

Natchez Trace Parkway
May 2022

U.S. Department of the Interior
National Park Service



Environmental Assessment for the Double Arch Bridge Safety Improvements Williamson County, TN



1 ENVIRONMENTAL ASSESSMENT
2 for the
3 NATCHEZ TRACE PARKWAY DOUBLE ARCH BRIDGE SAFETY IMPROVEMENTS
4
5

6 EXECUTIVE SUMMARY

7 The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA),
8 proposes to implement a suicide deterrent system for the Natchez Trace Parkway (Parkway) Double Arch
9 Bridge located at milepost 438 in Williamson County, TN. The purpose of the project is to reduce injuries
10 and fatalities while maintaining the bridge's structural integrity, conserving the bridge's engineering
11 significance, and preserving the public's scenic enjoyment of the Parkway. This Environmental
12 Assessment (EA) examines the potential environmental consequences of the no action alternative and
13 three action alternatives. The action alternatives analyzed in the EA include physical suicide deterrent
14 systems (PSDS) comprised of Vertical Posts with Angled Returns (Action Alternative 1, the proposed
15 action), Arched Posts (Action Alternative 2), and Vertical Posts with Longitudinal Rail (Action Alternative
16 3).
17

18 PUBLIC COMMENT

19 This EA will be on public review from May 16, 2022 until June 17, 2022. If you wish to comment on this
20 EA, you may submit comments electronically through the NPS' Planning, Environment and Public
21 Comment (PEPC) website at: <https://parkplanning.nps.gov/DoubleArch>
22

23 Comments must be received by the end of the review period. Before including your address, phone
24 number, e-mail address, or other personal identifying information in your comment, you should be aware
25 that under provisions of the Freedom of Information Act, your entire comment – including your personal
26 identifying information – may be made publicly available at any time. While you can ask us in your
27 comment to withhold your personal identifying information from public review, we cannot guarantee
28 that we will be able to do so.
29

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CHAPTER 1: PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS) has prepared this Environmental Assessment (EA) for safety improvements to the Natchez Trace Parkway Double Arch Bridge in accordance with the National Environmental Policy Act (NEPA), and the Council of Environmental Quality (CEQ) NEPA regulations as updated in the Final Rule, which became effective September 14, 2020 (Council on Environmental Quality 2020).

This EA was prepared to meet the NEPA requirements of both the NPS and Federal Highway Administration (FHWA). The Department of the Interior (which includes the NPS) issued its NEPA regulations as Part 516 of its Departmental Manual (516 DM), last revised in June 2020 (Department of the Interior 2020). In January 2011, the NPS updated the 2001 edition of Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making and the accompanying Handbook 12 (National Park Service, Director's Order #12: Conservation, Planning, Environmental Impact Analysis, and Decision Making 2011). The NPS NEPA handbook was released in 2015 (National Park Service 2015). The project is also being implemented in accordance with NPS cultural resource management guidelines (National Park Service 1998). The FHWA's NEPA regulations are codified at 23 CFR Part 771.

Project Background

The Natchez Trace Parkway (Parkway) was created as a unit of the national park system by Congress in 1938. The Parkway extends 444 miles from Nashville, Tennessee to Natchez, Mississippi (National Park Service 2014). Approximately 5 miles south of Nashville, visitors reach the Double Arch Bridge. **Figure 1** shows the location of the project. Constructed in 1994, the 1,572-foot long bridge spans across Birdsong Hollow approximately 155 feet above the valley. The bridge was the first segmentally constructed concrete arch bridge in the United States and in 1995 received the Presidential Award for Design Excellence for its innovative design (Federal Highway Administration 2017).

The bridge is a popular point of interest for Parkway visitors because of its unique design and because its height provides panoramic views of the surrounding area. A view of the bridge from Tennessee Highway 96 (SR 96) is shown in **Figure 2**. In 2000, approximately six years after the bridge was constructed, the first suicide occurred at the site. As of November 2021, 39 people have taken their lives by jumping off the bridge. In April 2019, the bridge was declared a public health hazard by the Tennessee State Legislature, Senate, and Governor (Tennessee General Assembly 2019).

In 2010 NPS began installing non-physical suicide deterrent systems, including signage with emergency and crisis phone numbers. Callboxes linked directly to crisis personnel were added in 2019. The non-physical deterrents did not reduce the rate of suicides which continued to occur about four times per year between 2015-2020. NPS initiated planning for temporary and permanent Physical Suicide Deterrent Systems (PSDS) in 2019.

Due to the urgent need to install a PSDS, a temporary chain-link fence is proposed along both sides of the bridge until a permanent PSDS can be completed. Construction of the temporary PSDS is expected to be complete in 2022. NPS assessed the impacts associated with a temporary PSDS and prepared a

NEPA Categorical Exclusion (CE) Documentation Form. NPS consulted with the United States Fish and Wildlife Service (USFWS) in accordance with Section 7 of the Endangered Species Act (ESA). NPS complied with Section 106 of the National Historic Preservation Act (NHPA) including consultation with the Tennessee Historical Commission, which serves as the State Historic Preservation Office (SHPO) in the state of Tennessee.

