



National Park Service
US Department of the Interior
Natchez Trace Parkway
Alabama

**FINDING OF NO SIGNIFICANT IMPACT
AND DECISION RECORD**
Replacement of the John Coffee Memorial Bridge (Tennessee River Bridge)

PEPC ID 99418

Recommended:

Wendy Hart Ross
Superintendent, Natchez Trace Parkway

Date

Approved:

Darrell L. Echols
Acting Regional Director, Interior Region 2, National Park Service

Date

INTRODUCTION

The National Park Service (NPS) prepared an environmental assessment (EA) to examine alternatives and environmental impacts associated with the proposed replacement of the John Coffee Memorial Bridge (Tennessee River Bridge or “bridge”) along the Natchez Trace Parkway (Parkway) in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4336 et seq.); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director’s Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making and its accompanying NPS NEPA Handbook^{1,2}.

The purpose of the project is to maintain a safe and reliable bridge crossing for users over the Tennessee River, while minimizing adverse effects on Parkway resources. The project is needed because this bridge, which opened in 1964, has exceeded its 50-year design life. The bridge has not undergone a major rehabilitation since 1964, but repairs have kept it operational and safe. The bridge, which lacks redundancy in its design, exhibits widespread cracking in the bridge deck and notable deterioration of the bridge piers. To avoid the impacts of long-term or permanent bridge closure, the bridge needs to be replaced to provide a structurally sound vehicular bridge crossing the Tennessee River.

While the Tennessee Valley Authority (TVA) manages the river, the Parkway manages the Tennessee River Bridge and the land on both sides of the river. Detailed design and construction for the project will be conducted by the Federal Highway Administration Eastern Federal Lands Highway Division (FHWA), in consultation with the NPS. The US Coast Guard (USCG) oversees the use of this navigable waterway within the jurisdiction of the 8th District. The NPS is consulting with the TVA, USCG and US Army Corps of Engineers (USACE) and coordinating for the permitting of the bridge, bridge design, and environmental analysis. FHWA, USCG, USACE, and TVA are cooperating agencies in the NEPA process.

As part of the planning process, the EA evaluated three alternatives, including a no-action alternative and two action alternatives (Alternatives 1 and 2). Alternative 1 would replace the bridge on a skewed alignment partially south of the existing bridge. Alternative 2 would replace the bridge on a new alignment south of the existing bridge. The action alternatives present a reasonable and feasible approach that meets the purpose of and need for action. The Finding of No Significant Impact (FONSI) documents the decision of the NPS to implement the selected alternative, which is referred to as the preferred

¹The Department of Interior (DOI) published an interim final rule, NEPA Implementing Regulations, on July 3, 2025, and a final rule on February 24, 2026, rescinding and making necessary targeted updates to its remaining regulations implementing NEPA, as well as a DOI NEPA Handbook at 516 Departmental Manual 1. The park published an EA on November 20, 2024, relying upon preexisting NEPA procedures that predate July 3, 2025, because the plan’s NEPA review was sufficiently advanced at the time DOI issued the NEPA rule. Nonetheless, NPS will rely upon existing procedures to issue this FONSI, completing the NEPA review for the plan. The EA and FONSI are consistent with DOI’s Final NEPA Implementing Regulations and DOI NEPA Handbook.

²Certification related to Page Limits: The NPS certifies it has considered the factors mandated by NEPA; that this FONSI represents its good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits; that this prioritization reflects NPS’s expert judgement; and that any considerations addressed briefly or left unaddressed were, in NPS’s judgement, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed. Certification related to Deadline: The NPS certifies that this FONSI represents a good-faith effort to fulfill NEPA’s requirements within the congressional timeline; that such effort is substantially complete; that, in NPS’s expert opinion, it has thoroughly considered the factors mandated by NEPA; and that, in NPS’s judgment, the analysis contained therein is adequate to inform and reasonably explain its decision regarding the proposed Federal action.

alternative (Alternative 1) in the EA. The selected alternative includes replacing the bridge on a skewed alignment partially south of the existing bridge.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. Relevant sections of the EA are summarized and incorporated by reference below. The EA is available on the NPS Planning, Environment and Public Comment (PEPC) project site at [ParkPlanning - Environmental Assessment for John Coffee Memorial Bridge](#).

The NPS also requested public input on the EA during a 45-day EA public review period from November 20, 2024, to January 6, 2025. In total, the NPS received 15 independent pieces of correspondence, several with substantive comments.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, the NPS selected the preferred alternative (Alternative 1) after an evaluation of the feasibility of several potential alternatives. The alternatives considered but not carried forward for further analysis are summarized in Appendix C of the EA. Under the selected alternative, the NPS would replace the Tennessee River Bridge to improve the safety conditions for motorists, pedestrians, and cyclists in the project area.

The project components, construction/staging activities, roadway detours, and resource protection measures outlined in the EA (“Project Elements Common to Both Action Alternatives”) will occur under the selected alternative. As shown in Figure 1, a new, longer bridge will be constructed on a skewed alignment, with the western end of the bridge remaining on the existing alignment and the eastern end of the bridge partially skewed to the south. The bridge will be approximately 43-feet wide with a typical cross section containing approximately one 11-foot travel lane in each direction, 6-foot-wide shoulders on each side, and a 5-foot-wide walkway on the south side of the bridge. The new bridge under Alternative 1 will be approximately 5,000 feet long and will shift the bridge centerline on the eastern end. The new bridge will have approximately 24-28 spans and be constructed of pre-cast segmental concrete box and bulb tee girders with approximately 23-27 reinforced concrete piers. An approximately 30-foot-long extension to the existing drainage structure may be required in the drainage basin.

Under the selected alternative, site preparation will include establishing staging areas, clearing, grading, building embankments for approaches to the new bridge, installing cofferdams, excavating, and placing fill material (as needed) to install temporary construction access(es). The type of erosion and sediment control measures will depend on final bridge design. Prior to construction, the NPS will coordinate with the cooperating agencies to determine any necessary demolition methods. Construction and demolition are expected to occur from both terrestrial and temporary in-water construction access platforms, including mobile scaffolding or platforms. To the extent possible, material delivery and disposal will occur either in the water via the Tennessee River or via main arterial roadways in the region to avoid local roads and minimize traffic interruptions. Construction materials will be stored in approved staging areas. Removal via water will rely on a crane and barge to haul material away. Explosives will not be used during demolition and material removal.

Construction activities for the selected alternative are anticipated to occur over a period of approximately 5 years (or 1,360 working days), with a bridge closure and detour lasting approximately 2 years. The detour would be approximately 42 miles each way, or approximately 1-hour of additional driving travel time each way.

Rationale

The NPS selected Alternative 1 (preferred alternative) because it best meets the purpose and need while minimizing adverse impacts. Specifically:

- It satisfies the purpose and need by maintaining a safe and reliable bridge crossing over the Tennessee River.
- It will result in fewer adverse effects than Alternative 2 due to a shorter construction duration. In addition, the proposed alignment will reduce impacts on natural and cultural resources by requiring less new disturbance compared to Alternative 2.
- It incorporates resource protection measures and best management practices to avoid, minimize, and mitigate adverse environmental impacts.

