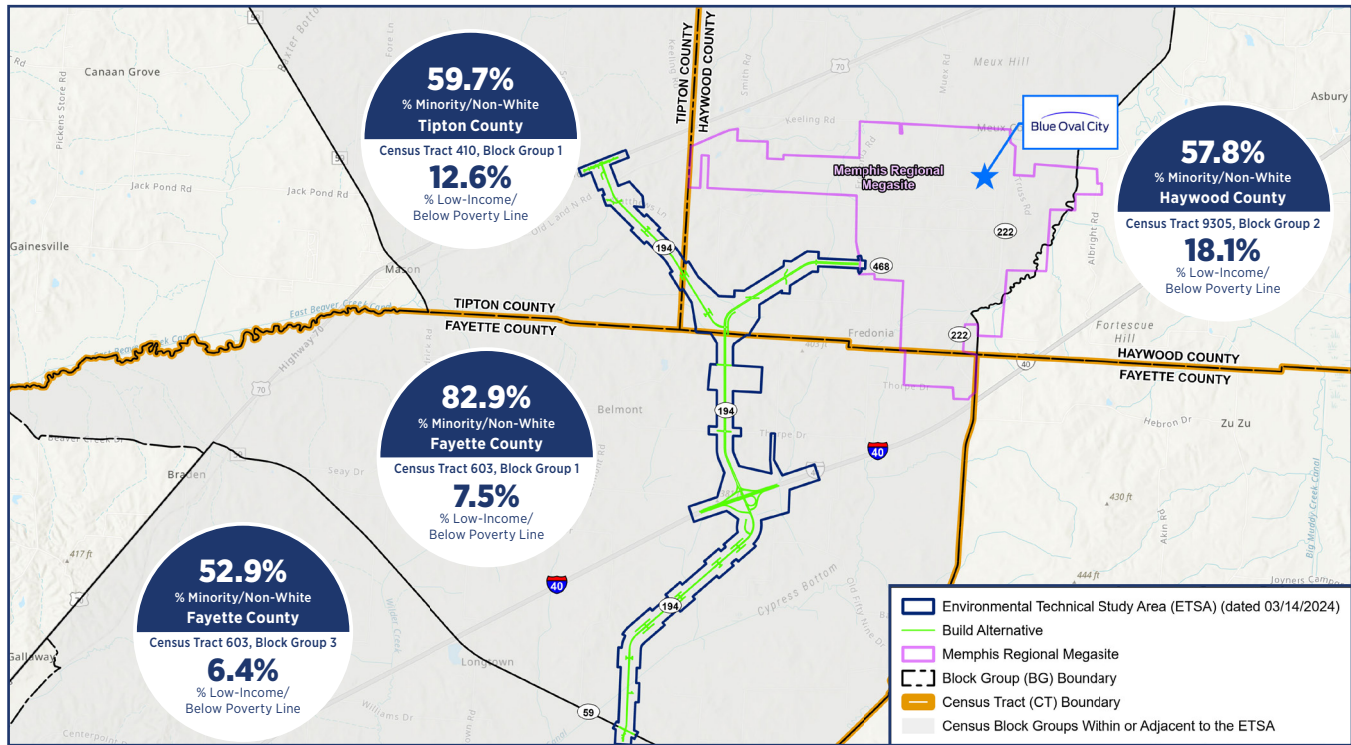
### Examples of environmental technical studies under development include:

- ★ Air Quality
- ★ Noise
- ★ Conceptual Stage Relocation Plan (Residential and Business Relocations)
- ★ Section 106 of the National Historic Preservation Act- Historic Architecture, Archaeology and Native American Consultation
- ★ Natural Resources- Threatened and Endangered Species, Streams, Wetlands, and Water Quality
- ★ Traffic Engineering Studies
- ★ Hazardous Materials
- ★ Farmland
- ★ Section 4(f)/Section 6(f)
- ★ Floodplains
- ★ Visual Impacts
- ★ Land Use and Transportation
- ★ Socioeconomic, Environmental Justice, and Economic Resources
- ★ Indirect and Cumulative Effects

*\*Note: This is a forecasted date only and is subject to change.*



# I-40/SR-194 (PROJECT BLUE OVAL) ENVIRONMENTAL ASSESSMENT (PIN 132132.01)- PERCENT MINORITY AND PERCENT LOW INCOME POPULATIONS BY CENSUS BLOCK GROUP



## ENVIRONMENTAL JUSTICE

Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations (1994)* requires FHWA and TDOT to develop a strategy for their programs, policies, and activities to avoid disproportionately high and adverse impacts on minority and low-income populations with respect to human health and the environment.