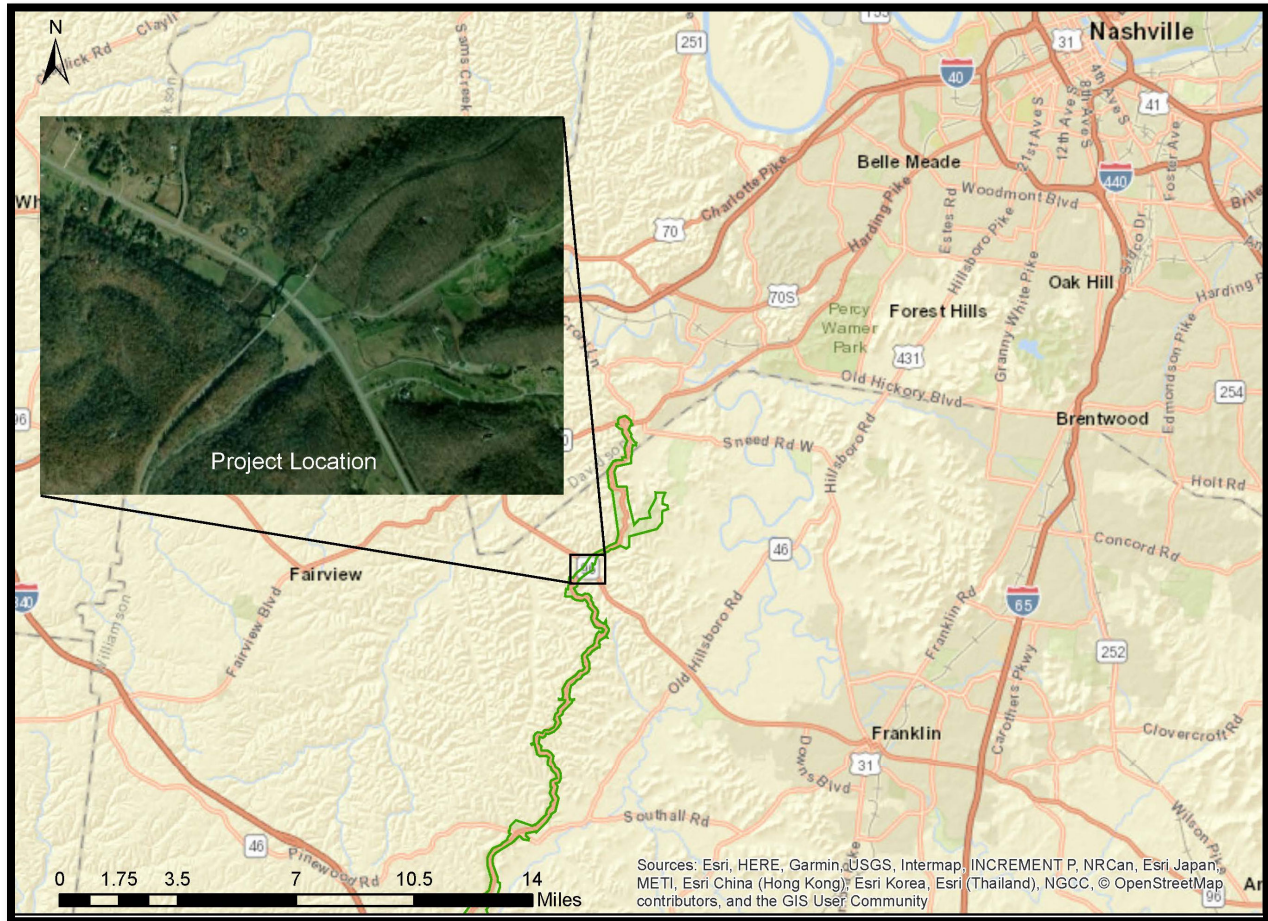


Figure 1. Location Map



Figure 2. View of the symmetrical arch over SR 96 looking northwest

PURPOSE OF THE ACTION

The purpose of this project is to develop a permanent PSDS for the Natchez Trace Parkway Double Arch Bridge that reduces injuries and fatalities, maintains the bridge's structural integrity, conserves the bridge's engineering significance, and preserves the public's scenic enjoyment of the Parkway.

NEED FOR THE ACTION

The Double Arch Bridge carries two 11-foot wide travel lanes of the Parkway across the valley. A 6-foot wide shoulder is present on each side of the travel lanes. The existing barrier on the outside edge of the bridge is 32 inches in height, and consists of a 18-inch concrete barrier with a 14-inch tall aluminum single rail mounted to the top of the concrete wall (**Figure 3**). When the bridge was originally designed, the barrier was intended to perform as a vehicular protection system only; however, Parkway visitors drive, bike, and walk across the bridge. The bridge railing does not sufficiently deter individuals from climbing over the bridge barrier and jumping. A temporary PSDS is being installed as an interim measure, but it does not meet long-term NPS management objectives.



Figure 3. Existing conditions looking southbound toward Tupelo

CHAPTER 2: DESCRIPTION OF ALTERNATIVES

NEPA requires that Federal agencies conduct a careful, complete, and analytical study of the impacts resulting from proposals that have the potential to affect the environment, and to consider alternatives to those proposals, well before any decision is made.

Fifteen potential PSDS alternatives, in addition to the no action alternative, were identified by a multi-disciplinary team. The team included subject matter experts from the FHWA, and engineering consultants experienced in bridge PSDS design. None of the PSDS alternatives under consideration would completely eliminate the possibility of additional suicides at the bridge. The PSDS would deter an individual from attempting to breach the barrier by allowing extra time to reconsider their intentions, seek help, or receive assistance from passers-by.