Resource Protection Measures

Resource protection measures are discussed in Chapter 3 and Appendix B of the EA. These protection measures are considered part of the selected action and will be implemented to avoid, minimize, and/or mitigate impacts on Parkway resources. The measures presented in Appendix B of the EA are subject to the final design and approval of plans by relevant agencies.

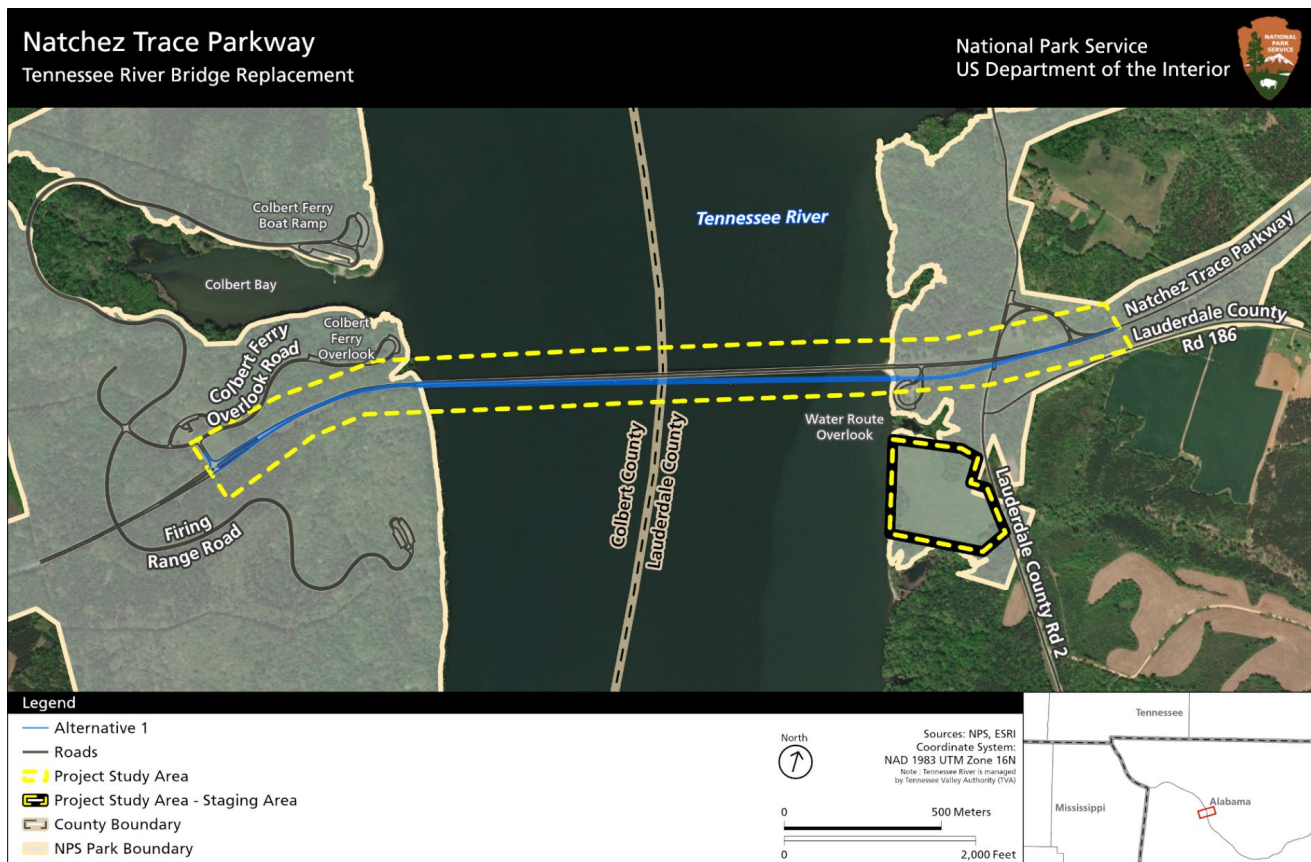


Figure 1: Replace bridge on a skewed alignment partially south of the existing bridge

OTHER ALTERNATIVES ANALYZED IN THE EA

In addition to the NPS selected alternative described above (Alternative 1), the EA analyzed a no action alternative and two action alternatives with variations on the proposed demolition and construction of the Tennessee River Bridge (see Chapter 2 of the EA). Alternative 2 was not selected because it would require a larger footprint, which would have greater impacts on Parkway natural and cultural resources, than Alternative 1. Alternatives considered but dismissed are summarized in Appendix C of the EA.

SIGNIFICANCE CRITERIA REVIEW

Potentially Affected Environment

As described in the EA, the selected alternative has the potential for adverse and beneficial impacts on Parkway resources. To evaluate the potential for significant impacts, agencies consider the setting, or potentially affected environment in which impacts may occur. In this case, the selected alternative may beneficially or adversely impact cultural resources, geological resources, natural soundscapes, visitor use and experience, water resources and water quality, and wildlife, including threatened and endangered species.

Degree of Effects of the Action

The NPS considered the following actual or potential project effects in evaluating the degree of effects for the selected alternative.

Beneficial and Adverse, and Short-term and Long-term Effects of the Selected Alternative

No significant impacts on resources were identified that will require analysis in an Environmental Impact Statement (EIS). Whether taken individually or as a whole, the impacts of the selected alternative do not reach the level of significance. The selected action will result in substantial long-term beneficial impacts. Resource protection measures as mentioned above (and described in detail in Chapter 3 and Appendix B of the EA) will further minimize any potential adverse impacts.

Effects of the Selected Alternative

The following summary of effects has been incorporated from Chapter 3, “Affected Environment and Environmental Consequences,” of the EA (pages 15-90).

Cultural Resources

The selected action will remove the existing bridge components and construct new bridge components within the riverbed, construct new bridge abutments on either side of the river, and realign the road prism on the eastern side of the river. The implementation of the selected action will constitute an adverse impact that will diminish the integrity of the Natchez Trace Parkway historic district and the John Coffee Memorial Bridge cultural landscape, as described in Chapter 3 of the EA (page 26-28). The selected action could result in a long-term, adverse impact on the George Colbert Archeological District, the Chikasha Aiasha Traditional Cultural Landscape (TCL), and the related ethnographic resources; however, the NPS and FHWA are developing design options that avoid impacts to these resources, and unavoidable impacts to cultural resources have been addressed through stipulations in a Programmatic Agreement (see Attachment C). Several stipulations include:

- Identification of roles and responsibilities, both administratively and professionally.
- Compliance with Section 106 of the National Historic Preservation Act (NHPA) regarding undertakings for the new bridge and the implication that Parkway may not use alternative procedures if an undertaking’s area of potential effects (APE) has not been inventoried for

historic properties or if there is potential to adversely affect a known historic property that is not part of the bridge replacement APE.