As outlined earlier, because minority and low-income individuals comprise the majority of the population within the affected project area, TDOT and FHWA determined that there are very likely disproportionate impacts to the minority community since any impacts from the project are most likely being predominantly borne by the minority community.

The purpose of the Community-Based Mitigation Plan is to facilitate meaningful engagement as intended under *Executive Order 12898, Federal Actions To Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations (1994)* and *United States Department of Transportation (USDOT) Order 5610.2C Final Order to Address Environmental Justice in Minority Populations and Low-Income Populations*, thereby ensuring full and fair participation by all potentially affected communities in the transportation decision-making process.

To mitigate impacts of the project on the overall community and provide opportunities for the impacted community to suggest or identify potential mitigation strategies, TDOT is proposing the development of a Community-Based Mitigation Plan.

**Based on feedback from the community received during previous outreach efforts, the Community-Based Mitigation Plan is framed around the following four (4) areas:**

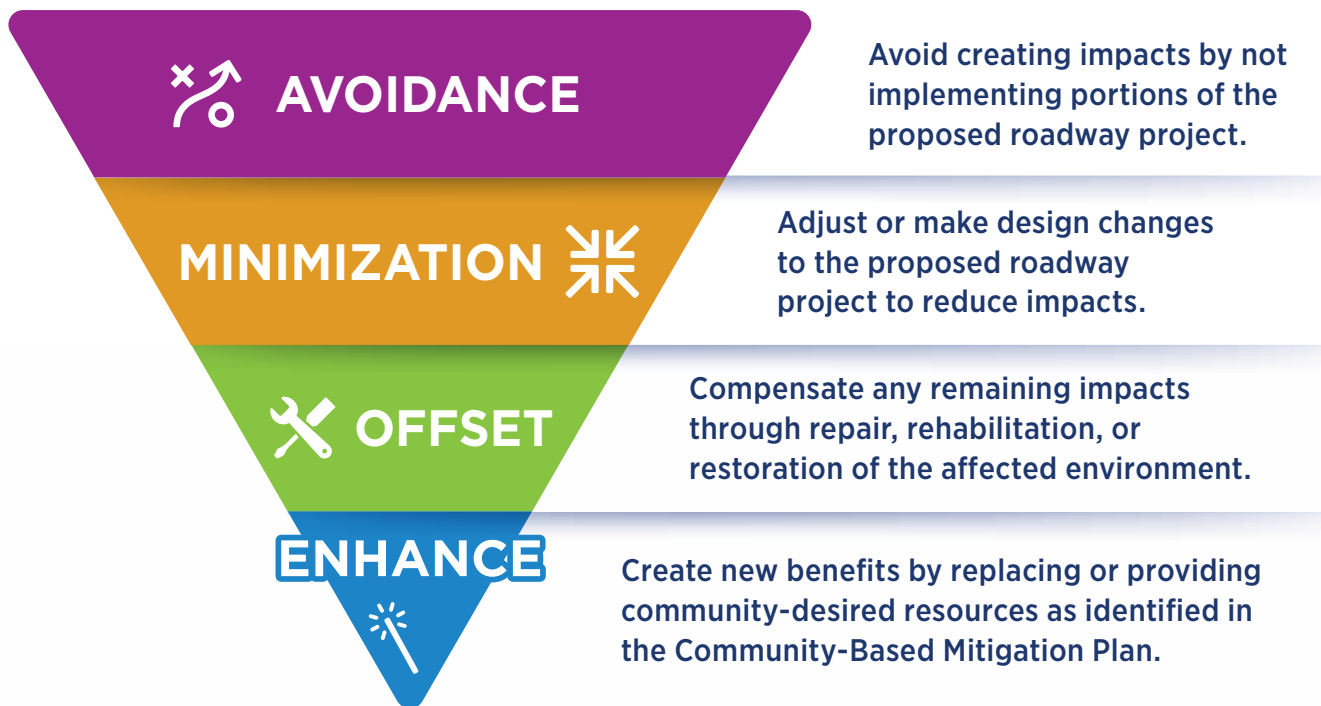
- ★ Community History / Preservation
- ★ Education / Job Training
- ★ Transportation / Multimodal
- ★ Community Enhancements



## MITIGATION

The environmental technical studies are intended to help TDOT make decisions that are based on an understanding of environmental consequences and take actions that protect, restore, and enhance the environment. Under NEPA, TDOT must use all practicable means and other essential considerations to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions on the quality of the human environment.