A high-level screening process and evaluation resulted in three alternatives retained that are evaluated in this EA in addition to the no action alternative. Conceptual design of the PSDS alternatives have been completed in conjunction with this EA. Further evaluation of PSDS alternatives may determine that crash testing would be required in accordance with the latest roadside safety guidelines. If deemed necessary, crash testing would occur as part of the final design process.

This chapter also includes mitigation measures which would be implemented under the action alternatives. Alternatives that were initially considered, but were dismissed from detailed analysis, are described in detail, along with the reason for their dismissal in the *Physical Suicide Deterrent System Report, Natchez Trace Parkway Double Arch Bridge* (Federal Highway Administration 2021).

NO ACTION ALTERNATIVE

CEQ regulations require consideration of a no action alternative and define the no action alternative as the continuation of current management. Under the no action alternative, no permanent PSDS would be constructed. Once installed in 2022, a temporary PSDS would remain in place indefinitely. **Figure 4** contains a partial engineering drawing prepared by FHWA showing an elevation view of the temporary PSTS. The temporary PSDS would consist of galvanized steel posts and chain-link mesh fencing attached to the interior face of the existing concrete barrier. The barrier would be topped with barbed wire and stand nine feet tall above the bridge deck. The upright posts and anchoring hardware would be located within the six-foot wide shoulders and clear zone on each side of the bridge.

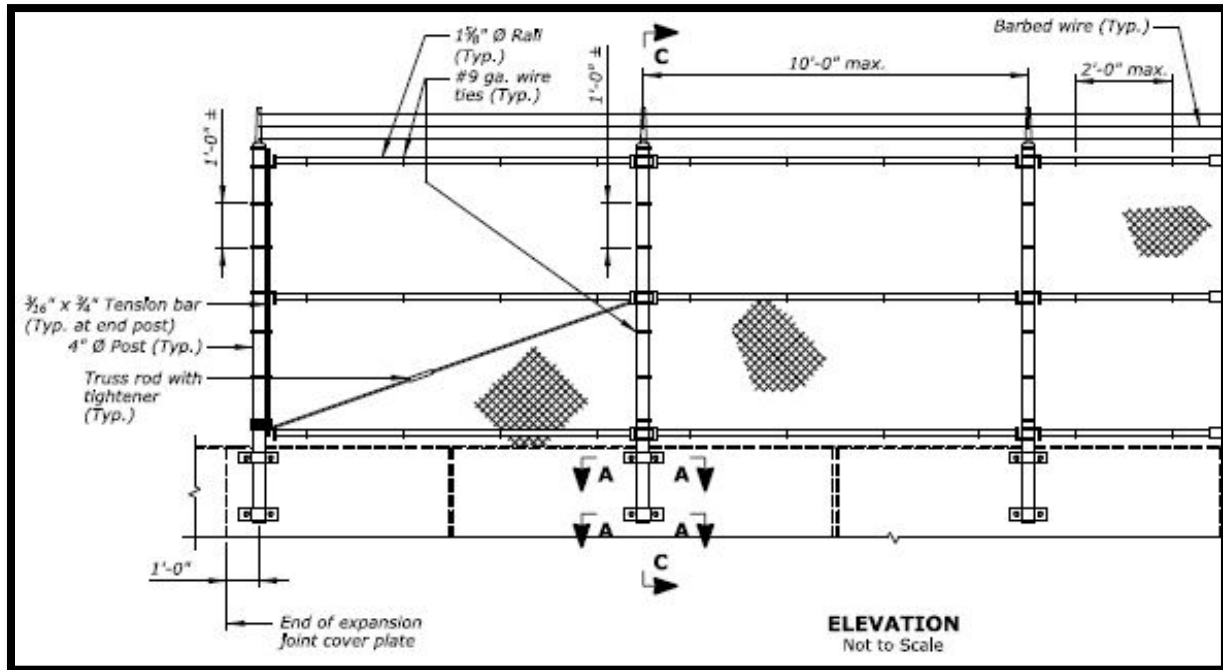


Figure 4. Partial engineering drawing for the temporary PSDS under the No Action Alternative

VERTICAL POSTS WITH ANGLED RETURNS (ACTION ALTERNATIVE 1, PROPOSED ALTERNATIVE)

Action Alternative 1 consists of vertical posts with angled returns supporting woven stainless-steel wire mesh. The design of this alternative minimizes changes to the existing bridge barrier and minimizes effects on the crashworthiness of the barrier. Action Alternative 1 would likely meet crash-worthy design criteria and not require crash testing. Action Alternative 1 is the proposed alternative and the NPS preferred alternative.

The PSDS would be connected to the exterior face of the existing barrier with concrete anchors. These concrete anchors (brackets) and vertical posts would be visible along the bridge profile when viewed from Birdsong Hollow Overlook. The existing vehicular barrier would not be otherwise altered and the existing lane and shoulder widths on the bridge would remain the same. The location of the PSDS at the exterior face of the bridge barrier would position the PSDS to minimize the potential conflicts with vehicles and cyclists. It would also reduce the potential for damage and maintenance to the system. The woven stainless-steel wire mesh would flex like a fiber rope netting, which would make the mesh more difficult to climb.