- Commitment to resolve adverse effects to historic properties, including implementing procedures for archeological monitoring, evaluating, and treating discoveries of unanticipated or newly identified cultural resources during construction.
- Monitoring, reporting, and treatment of contributing features of the historic district to ensure that the Secretary of the Interior's Standards for Rehabilitation, Standard 9, are met.
- Implementation of an Inadvertent Discovery Plan

The proposed alignment under the selected action seeks to avoid all terrestrial and submerged sites to avoid impacts on contributing resources associated with the George Colbert Archeological District. None of the five archeological sites are individually eligible for listing in the National Register of Historic Places (NRHP); however, four sites are contributing resources. If the alignment were altered during the final design phase and the plans directly affect the contributing resources of the district, the removal of the Tennessee River Bridge and replacement with a new bridge may constitute an adverse effect to the George Colbert Archeological District. The archeological district is considered a contributing resource to the Chikasha Aiasha TCL, and potential impacts to the sites within the archeological district will constitute a long-term, adverse impact on the NRHP-eligible property.

The removal and replacement of the Tennessee River Bridge under the selected action will constitute an adverse impact on the Parkway and John Coffee Memorial Bridge cultural landscapes. The removal of the bridge fabric and adjacent road prisms and realignment of the east side of the Parkway will diminish the integrity of design, setting, materials, workmanship, feeling, and association of the historic, designed cultural landscapes. The proposed realignment under the selected alternative will adversely impact other character-defining features, such as the Water Overlook and Parking Area.

While the Tennessee River Bridge does not contribute to the significance of the Tennessee River as an ethnographic resource, the construction of a new bridge could affect the existing viewshed by permanently altering portions of the landscape. Impacts will be minimized if the new bridge were designed to maintain the existing viewshed and surrounding landscape.

Although the undertaking results in adverse effects to historic properties under Section 106 of the NHPA, those effects are being resolved through a signed Programmatic Agreement developed in consultation with the SHPO, Tribal Nations, FHWA, TVA, USACE, and other consulting parties. The adverse effects are limited to specific identified cultural resources and do not result in the loss of the Parkway's overall historic character, integrity, or ability to fulfill its commemorative purpose. The NPS determined that the effects, while adverse, do not have the potential to result in significant effects on the human environment.

Geological Resources

Construction under the selected action will result in short-term, adverse impacts to soil from disturbance due to construction/demolition activities, excavation, and construction vehicle traffic. The total approximate area of disturbance is up to approximately 59 acres. However, because the new bridge will be built partially on the existing alignment before skewing to a new alignment, less undisturbed land will be required for the construction. Construction of bridge support piers and bridge abutments will not impact bedrock because the permitted tools do not generate vibratory or percussive waves strong enough to affect the rock matrix. Construction could result in permanent, adverse impacts to karst if bedrock is exposed by soil erosion and worn away by cycles of runoff and ponding. Overall, these impacts are minor to moderate, localized, and either temporary or limited in extent. Resource protection measures will prevent substantial erosion or degradation of karst features. Accordingly, the selected alternative has no potential for significant impact as the selected action will not create any perceptible changes in these resources, and their functioning will remain unchanged over the long term.

Natural Soundscapes

Construction under the selected action will result in short-term, adverse impacts on the soundscape. The demolition and replacement of the Tennessee River Bridge will generate several changes to the acoustic environment during its construction. The anticipated duration of construction is approximately five years, and the predicted construction noise impacts will exceed both the measured daytime median existing ambient sound level and the median natural ambient sound level. The major noise-generating activities include demolition of the existing bridge, and construction of the bridge foundations and superstructure.

Construction noise will result in temporary adverse impacts on wildlife and may temporarily alter wildlife behavior in the project vicinity. During construction, startle responses in wildlife could be induced, and animals could be displaced from the area in both the short term and long term because 40 dBA is the sound level threshold for noise-induced responses to terrestrial wildlife. It is difficult to predict potential impacts on freshwater mussels based on the limited available research; however, noise could disrupt filter feeding during construction activities. Under the selected action, bats will be intermittently exposed to noise and visual disturbances greater than baseline conditions during demolition and construction (including delivery and disposal of materials), which can temporarily or permanently alter bat behavior. Bats will also be exposed to noise as a result of ongoing operation of the bridge and during periodic maintenance and repair activities, including corridor clearing (mowing), road and bridge maintenance, and hazard tree removal. In the context of the temporary nature of increased noise and visual disturbances and the likelihood of most federally listed and state-protected or ranked species being absent from the project area (especially during construction), negative impacts to bats associated with these stressors will be temporary, lasting only as long as the duration of construction.

Impacts on visitor experience from construction noise will result in short-term, adverse impacts to the natural soundscape. The predicted range for construction noise will result in noise impacts well above the measured overall sound level and the median natural ambient sound level in the project corridor. The effects of these impacts may include speech interference in the vicinity of the construction equipment and audible construction noise at a considerable distance. Impacts on visitor experience from future traffic noise will likely be imperceptible. Although construction noise will be elevated above existing conditions, these effects are temporary and confined to the construction period. Wildlife responses are expected to be short-term and reversible, and long-term operational noise will be consistent with existing conditions. These impacts do not rise to a level of intensity or duration that would constitute a significant impact.

Visitor Use and Experience

Construction under the selected action will result in short-term, adverse impacts from visual and auditory disruptions, bridge closures, traffic delays, and connectivity loss. During construction, short-term, adverse impacts on visitor use will result from visible staging areas, noise disruptions, and increased emissions. Staging equipment and materials will be visible during construction, detracting from the natural scenery. The new bridge and roadway alignment will require tree removal and cut-and-fill of the slopes along the Tennessee River, resulting in short-term, adverse impacts on visitor use and experience by detracting from the visual quality and character in the project area during and after construction. Implementation of the selected action will result in short-term, adverse impacts to visitor use and experience because the bridge would be closed to visitors and drivers during construction, resulting in the loss of direct access to the Parkway and traffic delays from the detour. The delay will lengthen local commute times and emergency vehicle response times, and detours may increase congestion on nearby roads. The new bridge will have long-term, beneficial impacts by improving visitor safety and access to recreational, natural, and cultural resources. While the temporary bridge closure and detour will result in inconvenience, these effects are temporary and do not permanently restrict access to the Parkway or regional destinations. Long-term improvements to safety and reliability will enhance visitor experience. These impacts do not constitute a significant effect on visitor use and experience.

Water Resources and Water Quality

Under the selected action, replacing the Tennessee River Bridge will result in short-term, adverse impacts to water quality from construction and staging activities. There will be approximately 101 feet of clearing and excavation, and up to approximately 17 acres of land disturbance. Vegetation clearing, grading, and establishing the staging area southeast of the bridge will increase runoff of disturbed soil into the river. Construction vehicles will loosen soil and introduce sediment into the river. Construction activities in the river (installation of temporary staging platforms with piles to support loads and the construction of the approximately 23-27 piers for the new bridge) will disturb the river bottom and cause sedimentation and turbidity impacts, resulting in short-term, adverse impacts to water quality. Operation, maintenance, and repair activities will continue after the construction of the new bridge and will have impacts similar to preconstruction existing conditions. Water quality is expected to return to preconstruction quality once the project is complete, and areas temporarily disturbed during construction will be restored as close as possible to natural conditions. The presence of approximately 23-27 piers for the new bridge and 37 piers from the old bridge will have no impacts on water quality.