Based on the results of the initial environmental technical studies, TDOT has presently not identified any significant impacts resulting from the roadway improvements under the Build Alternative. However, mitigation of impacts must be considered whether or not the impacts are significant and TDOT is required to identify and include all relevant and reasonable mitigation measures in the Environmental Assessment.



## COMMUNITY-BASED MITIGATION PLAN

The development and implementation of the Community-Based Mitigation Plan is intended to establish trust between the community, TDOT, and FHWA, shed light on the environmental process, and assist in the implementation of measures that not only mitigate project impacts, but also address larger issues and priorities of directly-impacted residents and the larger community as a whole.

### COMMUNITY OUTREACH

TDOT and FHWA are conducting public outreach to gather input from community members on ideas for potential mitigation strategies via the attached Community-Based Mitigation Plan Survey. This outreach will provide the community with an opportunity to:

- ★ Share individual knowledge, experiences, and perspectives;
- ★ Provide input on community needs and project-related impacts;
- ★ Provide input to help prioritize the proposed mitigation measures; and,
- ★ Give community members a strong voice in the process.

### MITIGATION PROJECTS

TDOT and FHWA will review the community input and summarize the proposed mitigation strategies in a Draft Community-Based Mitigation Plan. The Draft Community-Based Mitigation Plan would include specific projects, anticipated funding, and identify (as appropriate) the entities responsible for implementation of the identified projects. Further, the Draft Community-Based Mitigation Plan would potentially identify additional projects that are beyond the scope of mitigation for Project Blue Oval.

The Draft Community-Based Mitigation Plan would be incorporated into the Environmental Assessment and made available to the public to review and provide comments on during the project's public hearing process. Any public comments and community preferences for the identified mitigation projects would be incorporated into the Final Community-Based Mitigation Plan that would be made a part of the final environmental document.

After approval of the final environmental document, TDOT would implement the mitigation projects outlined in the Final Community-Based Mitigation Plan and would be accountable for ensuring that the mitigation projects are completed within a reasonable timeframe.



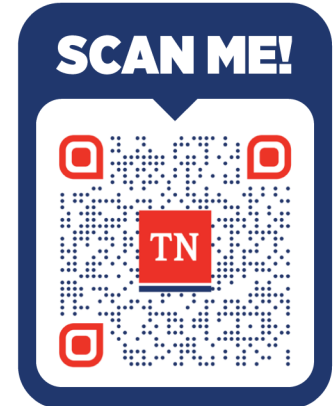
# WANT TO FIND OUT MORE INFORMATION ABOUT THE COMMUNITY-BASED MITIGATION PLAN FOR INTERSTATE 40/STATE ROUTE 194 (Project Blue Oval)?

## Want to ask a question or make a comment about the proposed Community-Based Mitigation Plan for the project?

Please use the following methods to make a comment or ask a question to the TDOT project team. Mitigation ideas and/or comments provided/postmarked by **July 15, 2024** will be included in the Draft Community-Based Mitigation Plan that TDOT is currently preparing.

- ★ **Toll Free Number** – Please call 1 (800) 558-6564 (toll free) and leave a voicemail to:
  - ★ **Ask a Question about the Project** – A TDOT representative will respond to your question within 7 business days.
  - ★ **Leave a Verbal Idea or Comment about the Proposed Mitigation** – If you require additional information before you provide an idea or make your comment, please request that information by **July 5, 2024**, so TDOT can be sure to get a response to you in time for you to provide your idea or comment by the deadline.
  - ★ **Request to be Added to the Project Outreach Database** – In addition to your name and number, please also leave your mailing address and email address.
- ★ **Community-Based Mitigation Plan Survey** – Please complete the postage paid Community-Based Mitigation Plan Survey included within this handout to provide your ideas and comments to TDOT. If you would rather provide your comment via the project website, please visit [tinyurl.com/ProjectBlueOval](https://tinyurl.com/ProjectBlueOval) to complete an electronic Community-Based Mitigation Plan Survey.
- ★ **Email** – Send an email to [TDOT.Exit39@tn.gov](mailto:TDOT.Exit39@tn.gov) by **July 15, 2024**
- ★ **Letter** – Mail a written statement by **July 15, 2024**, to the following address:

**INTERSTATE 40/STATE ROUTE 194 (BLUE OVAL PROJECT)**  
Kimley-Horn  
10 Lea Avenue, Suite 400  
Nashville, TN 37210



## PROJECT CONTACT



For further information regarding the Interstate 40/State Route 194 (Project Blue Oval) project, please contact:

### Mr. Steve Sellers

Tennessee Department of Transportation, Blue Oval City Program Manager  
Phone: 615.741.0786. | Email: [Steve.Sellers@tn.gov](mailto:Steve.Sellers@tn.gov)