1 The color profile of the flexible stainless-steel wire mesh would be dull in appearance and less reflective
2 than the finish on the rigid stainless-steel mesh proposed under Action Alternative 2. Dull tones blend
3 better into the surrounding environment and make the fencing less apparent. The flexible mesh has a
4 smaller diameter wire resulting in 82.1 % open area, as compared to 76% open area for the rigid wire
5 mesh. The larger percentage of open space would create more visual transparency. The vertical posts
6 would include a dull and dark colored coating under each of the action alternatives.

7
8 This PSDS, pictured in **Figure 5**, would be 10 feet 8 inches tall when measured from the roadway surface.
9 Action Alternative 1 would not restrict someone from climbing the existing bridge barrier, and so to
10 meet the 8-foot height of the proposed system, the height of the PSDS would be set from the top of the
11 existing bridge barrier rail instead of the roadway surface.



14
15 **Figure 5. Visual rendering of Action Alternative 1**

16 ARCHED POSTS (ACTION ALTERNATIVE 2)

17 Action Alternative 2 consists of arched posts supporting rigid woven stainless-steel mesh, as shown on
18 the visual rendering in **Figure 6**. The arched posts provide a design that would be reminiscent of the
19 curved arches of the bridge itself. The bottom of the arched posts would meet the top of the existing
20 aluminum rail, and because of this design, Action Alternative 2 may require crash testing.

21
22 The PSDS would be connected to the exterior face of the existing barrier with concrete anchors. These
23 concrete anchors (brackets) and vertical posts would be visible along the bridge profile when viewed

1 from Birdsong Hollow Overlook. The existing vehicular barrier would not be altered and the existing
2 lane and shoulder widths on the bridge would remain the same. The bottom portion of the curved
3 members would be located on top of the existing aluminum rail, which increases the risk of vehicles
4 colliding with and damaging the deterrent system. The existing 10-inch gap between the top of the
5 concrete barrier and bottom of the aluminum rail would be modified by adding a mesh infill panel which
6 would minimize access to the concrete barrier as a stepping point.

7
8 Action Alternative 2 would use rigid stainless-steel wire mesh panels that would be more visible than the
9 woven mesh used in Action Alternatives 1 and 3. The rigid mesh would have a highly reflective finish.
10 The multi-disciplinary team analyzing Action Alternative 2 determined that the posts and rigid stainless-
11 steel wire mesh would be less visible if coated with a darker color, since darker tones blend better into
12 the surrounding environment; however, commercial sources for dark coated rigid stainless-steel wire
13 mesh have not been identified. The rigid wire mesh would have less open area (76%) compared to the
14 flexible mesh (82.1%) and would therefore appear less transparent.

15
16 This PSDS is 8 feet tall when measured from the roadway surface. The shape of the system and mesh
17 panel would make it difficult for someone to climb the existing bridge barrier rail, and so the 8-foot
18 height of the system would be measured from the roadway surface instead of the existing bridge barrier
19 rail.
20



21
22 **Figure 6. Visual rendering of Action Alternative 2**
23
24

VERTICAL POSTS WITH LONGITUDINAL RAIL (ACTION ALTERNATIVE 3)

Action Alternative 3 consists of vertical posts with longitudinal rail supporting woven stainless-steel wire mesh (**Figure 7**). This alternative requires removal of the existing aluminum barrier rail and post system and replacement with a new top mounted PSDS that has a longitudinal rail integrated into the design and positioned to be flush with the front face of the existing concrete barrier. The top of the longitudinal rail would be installed at a height of 32 inches, the same height of the existing rail. The new integrated PSDS and barrier rail system would likely require crash testing. This PSDS would be 10 feet 8 inches tall when measured from the roadway surface. Action Alternative 3 would not restrict someone from climbing onto the concrete barrier or new longitudinal rail, and so the 8-foot height would be set from the top of the new longitudinal rail instead of the roadway surface.

The existing vehicular (concrete) barrier would not be altered and the existing lane and shoulder widths on the bridge would remain the same. The PSDS and the proposed longitudinal rail for the bridge barrier would be supported by the same posts. This would pose an increased risk of damage to the PSDS resulting from a motor vehicle accident compared to Action Alternative 1 and Action Alternative 2 which would have vertical posts attached to the exterior of the existing barrier.

Action Alternative 3 would use the same flexible stainless-steel wire proposed under Action Alternative 1. This woven mesh is designed to flex like a fiber rope netting, which makes the mesh more difficult to climb. The dull coating and larger percentage of open area would make Action Alternative 3 less visible and more transparent than Action Alternative 2.



Figure 7. Visual rendering of Action Alternative 3

CONSTRUCTION ACCESS AND STAGING

A temporary detour would be implemented during construction for all three action alternatives. A map of the temporary detour is shown in **Figure 8**. A two-mile long section of the Parkway between SR 96 and Big Tree Overlook would be closed to all public traffic. Northbound traffic would exit the Parkway at SR 96, follow a 7.5-mile long detour route on existing roads, and rejoin the Parkway at the SR 100 interchange. From SR 100, visitors would be able to continue approximately three miles south to the Big Tree Overlook. Visitors would turn around at Big Tree Overlook and return northbound to the SR 100 detour route. Those wishing to continue southbound beyond the road closure would exit the Parkway at SR 100, follow the signed detour route, and access the Parkway at the SR 96 ramp.