The selected action will have long-term, adverse impacts to water resources from removal of floodplains from where the new bridge will be built on a partial new alignment. Under the selected action, impacts to floodplain will occur during all construction phases. Vegetation clearing and grading will occur during the establishment of the staging area, which will disturb up to approximately 24 acres of floodplain. Construction vehicles, use of cofferdams, installation of temporary platforms, and construction of embankments for the approaches to the new bridge will also disturb floodplains. The construction of the approximately 23-27 piers in the river for the new bridge will permanently remove approximately 40,500 to 67,500 square feet of floodplain, resulting in long-term, adverse impacts to floodplains. The use of barges and other in-water work that would not disturb the river bottom will have no impact on floodplains. Operation, maintenance, and repair activities will continue after the construction of the new bridge and will have impacts similar to preconstruction existing conditions. The selected action will have long-term, beneficial impacts to water resources from reclaimed floodplains where the old bridge will be removed. With implementation of erosion control measures and restoration activities, water quality is expected to return to baseline conditions following construction. Permanent impacts to floodplains are limited in extent and partially offset by reclamation associated with removal of the existing bridge. These impacts do not represent a significant degradation of water resources.

Wildlife, including Threatened and Endangered Species

Bats. The selected action will require permanent removal of upland, mostly forested habitat, to accommodate the new roadway alignment and bridge approaches (approximately 6 acres). Potential impacts could include temporary or permanent loss or degradation of foraging and/or roosting habitat and travel corridors. Tree removal could also result in injury or death to individual bats; although, tree removal will be timed to avoid the active season for bats. Although unlikely, the potential for nighttime work and use of lighting could affect bats. Heavy equipment, vehicles, and/or surveying equipment can emit ultrasonic noise that disrupts bat behaviors and could threaten their presence within the area. Most federally listed and state-protected or ranked bat species are not likely to occur in the project area based on a lack of suitable high-quality habitat, limited population size and range, and lack of documented occurrences historically or in recent years.

Mussels. The selected action will result in temporary and permanent, negative impacts to freshwater mussels from habitat loss and disturbance; however, impacts to federally listed mussels are not anticipated because federally listed mussels are not expected to occur in the project area. Under the selected action, in-water work associated with removal of the existing bridge and replacement with a new bridge will result in permanent and temporary impacts to benthic habitats in the Tennessee River. Removal of the existing bridge abutment and piers will temporarily affect approximately 0.1 acres of benthic habitat and an additional 0.7 acres to accommodate a temporary work platform. Placement of the

bridge abutment and piers will result in up to approximately 2 acres of permanent loss of suitable habitat for freshwater mussels. Removal of the existing bridge and replacement with a new bridge will result in temporary increases in turbidity and sedimentation; although, given that federally listed freshwater mussels are not likely to be present in the project area, impacts on federally listed mussels are unlikely to occur.

Monarch Butterfly. The action alternatives would not affect monarch butterfly because the project area does not provide suitable habitat (i.e., meadows) for the species.

General Wildlife. The selected action will result in minor, temporary, negative impacts on wildlife as a result of habitat loss/disturbance, noise, and visual disturbances. Negative impacts on wildlife will include temporary displacement and or disturbance to the species close to the implemented project activities; however, both terrestrial and aquatic species will likely avoid the area during project implementation. Construction activities will likely result in mortality of small animals, burrowing invertebrates, and benthic organisms. Tree removal will impact birds and bats similarly because it will result in the loss of nesting habitat and travel corridors. After construction, the lease for staging areas will end, and the area will be allowed to naturally revegetate. Although unlikely, the potential for nighttime work and use of lighting poses an additional threat to wildlife. Artificial light at night can be detrimental for both plant and animal species, especially in a historically dark area because it disrupts predator/prey relationships. Artificial glare impacts wetland animals disrupting reproduction cycles for amphibians, and migratory birds that navigate by moonlight go off course and into areas where collisions could lead to increased mortality.

Degree to Which the Selected Alternative Affects Public Health and Safety

Under the selected action, public health and safety will be improved by addressing the current structural deficiencies of the bridge. Upon completion, visitors will continue to enjoy the same level of access, recreational activities, and ability to experience the Parkway's natural and cultural qualities. There will be no significant impacts on public health, public safety, or unique characteristics of the region.

Socioeconomics and Economic Effects

Implementation of the selected alternative would result in short-term, localized economic effects associated primarily with the temporary closure of the Tennessee River Bridge and the required detour during construction. As described in the EA, approximately 1,400 vehicles use the bridge daily, including local commuters and individuals accessing goods, services, and employment in communities on either side of the river. During the anticipated closure period (approximately two years), travelers would be required to use an approximately 42-mile detour (approximately one hour each way), which could increase travel time, vehicle operating costs, and inconvenience for local residents and businesses.

Public comments (Attachment A) identified concerns related to increased fuel costs, vehicle wear and tear, access to employment and services, and potential delays in emergency response. These effects represent temporary increases in the cost of travel and reduced efficiency in local transportation connectivity, which could indirectly affect local economic activity, particularly for individuals and small businesses that rely on routine cross-river travel.

However, these impacts are limited in duration and geographic extent and will not result in measurable changes to regional employment, income, or overall economic output. The affected area is relatively small, and alternative transportation routes remain available throughout the construction period. The NPS will coordinate with local governments and service providers to minimize disruption and allow communities to adapt to temporary changes in travel patterns.

Construction of the project will also result in short-term beneficial economic effects, including employment opportunities and spending associated with construction activities, materials, and services.

While these benefits are temporary, they would contribute to the local and regional economy during the construction period.

In the long term, the selected alternative would provide beneficial economic effects by ensuring continued safe and reliable access across the Tennessee River. Replacement of the aging bridge would reduce the risk of unplanned closures or load restrictions that could result in more severe and prolonged disruptions to transportation, commerce, and emergency services. Improved infrastructure reliability supports continued economic activity, tourism, and access to recreational opportunities along the Natchez Trace Parkway.

Based on the analysis in the EA and consideration of public comments, the economic effects of the selected alternative are temporary, localized, and not substantial when compared to existing baseline conditions. This action would not result in meaningful changes to employment, income, property values, or overall economic conditions at the local or regional scale.

Therefore, the selected alternative does not have the potential to result in significant socioeconomic or economic impacts.

Effects on the Quality of Life of the American People

The NPS considered whether the selected alternative has the potential to significantly affect the lives of the American people, including access to transportation, community connectivity, public services, and economic and social conditions.

As identified in the EA and reflected in public comments (Attachment A), the primary concern related to quality of life is the temporary bridge closure and associated detour, which would increase travel time by approximately 42 miles (approximately one hour each way) for a period of up to two years. Commenters noted potential effects on daily commuting, access to goods and services, emergency response times, and costs associated with additional travel.

As described in the EA and responses to comments, these effects will be temporary and localized. The NPS will coordinate with local governments and emergency service providers to ensure continuity of emergency response and public services during the closure period. Advance communication and coordination will allow affected communities to plan for and adapt to temporary changes in travel patterns.

The selected alternative was chosen, in part, because it minimizes the duration and extent of disruption compared to other alternatives, while avoiding greater long-term environmental impacts.

Importantly, the action will result in long-term benefits to the public, including improved safety, reliability, and continued access across the Tennessee River. Without the project, the existing bridge would continue to deteriorate and could require unplanned or extended closure in the future, resulting in greater disruption to surrounding communities.

The analysis in the EA and consideration of public comments demonstrate that:

- The action does not result in disproportionate or highly adverse effects to communities;
- Impacts to access, travel time, and services are temporary and do not result in lasting changes to community function;
- Public health and safety will be improved in the long term; and
- The action does not adversely affect the public's ability to use, enjoy, or benefit from park resources in a meaningful or lasting way.

Therefore, the selected alternative does not have the potential to significantly affect the quality of life of the American people.

In considering the duration, geographic extent, degree, and context of impacts, the NPS determined that the selected alternative does not have the potential to cause substantial effects on the human environment. Effects are localized to the bridge corridor, are largely temporary during construction, are reduced through incorporated design features, mitigation measures, and resource protection measures, and are outweighed by long-term benefits associated with replacement of the aging bridge. Accordingly, the NPS determined that preparation of an Environmental Impact Statement is not required.

AGENCY AND TRIBAL CONSULTATION

The NPS initiated consultation with relevant agencies, including the US Fish and Wildlife Service (USFWS), the Alabama State Historic Preservation Office (SHPO), and Tribal Nations, during the preparation of the EA and provided a copy of the EA for review. This consultation is discussed in detail in Chapter 4 of the EA titled “Agency Consultation.”

USFWS

In accordance with Section 7 of the ESA, the NPS prepared a Biological Evaluation for USFWS on August 18, 2023. Based on the biological analysis of potential impacts from replacing the Tennessee River Bridge, the NPS requested concurrence from USFWS that all potential effects from the proposed action to federally listed, proposed, and candidate species would be insignificant or discountable and the proposed action may affect but is not likely to adversely affect the gray bat, Indiana bat, little brown bat, northern long-eared bat, or tricolored bat. There is no designated critical habitat within the project area; therefore, the proposed action will have no effect on critical habitat for any listed species. Further, the proposed action will have no effect on dromedary pearly mussel because this species is extirpated from the project area and is not likely to adversely affect pink mucket or rough pigtoe based on the likely absence of these species from the project area and the limited amount of benthic disturbance. In February 2026, the USFWS concurred with a Not Likely to Adversely Affect determination, as long as tree removals were limited to occur between November 15th and March 31st. Since the original bat surveys are valid till August 2027, the NPS and FWS anticipates the completion of an updated survey and a reinitiation of consultation closer to construction. A bridge survey for bats would also need to be redone within 2 years of demolition of the old bridge.

Alabama SHPO

Compliance with Section 106 of the NHPA was carried out separately but concurrently with the planning process for the EA. As required by Section 106 of the NHPA, the NPS is consulting with the SHPO as a consulting party. In March 2022, the NPS sent a letter to the SHPO requesting consultation, which was accepted. In March 2023, the NPS transmitted the Determination of Eligibility Form for review, in which the SHPO agreed with the determination, concurred that demolition of the bridge will result in an adverse effect, and noted that the new alignment may have an adverse effect on the cultural landscape. On July 2, 2024, SHPO concurred with the results and recommendations of the Assessment of Effect documentation. On June 16, 2023, a draft ethnographic report was provided to the SHPO for review and comment. The SHPO responded with comments within 30 days of receiving the report, and these comments were fully addressed in the revised and final ethnographic reports. In June and September 2024, the first and second internal EA was provided to the SHPO. No comments were received within either 30-day review period.

The NPS also notified the Advisory Council on Historic Preservation (ACHP) of the proposed adverse effects to historic properties on September 16, 2025. On September 26, 2025, the ACHP declined to participate further in consultation.

The NPS completed the Section 106 consultation process, concluding with a signed Programmatic Agreement in June 2026.

Tribal Nations

The NPS completed the Section 106 consultation process prior to finalizing this decision document for the EA, including consultation with traditionally associated Native American tribes.

On December 9, 2024, the NPS requested review and comment on the draft Traditional Cultural Property nomination form from the Chickasaw Nation. On January 23 and February 4, 2025, the Chickasaw Nation responded with comments on the draft nomination form. The final Traditional Cultural Property nomination will be completed prior to ground disturbance per the Section 106 programmatic agreement.

On January 29, 2025, the NPS requested review and comment on the draft Programmatic Agreement from the tribes so the NPS could incorporate feedback before the agreement was finalized. No comments were received from the Muscogee (Creek) Nation, Poarch Band of Creek Indians, Cherokee Nation, and Shawnee within the 30-day review period.

On February 5, 2025, the Chickasaw Nation requested to be an invited signatory on the Programmatic Agreement. On February 10, 2025, the Chickasaw Nation responded with comments within 30 days of receiving the draft agreement. On March 13, 2025, the NPS held a meeting with the Chickasaw Nation to discuss the comments provided on the draft agreement. The final Traditional Cultural Property nomination will be completed prior to ground disturbance per the Section 106 programmatic agreement.

Furthermore, if the tribes provide additional information on ethnographic resources or traditional uses, the NPS will work with concerned parties to resolve any potential impacts associated with the project.

Cooperating Agencies

The NPS consulted with FHWA, USACE, and TVA as cooperating agencies for this project. The FHWA developed the conceptual design for the project, and the agency is continuing to work with the NPS to revise the designs to limit the potential impacts on natural and cultural resources.

On December 9, 2024, the NPS sent the draft Traditional Cultural Property nomination form to the TVA for review and comment on the draft nomination form. On January 27, 2025, the TVA responded with comments on the draft nomination form. The final Traditional Cultural Property nomination will be completed prior to ground disturbance per the Section 106 programmatic agreement.

On January 29, 2025, the NPS requested review and comment on the draft Programmatic Agreement from the FHWA, TVA, USCG, and the USACE so the NPS could incorporate feedback before the agreement was finalized.

On March 3, 2025, the FHWA responded with minimal comments on the draft agreement.

Between February 24 and March 4, 2025, the TVA responded with minimal comments on the draft agreement.

On March 4, 2025, the USCG responded and requested to be removed as an inviting signatory to the draft agreement. The NPS removed reference to the USCG in the Programmatic Agreement.

On March 6, 2025, the USACE responded with comments on the draft agreement. On, the NPS held a meeting with the USACE to discuss the comments provided on the draft agreement. The final Traditional Cultural Property nomination will be completed prior to ground disturbance per the Section 106 programmatic agreement.

PUBLIC INVOLVEMENT

Public engagement, prior to the release of the EA for public comment is described in Chapter 4 (page 91). On November 20, 2024, the NPS issued a news release notifying interested individuals and organizations of the release of the EA. The news release included a link to the NPS Planning, Environment, and Public Comment (PEPC) website, which initiated a 45-day public comment period. The NPS posted the EA to

the PEPC website at the start of the public comment period. Comments were accepted from November 20, 2024, until January 6, 2025.

The newsletter also provided a brief introduction and overview of the EA, as well as information on how to participate in the public meeting, and how to provide comments during the public review period. An in-person public meeting was held from 5:00 to 6:30 p.m. on December 3, 2024, in Cherokee, Alabama at the Cherokee Senior Center. An estimated total of 8 people attended the meeting. The NPS received 15 correspondences during the public comment period. No comments were received during the 30-day review period of the EA in relation to the Programmatic Agreement. The Public Comment Response Report is provided in Attachment A.