Once construction begins, equipment and materials would be stored near the project site for the duration of the project. All three action alternatives would be constructed from the road and bridge. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the Birdsong Hollow Overlook parking area adjacent to the bridge.

MITIGATION MEASURES

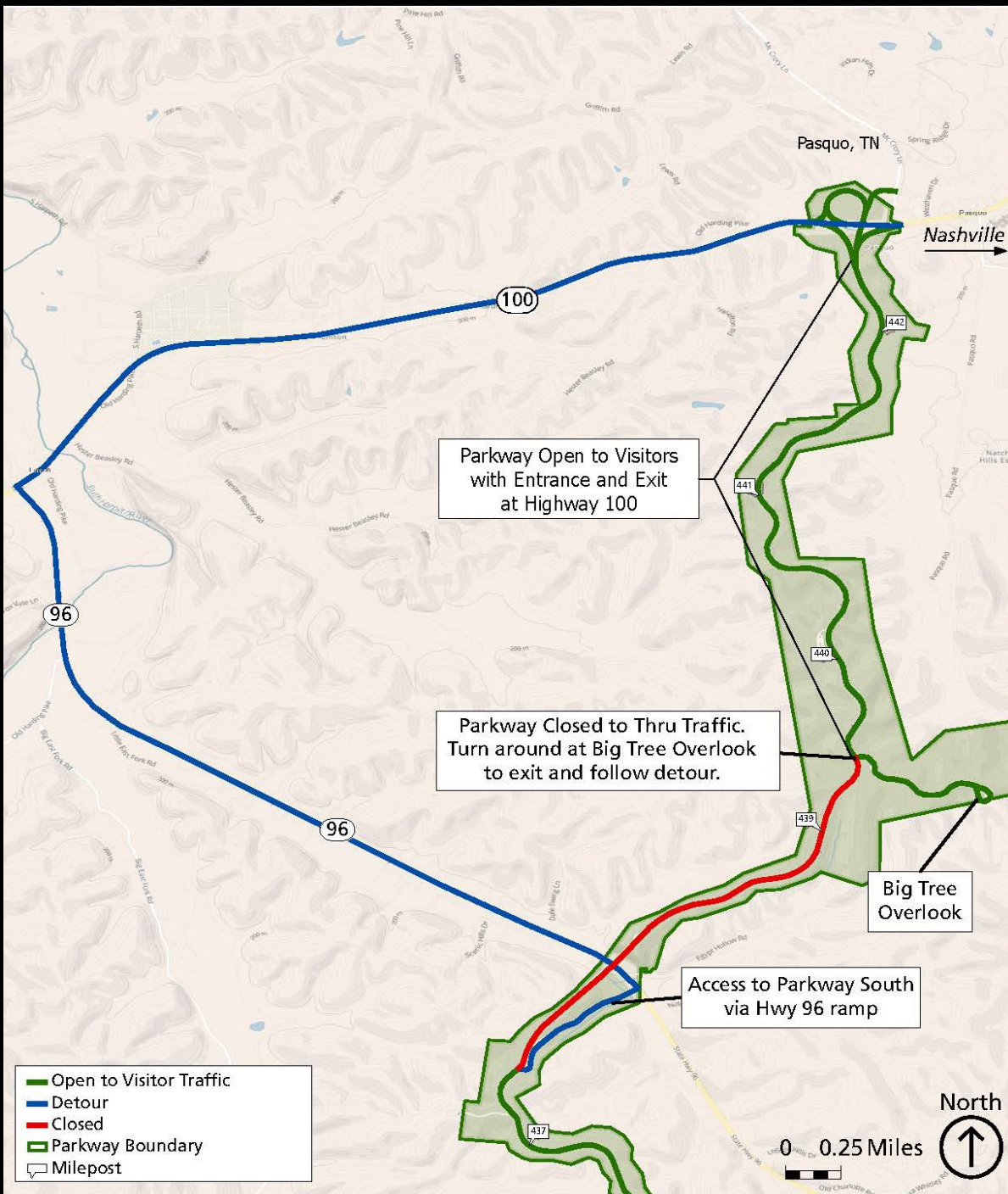
Avoidance, minimization, and mitigation measures would be implemented to prevent or minimize potential adverse effects associated with the Action Alternatives. These measures would be incorporated into the project design and construction plans.

- Staging would occur in existing paved and developed areas to minimize ground disturbance
- Debris shields would be installed below the bridge to protect land, pedestrians, and motorists from falling objects or other debris.
- Minimal soil disturbance may be required during installation of the debris shield. Silt fence or other sediment control barriers would be installed to protect adjacent areas. Any disturbed areas would be stabilized and revegetated.
- Adverse impacts to the historic bridge and Parkway landscape were resolved in consultation with the SHPO. On February 17, 2022, a Memorandum of Agreement (MOA) was signed by NPS, FHWA and the SHPO in accordance with NHPA Section 106 (see **Appendix B**).
- Per Stipulation I of the MOA, the bridge was documented by a professional meeting the Secretary of Interior's Professional Qualification Standards (36 CFR 61, Appendix A) prior to installation of the PSDS. Documentation was prepared in accordance with the requirements set forth in 68 FR 43159 and the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation Requirements.