FINDING OF NO SIGNIFICANT IMPACT

In considering whether the effects of the proposed action are significant, the NPS analyzed the potentially affected environment and degree of the effects of the action. The NPS considered both short- and long-term effects and both beneficial and adverse effects.

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). Therefore, an EIS will not be required. The selected alternative will not have a significant effect on the human environment in accordance with section 102(2)(c) of NEPA.

Based on the analysis presented in the EA, the incorporation of resource protection measures, and consideration of public and agency input, the NPS has further determined that the effects identified in the EA are not substantial in context or degree and therefore do not warrant preparation of an Environmental Impact Statement.. This determination reflects consideration of the context and intensity of impacts, including the duration, geographic scope, degree of effect, potential for uncertainty, and relevance to public health, safety, and the lives of the American people, consistent with Department of the Interior NEPA Regulations. Accordingly, preparation of an Environmental Impact Statement is not required.

ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT

INTRODUCTION

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), has prepared an environmental assessment (EA) for the John Coffee Memorial Bridge Replacement (Tennessee River Bridge) project in accordance with the National Environmental Policy Act (NEPA). The project is located along the Natchez Trace Parkway (Parkway), which spans across the Tennessee River, approximately six miles north of Cherokee, Alabama.

The NPS released a project newsletter on October 21, 2022, to start a civic engagement period, providing the public with background on the proposed project, the purpose and need for the project, potential preliminary options, the planning process, and how to comment on the newsletter. The document was published on the NPS Planning, Environment, and Public Comment (PEPC) website at: <https://parkplanning.nps.gov/JohnCoffeeMemorialBridge>. The civic engagement period was open for 30 days from October 21, 2022, to November 28, 2022. Additionally, the NPS held one virtual public meeting and two in-person meetings. The virtual public meeting was held over Zoom on October 25, 2022, from 5:00 p.m. to 6:30 p.m., with six people in attendance. In-person public meetings were held from 5:00 to 6:30 p.m. on November 2, 2022, in Cherokee, Alabama at the Cherokee Senior Center and on November 3, 2022, in Florence, Alabama at the Florence Lauderdale Public Library. An estimated total of 35 people attended both in-person meetings. 85 pieces of correspondence were received during the public comment period.

In April 2024, the NPS issued a newsletter notifying interested individuals and organizations of project updates that had occurred since the civic engagement period in October-November 2022. The newsletter included information on the two action alternatives carried forward for detailed analysis and the no-action alternative. The newsletter also provided updates on the findings from the resource studies conducted to better understand the extent of potential impacts to those resources.

On November 20, 2024, the NPS issued a news release notifying interested individuals and organizations of the release of the EA. The news release included a link to the project website, which initiated a 45-day public comment period that ended on January 6, 2025. The newsletter also provided a brief introduction and overview of the EA, as well as information on how to participate in the public meeting, and how to provide comments during the public review period. An in-person public meeting was held from 5:00 to 6:30 p.m. on December 3, 2024, in Cherokee, Alabama at the Cherokee Senior Center. An estimated total of 8 people attended the meeting. 15 pieces of correspondence were received during the public comment period.

DEFINITION OF TERMS

Correspondence: A correspondence is the entire document received from a commenter and includes letters; written comment forms; comments entered directly into the PEPC database; and any other written comments provided either at the public meetings, by postal mail, or in person at the park.

Comment: A comment is a portion of text within a correspondence that addresses a single subject such as visual resources or mitigation measures. The comment could also question the accuracy of the information provided in the newsletter, question the adequacy of any background information, or present reasonable alternatives other than the potential actions presented in the newsletter.

Code: A code is a grouping centered on a common subject, such as “AL1000 No Action.” The codes were developed during the public engagement process and are used to track major subjects found in the

newsletter. In cases where no comments are received on an issue, the code is not identified or discussed in this report.

Concern Statements: Concern statements summarize the issues identified by each code. Each code was characterized by concern statements to provide a better focus on the content of the comments.

Substantive: A substantive comment is a comment that raises a specific issue or concern about a project or study process. Substantive comments question the accuracy of information, the adequacy of the environmental analysis, or raises concerns about new impacts, or provides new information.

COMMENT ANALYSIS METHODOLOGY

Comment analysis is a process used to compile and correlate similar comments into a usable format for decision makers and the interdisciplinary project team. Comment analysis assists NPS in organizing, clarifying, and addressing information pursuant to NEPA. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

Correspondence was received via US mail or correspondence entered directly into the PEPC system. Letters received through the US mail were entered into the PEPC system for analysis.

The NPS PEPC database was used to manage the correspondence. Once all correspondence was entered into PEPC, each was read, and specific comments within each unique correspondence were identified. When identifying comments, every attempt was made to capture the full breadth of comments submitted.

The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. The database tallies the total number of correspondences and comments received, can sort and report comments by a particular topic or issue, and provides demographic information on the sources of each comment. Analysis of the public comments involved assigning codes to statements made in comment forms submitted via the PEPC database. All comments were read and analyzed, including those of a technical nature, opinions, suggestions, and comments of a personal or philosophical nature.

A coding structure was developed to help sort comments into logical groups by topic and issue. NPS derived the coding structure from an analysis of the range of topics discussed during the public engagement process, past planning documents, and the comments themselves. The coding structure was designed to capture the content of the comments rather than to restrict or exclude any ideas.

Under each code, all comments were grouped by similar themes, and those groups were summarized with a concern statement. Once every correspondence was broken into comments, all substantive comments were categorized into concern statements or summarized with similar comments. Although the analysis process attempts to capture the full range of public concerns, this report should be used with caution. *Comments from people who chose to respond do not necessarily represent the sentiments of the entire public.*

SUMMARY OF CONCERN STATEMENTS AND COMMENT RESPONSES

The following table was produced by the PEPC database and provides information about the numbers and types of comments received, organized by code. The table below is a summary of the number of comments received under each code.

A summary of substantive comments in concern statements and the NPS responses to comments that were received during the EA public review period are provided below. The majority of the comments received were related to the bridge closure and proposed detour duration, impacts related to visitor use and experience, and impacts related to local communities.

Table 1. Number of Comments Per Code

Code	Description	Comments
AL2000	Alternative 1 – Skewed Alignment	1
IT4000	Impact Topics: Visitor Use and Experience	2
IT11000	Impact Topics: Local Community	2
IT12000	Impact Topics: Bridge Closure Duration	3
IT13000	Other/New Impact Topics	1
TOTAL		9

AL2000 - Alternative 1: Skewed Alignment

CONCERN STATEMENT: Further clarification was requested on the proposed area of disturbance under Alternative 1 and Alternative 2. Under Alternative 1, approximately 59 acres would be disturbed using 50% of the current project area. Alternative 2 would disturb approximately 60 acres using 10% of the current project area.

NPS RESPONSE: The final design for this project is not complete and is therefore subject to change during subsequent design phases. Table 2 on page 16 of the EA represents a “worst case scenario” for the proposed area of disturbance. As presented in the EA, both alternatives would have approximately the same area of total disturbance during construction, however, there are distinct differences. For Alternative 1, up to 50% of the area of disturbance (approximately 29.5 acres) was previously impacted during the construction process of the existing bridge in the 1960's. Whereas, for Alternative 2, approximately 10% of the area of disturbance (approximately 6 acres) was previously impacted during construction of the existing bridge. Therefore, the larger area of proposed disturbance would occur under Alternative 2 because approximately 90% of the proposed disturbance (approximately 54 acres) would occur in previously undisturbed areas, require more forest clearing, earthmoving and excavation, and would have a greater potential to impact natural and cultural resources in the area. In summary, Alternative 1 has a smaller percentage of new disturbance to park resources because it utilizes a majority of the current footprint of the Parkway.

IT4000 Impact Topics: Visitor Use and Experience

Visitor Use Considerations

CONCERN STATEMENT: The bridge closure and proposed detour could have an impact on visitor use and experience. It was noted that people utilize the bridge every day to access nearby goods and services, as well as for commuting for work, appointments, and grocery shopping.

NPS RESPONSE: As discussed in the EA, the Parkway was established to commemorate the Old Natchez Trace and provide visitors with high-quality recreational activities such as hiking, camping, fishing, and experiencing natural and cultural resources. The NPS understands that it has also become a transportation route for local communities. As noted in the EA, approximately 1,400 vehicles travel along the bridge daily. During the bridge closure, communities and local commuters will need to use an approximately 42-mile detour route (approximately 1 hour drive) to reach community resources, businesses, employment destinations, emergency services, or other services in adjacent communities on either side of the Tennessee River. While the removal of the bridge will result in short-term, adverse impacts to visitors and local commuters, the preferred alternative will provide both user groups a safe route across the Tennessee River with the least environmental impacts in the long-term. The NPS will maintain communication with the public prior to any future bridge closures to ensure the public has sufficient time to adjust their travel plans.

Emergency Service Considerations

CONCERN STATEMENT: The bridge closure and detour route would impact emergency services, including fire and rescue personnel. It was noted that access to the bridge is crucial for emergency services to provide timely response in the area.

NPS RESPONSE: The NPS will maintain open and early communication with local and regional emergency service providers throughout the final design phase. This will ensure local and regional providers have sufficient time to develop and communicate plans for providing emergency response during the bridge closure. As discussed in the EA, communities and local commuters will need to use an approximately 42-mile detour route (approximately 1 hour drive) to reach community resources, businesses, employment destinations, emergency services, or other services in adjacent communities on either side of the Tennessee River.

IT11000 - Impact Topics: Local Community

Community Considerations

CONCERN STATEMENT: The proposed detour would create additional burdens, such as additional costs from using more gas, and wear-and-tear on their vehicles. Additionally, the bridge closure and proposed detour would make travel difficult, especially for senior citizens. It was encouraged to keep the bridge open during construction or delay building the new bridge.

NPS RESPONSE: As discussed in the EA, the Parkway was established to commemorate the Old Natchez Trace and provide visitors with high-quality recreational activities such as hiking, camping, fishing, and experiencing natural and cultural resources. The NPS understands that it has also become a transportation route for local communities. As noted on page 11 of the EA, the preferred alternative would partially allow for the new bridge to be constructed and the current bridge to remain operational during bridge construction. However, in the areas where the new bridge would remain on the current alignment, the existing bridge would require a closure to tie the new bridge into the existing transportation network, resulting in a detour

of approximately two years; therefore, the bridge cannot remain open for the entire duration of construction. During the proposed bridge closure, communities will need to use an approximately 42-mile detour route (approximately 1 hour drive) to reach community resources, businesses, employment destinations, emergency services, or other services in adjacent communities on either side of the Tennessee River.

As noted in Chapter 1 of the EA, the bridge lacks redundancy in its design, making it a Non-Redundant Steel Tension Member Bridge, formerly known as a fracture critical bridge. Although the existing condition of the bridge may not be readily visible to the public, qualified bridge inspectors have carefully examined the bridge (approximately every two years), and noted issues related to the condition of the concrete, pack rust between the beam plates, and with the column foundations. While the bridge is safe to drive on today, the bridge inspectors have noted an increased rate of deterioration that needs to be addressed. In approximately 10 to 20 years, the bridge will eventually reach a state where it no longer meets safety requirements, and the NPS and FHWA will be required to close the bridge to vehicular traffic. The NPS is beginning planning now for the proposed bridge replacement to avoid long-term bridge closures in the future while the design process is being completed, and funding is secured.

IT120000 - Impact Topics: Bridge Closure Duration

Bridge Closure Concerns

CONCERN STATEMENT: Closing the bridge during construction was discouraged. Clarification was requested on why the bridge needs to be closed before a new bridge is built. Rather, a suggestion was made to keep the existing bridge open, while the new bridge lanes are being built. It was also noted that keeping the bridge open during construction would be more economical for the community and those that utilize the bridge.

Specific questions related to the bridge closure under Alternative 2 included:

1. Would traffic still be able to cross the current bridge until construction of the new bridge is completed?
2. How much time would it remain open if this is a possibility?

NPS RESPONSE: The NPS and FHWA developed several preliminary alternatives early in the planning process, however, these preliminary alternatives were not carried forward for further analysis because they were not technically or economically feasible, did not resolve the purpose and need for taking action, or would result in more environmental harm. For additional information on the preliminary alternatives that were considered but dismissed, please see Appendix C of the EA.

The final design for this project is not complete and is therefore subject to change during subsequent design phases. However, the EA presents a conservative estimate for the proposed duration of bridge closure time in Chapter 2. Under both alternatives, there would be a required period of closure to traffic to allow adequate time to connect the proposed bridge to the approach roadway profile.

Under Alternative 1, construction activities are anticipated to occur over a period of approximately five years. This alternative would partially allow for the new bridge to be constructed and the current bridge to remain operational during bridge construction. However, in the areas where the new bridge would remain on the current alignment, the existing bridge would require a closure to tie the new bridge into the existing transportation network, resulting in a detour of approximately two years.

Under Alternative 2, construction activities are expected to occur over a period of approximately six years, allowing the new bridge to be constructed and the current bridge to remain operational during most of the construction period. However, the bridge would be closed to tie the new bridge into the existing

transportation network, resulting in a detour duration of approximately six months. The NPS recognizes the importance of keeping the existing bridge open to traffic as much as possible during construction, and will work to minimize the bridge closure time, to the extent possible, during the final design process.

Bridge Name Change

CONCERN STATEMENT: Renaming the bridge to reflect and honor the Indigenous peoples of the area was suggested. It was noted that the bridge name should not memorialize a person associated with slavery, nor someone who removed Indigenous peoples from their lands.

NPS RESPONSE: The renaming of the bridge is out of scope for this project and is not being considered under the proposed action. However, the NPS has a detailed process for naming a park structure, which is outlined in *NPS Management Policies 2006, Section 9.6, Commemorative Works and Plaques*. Prior to naming (or renaming) a park structure or commemorative work, the proposed action would need to be considered under a separate compliance and consultation process for the National Environmental Policy Act and Section 106 of the National Historic Preservation Act of 1966. Additionally, the action would need to be authorized by Congress or approved by the NPS Director before a decision could be made to approve a commemorative work. The NPS will take this suggestion under advisement for consideration during future compliance and consultation efforts.