TN - 96 Bridge Detour

Natchez Trace Parkway

National Park Service
U.S. Department of the Interior



Data Provided by: NPS, USGS, OpenStreetMap

January 2021

Figure 8. Double Arch Bridge closure detour route

CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the existing environmental conditions in and around the project area and the potential impacts of each alternative presented in Chapter 2.

The updated Council on Environmental Quality (CEQ) regulations (40 CFR 1508.1(g)) require the assessment of environmental impacts, which are defined as changes to the to human environment from the proposed action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including those effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives (Council on Environmental Quality 2020).

For each impact topic, the analysis includes a description of the impacts (both adverse and beneficial) and a discussion of the importance of the impacts in consideration of the resource context and the intensity of the impact. The impact analysis is based on input from a multi-disciplinary team with knowledge of the resources and experience implementing similar projects.

ISSUES AND IMPACT TOPICS

Issues as discussed in NEPA describe the relationships between the action being proposed and the environmental (natural, cultural, and socioeconomic) resources. Issues identified by the multi-disciplinary team and the associated impact topic are listed below.

- Changes to the original design would affect features of the bridge, which is eligible for listing on the National Register of Historic Places (NRHP); therefore, *Historic Structures* is carried forward as an impact topic.
- The entire Parkway is eligible for listing as a historic designed landscape. PSDS would modify the original design and impact the scenic value of the area; therefore, *cultural landscapes* are carried forward as an impact topic.
- The project would require temporary closure of the bridge to motorists, cyclists, and pedestrians. A temporary detour would be implemented. Circulation on the Parkway would not be permanently changed, but the popular visitor gathering and viewing point along the bridge deck would be permanently altered; therefore, *Visitor Use and Experience* is carried forward as an impact topic.

HISTORIC STRUCTURES

Affected Environment

The NHPA authorized creation of the NRHP; a list of districts, sites, buildings, structures and objects that are significant in American history, architecture, archaeology, engineering, and culture (National Park Service n.d.). For a structure to be listed on or eligible for listing on the NRHP, it must possess historic integrity of those features necessary to convey its significance, particularly with respect to location, setting, design, feeling, association, workmanship, and materials.

NPS determined the Natchez Trace Parkway Double Arch Bridge is a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the NRHP under National Register Criterion C in that it embodies “distinctive characteristics of a type, period, or method of construction...”, and under Criteria Consideration G as “a property achieving significance within the past 50 years if it is of exceptional importance.”

The bridge was the nation's first segmentally constructed concrete arch bridge. The double arch structure offers travelers a view from 155 feet above the valley floor and was one of the final links in completing the Parkway's northern district. The bridge's arches are designed to support the bridge superstructure without evenly spaced spandrel columns (vertical columns constructed between the arch ribs and superstructure), which results in a picturesque unencumbered appearance (Federal Highway Administration 2017). The 37-foot wide bridge carries two lanes of traffic, six-foot wide shoulders, and concrete/aluminum rail barriers. **Figure 9** provides additional dimensions of the structure. The existing aluminum rail and concrete barrier can be seen in **Figure 10**.

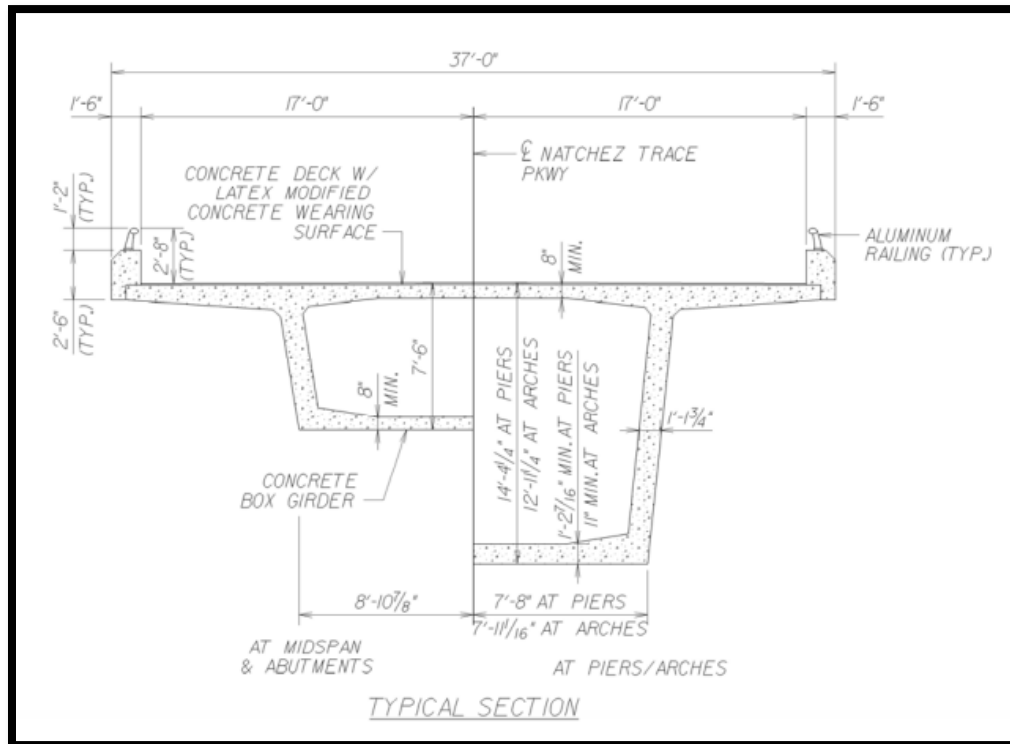


Figure 9. Typical section

A temporary PSDS is being installed and would remain in place until the permanent system is constructed. The temporary PSDS consists of galvanized steel posts, chain-link mesh fencing, and barbed wire attached to the interior face of the existing concrete barrier.