ATTACHMENT B: DETERMINATION OF NON-IMPAIRMENT

NON-IMPAIRMENT DETERMINATION

This non-impairment determination has been prepared for the selected action, as described in the FONSI for the *Natchez Trace Parkway Replacement of the John Coffee Memorial Bridge (Tennessee River Bridge)* EA.

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the NPS to manage units “to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 United States Code 100101).

NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the “particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the reasonably foreseeable impacts in question and other impacts.”

An impact on any park resources or values may constitute an impairment, but an impact is more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

The significance and importance of each resource analyzed have been informed by the Natchez Trace Parkway’s enabling legislation and its foundation document (NPS 2014) as discussed in the following sections. As a basis for evaluating the potential for impairment or unacceptable impacts on the park’s resources, the NPS relied on the *Natchez Trace Parkway Replacement of the John Coffee Memorial Bridge (Tennessee River Bridge)* EA. Chapter 3 (“Affected Environment and Environmental Consequences”) of the EA analyzes direct, indirect, and reasonable foreseeable impacts on cultural resources, environmental justice, geological resources, natural soundscapes, visitor use and experience, water resources and water quality, and wildlife, including threatened and endangered species.

The purpose of the Natchez Trace Parkway, along with park significance statements and a description of the park’s fundamental resources and values (FRVs), are described in the *Foundation Document for Natchez Trace Parkway*, 2014. The park’s purpose is:

“...commemorate 10,000 years of travel along the Old Natchez Trace corridor and provide a 444-mile journey linking culture, nature, and history along one of the oldest transportation routes on the North American continent.” (NPS 2014).

A non-impairment determination is not necessary for visitor use and experience because these impact topics are not generally considered a park resource or value subject to the non-impairment standard (see NPS 2006, section 1.4.6). Impacts on other resources that would be subject to a non-impairment determination, including air quality, vegetation, wetlands, and visual resources – are so minor that they were not carried forward for analysis in the EA and will not result in impairment (see Appendix A of the EA for the rationale of dismissal for each environmental issue). The impacts to these resources are small and insignificant, and these resources will remain available for the enjoyment of current and future generations. Therefore, the resources will not be impaired by implementation of the selected action. While a written determination is not required for a determination of unacceptable impacts, NPS *Management Policies* 2006, section 1.4.7.1 was considered, and the selected action will not result in unacceptable impacts to park resources.

NON-IMPAIRMENT EVALUATION BY RESOURCE

Cultural Resources

Implementation of the selected action could have long-term, adverse impacts to historic, archeological, and ethnographic resources; however, the NPS is currently working with FHWA to develop design details that will avoid or minimize impacts to the known cultural resources in the project area. Impacts will be mitigated by adhering to the resource protection measures listed in Appendix B of the EA. Additionally, as part of NHPA Section 106 consultation for the proposed project, the NPS has developed a Programmatic Agreement (see Attachment C) with the SHPO, tribes, FHWA, TVA, and USACE to formalize minimization or avoidance of adverse impacts to cultural resources in the project area, which will avoid, minimize, and mitigate adverse impacts to the extent practicable and will ensure that impacts do not rise to the level of impairment. Therefore, implementation of the selected action will not result in impairment of cultural resources on NPS lands.

“American Indian History and Culture,” “Early American History and Culture,” and “the Old Natchez Trace” are identified in the foundation document (NPS 2014) as FRVs. Allowing FRVs to deteriorate could jeopardize the purpose and significance of the park. The selected alternative is in alignment with the identified FRVs because the replacement will avoid a long-term or permanent bridge closure, while minimizing adverse effects on Parkway resources. Additionally, implementing the selected alternative contributes to the designed landscape and scenic integrity FRV, which aims to facilitate leisurely and scenic travel, while linking scenic, cultural, and natural features of interest.

Geological Resources

Bridge demolition and construction under the selected action will have short- and long-term, adverse impacts on soil and bedrock. No impacts to bedrock will occur from the construction/demolition of bridge support piers; however, removal of bedrock during cut-and-fill activities will have long-term, adverse impacts because it will be permanent. Potential permanent, adverse impacts to karst features could be the creation of new surface to subsurface connections driven by the exposure of bedrock surfaces through soil erosion and the dissolution of the exposed rock by surface runoff. Impacts will be mitigated to avoid increasing erosion beyond current levels by adhering to the resource protection measures listed in Appendix B of the EA. Impacts to soils, geology, and karst features will not create any perceptible changes in these resources, and their functioning will remain unchanged over the long term. Therefore, implementation of the selected action will not result in impairment of geological resources.

Wildlife, including Threatened and Endangered Species

“Diversity of Natural Resources,” identified as an FRV, emphasizes the preservation of ecoregions in the Parkway, including wildlife corridors (NPS 2014). During construction, bridge demolition and

construction will have temporary and permanent, negative impacts on individual wildlife related to habitat loss/disturbance, noise, and visual disturbances. However, resource protection measures, as outlined in Appendix B of the EA, support the diversity of natural resources by avoiding or minimizing negative impacts on wildlife. These measures will include preconstruction surveys to determine the presence or absence of sensitive and/or protected species, seasonal restrictions on tree clearing to avoid the active season for bats, and restoring the agricultural lease area to natural/riparian forest habitat upon completion of construction/staging activities. Negative impacts on wildlife will include temporary displacement and/or disturbance to the species close to the implemented project activities; however, both terrestrial and aquatic species will likely avoid the area during project implementation. Therefore, implementation of the selected action will not result in impairment of wildlife, including threatened and endangered species.

Natural Soundscapes

Under the selected action, construction will result in long-term, adverse impacts to wildlife and short-term, adverse impacts related to visitor use. Resource protection measures (see Appendix B of the EA), such as implementing standard noise abatement measures during construction, will avoid or minimize negative impacts to natural soundscapes related to construction. In the context of the temporary nature of increased noise and the likelihood of most federally listed and state-protected or ranked species being absent from the project area (especially during construction), negative impacts to resources associated with these stressors will be temporary, lasting only as long as the duration of construction. Therefore, implementation of the selected action will not result in impairment of natural soundscapes.

Water Resources and Quality

The protection of water resources is identified as an element of the FRV, “Diversity of Natural Resources,” in the foundation document (NPS 2014). The selected action will have short-term, adverse impacts to water quality during construction and long-term, adverse impacts to water resources from removal of floodplains. However, resource protection measures (see Appendix B of the EA) such as preparing an erosion control plan, will avoid or minimize negative impacts, which will support the Parkway FRV in protecting water resources. Therefore, implementation of the selected action will not result in impairment of water resources and quality.

Summary

The NPS has determined that the implementation of the selected action will not constitute impairment of the resources of the park. This conclusion is based on consideration of the park’s purpose, significance, fundamental resources and values, and a thorough analysis of the environmental impact described in the plan/EA; comments provided by the public and other stakeholders; and the professional judgement of the decision-maker guided by the direction in *NPS Management Policies 2006*.

REFERENCES

National Park Service (NPS)

- 2014 Foundation Document Overview. Natchez Trace Parkway, Mississippi, Alabama, Tennessee. US Department of the Interior, National Park Service.
https://www.nps.gov/natr/learn/management/upload/NATR_OV_2014_508-withheadings.pdf

ATTACHMENT C: PROGRAMMATIC AGREEMENT