The Natchez Trace Double Arch Bridge is one of 485 Parkway bridges, many of which are historic structures. Installation of a PSDS has not occurred previously on or near the Parkway and is not under consideration at any other known locations. The modification of bridges to include PSDS does not represent a trend that would diminish the historic character of additional Parkway historic bridges or structures.

Direct and Indirect Environmental Consequences on Historic Structures

No Action Alternative

Under the No Action Alternative, a permanent PSDS would not be installed on the structure. After installation in 2022 the temporary PSDS would remain indefinitely. The temporary PSDS would be anchored to the interior face of the existing concrete barrier and would prevent up-close viewing of these character defining features. The galvanized steel posts, mesh, and barbed wire would remain more visibly obtrusive compared to the action alternatives. The bridge deck width would be slightly reduced since the temporary PSDS would be located on the edge of the shoulder.



Figure 10. Aluminum railing attached to the concrete barrier

Action Alternative 1

Under Action Alternative 1, the existing concrete barrier wall and aluminum rail would remain in place, and concrete anchors would connect the PSDS to the exterior face of the existing barrier. The installation of the concrete anchors would result in minor disfigurement of the exterior side of the concrete barrier. The metal rail would remain unaltered.

The PSDS would introduce a new, discernably different, modern feature on the bridge which would adversely affect the NRHP eligible structure. The adverse effects would be mitigated in accordance with the stipulations of the MOA (**Appendix B**). The impacts would not be severe enough to negate the NRHP eligibility status of the bridge or the Natchez Trace Parkway historic property. Action Alternative 1 would have minor beneficial impacts on the structure by removing the temporary PSDS, repairing the anchor holes, and providing a more visually compatible PSDS. Action Alternative 1 would require less

alteration to the original structure and have less adverse effects on historic structures compared to Action Alternative 2 and Action Alternative 3. Permanent PSDS has not been installed or proposed at any known locations near the project area; therefore, Action Alternative 1 would not contribute to a trend that has the potential to adversely impact Parkway historic structures as a whole.

Action Alternative 2

Under Action Alternative 2, the existing concrete barrier and aluminum rail would remain in place, and concrete anchors would connect the PSDS to the exterior face of the existing barrier. The installation of the concrete anchors would result in minor disfigurement of the exterior side of the concrete barrier. The existing metal rail, a character-defining feature of the original design, would be altered by the addition of a mesh infill panel.

Alternative 2 would adversely affect the NRHP eligible structure by introducing a new, discernably different, modern feature on the bridge and altering the original rail. The adverse effects would be mitigated in accordance with the stipulations of the MOA. The adverse effects of Action Alternative 2 would be greater than Action Alternative 1 since the original rail would be modified but would not be severe enough to negate the NRHP eligibility status of the bridge or the Natchez Trace Parkway historic property. Action Alternative 2 would have minor beneficial impacts on the structure by removing the temporary PSDS, repairing the anchor holes, and providing a more visually compatible PSDS. Permanent PSDS has not been installed or proposed at any known locations near the project area; therefore, Action Alternative 2 would not contribute to a trend that has the potential to adversely impact Parkway historic structures as a whole.

Action Alternative 3

Under Action Alternative 3, the existing concrete barrier would remain in place; however, the aluminum railing, including the posts, would be removed. The bridge railing is a character-defining feature of the original bridge design. Damage caused by removing the post anchors and bolts would be repaired by grouting or patching any damaged concrete. The PSDS with an integrated railing would be attached to the top of the existing concrete barrier with new connections.

Alternative 3 would adversely affect the NRHP eligible structure by introducing a new, discernably different, modern feature on the bridge and removing the original rail. The adverse effects would be mitigated in accordance with the stipulations of the MOA. The adverse effects of Action Alternative 3 would be greater than Action Alternative 1 or Alternative 2 since the original rail would be removed and replaced with an integrated PSDS rail system. The adverse effects would not be severe enough to negate the NRHP eligibility status of the bridge or the Natchez Trace Parkway historic property. Action Alternative 3 would have minor beneficial impacts on the structure by removing the temporary PSDS, repairing the anchor holes, and providing a more visually compatible PSDS. Permanent PSDS has not been installed or proposed at any known locations near the project area; therefore, Action Alternative 3 would not contribute to a trend that has the potential to adversely impact Parkway historic structures as a whole.

CULTURAL LANDSCAPES

Affected Environment

The Parkway was conceived and developed as a designed landscape that integrates a traditional rural, agrarian, southern landscape experience. Defining characteristics of the designed landscape include the curvilinear road elements, stonework, mowed areas, preserved vegetation, scenic overlooks and viewsheds. Specific elements of the cultural landscape within the project area include the Birdsong Hollow Overlook, Birdsong Hollow Overlook Parking Area, the Visitor Viewpoint at SR 96, the Parkway approaching the bridge, the Double Arch Bridge, as well as maintained grass and forested areas. A photo of the curved masonry wall overlooking the bridge at the Birdsong Hollow Overlook is shown in **Figure 11**.

Visitors traveling across the bridge have unobstructed views of the surrounding landscape. People frequently park near either end of the bridge and walk along the railing to observe the views, particularly at sunset. A view from the bridge deck can be seen in **Figure 12**. The current views would be altered after the installation of a temporary PSDS in 2022. The temporary PSDS would consist of galvanized steel posts, chain-link mesh fencing, and barbed wire attached to the interior face of the existing concrete barrier.

The entire Parkway is eligible for listing in the NRHP under Criterion A since it is “associated with events that have made a significant contribution to the broad patterns of our history.” It is also eligible under Criterion C since it embodies “the distinctive characteristics of a type, period, or method of construction.” Although the last section of Parkway was completed in 2005, the NRHP guidelines for evaluating significance of a property clearly state that if a property has gained significance within the last 50 years, “such properties will qualify if they are integral parts of districts that do meet the criteria.”

The Parkway’s designed landscape was part of a larger NPS initiative that started in the 1920s. Based on the rise in popularity of automobiles, NPS began to include motor touring as a primary component of several eastern parks. The first such NPS roadway, Skyline Drive in the Blue Ridge Mountains of Virginia, was intended to be the “greatest single feature” of the Shenandoah National Park, which was authorized by Congress in 1926 (Engle 2006). During the 1930s, NPS continued this design philosophy by establishing a new park unit designation known as a “parkway” to promote scenic and leisurely driving. The roads were designed to link scenic, natural, and cultural features of interest. The first parkways authorized by Congress were The George Washington Memorial Parkway (1930), the Blue Ridge Parkway (1933) and the Natchez Trace Parkway (1934).

In 1938 NPS described the design elements of a parkway and how these design elements differed from a highway:

1. Designated for recreational use only; no commercial use allowed
2. Avoids unsightly roadside development
3. Built within a wider right-of-way to provide an insulating strip of land between the motor road and adjoining private property
4. Eliminated frontage, access rights and major at-grade crossings
5. Bypassed large communities and congestion
6. Entrance and exit points distantly spaced
7. Designed to take advantage of the best scenery through which it traversed; therefore, the shortest and most direct route was not a primary consideration

1 8. Preserves natural scenic values

2
3 The Parkway was designed along those criteria to provide Park visitors with a recreational travel
4 experience, highlighting traditional rural southern landscapes, scenic views, and natural and cultural
5 resources (National Park Service 2017).



6
7 **Figure 11. View of the bridge from the Birdsong Hollow Overlook**

8
9 The designed cultural landscape and Parkway viewsheds have been continually impacted by
10 development since the 1930's. Some of the past, present, and reasonably foreseeable future actions
11 that adversely impacted the cultural landscape include the following:

- 12 • Right-of-Way acquisition for major highways, crossings, access roads, and utilities
13 • Adjacent development of agricultural and forested areas within the Parkway viewshed
14 • Commercial activity, including strip mining and factory operations, within the Parkway viewshed
15 • Parkway maintenance, modernization, safety improvements, rehabilitation, and reconstruction

16 These actions represent a trend that is expected to continue, particularly within the viewshed outside of
17 the Parkway boundary. The trend would further diminish cultural landscapes and viewsheds. This will
18 necessitate a determination by the NPS when the impacts of future individual projects become
19 significant.

Direct and Indirect Environmental Consequences on Cultural Landscapes

No Action Alternative

The No Action Alternative would have no additional impacts on the cultural landscape; however, after installation in 2022, the temporary PSDS would remain in place indefinitely. The temporary PSDS would contrast with the engineered design of the bridge and would be visible from Birdsong Hollow Overlook and the Visitor Viewpoint at SR 96. The galvanized steel and stark design used in the temporary PSDS would be more visible and obtrusive compared to the context sensitive approaches proposed under the Action Alternatives. The bridge deck width would be slightly reduced since the temporary PSDS would be located on the edge of the shoulder. The temporary PSDS would be less compatible with the cultural landscape compared to the Action Alternatives.

Action Alternative 1

During construction of each action alternative, visitors would not be able to access the bridge to observe the surrounding landscape. The nearby Birdsong Hollow Overlook parking area would be used as a staging area, temporarily restricting access to another popular viewpoint and designed landscape component. The Visitor Viewpoint at SR 96 would remain open during construction. These temporary impacts would be minor and would be resolved when the bridge and parking area are reopened.

After construction, the PSDS system would be noticeably present on the landscape. Scenic values would be slightly diminished by the upright posts and woven, stainless-steel mesh. The vertical posts would partially obstruct views from certain vantage points, especially for those gathering on the bridge deck to observe the sunset or take photographs. The dark coating on the PSDS would help it blend into the landscape and reduce reflections or glare. The mesh wire would be less visible than the rigid stainless-steel variety proposed under Action Alternative 2.

The presence of mesh can create a challenge for photographers. Modern cameras may automatically focus on the mesh, leaving the intended landscape image blurry. Reflections from the sun can also cause a glare. A dark coating on the mesh would minimize reflection and glare. The use of manual focus and the placement of the camera as close to the mesh as possible are among numerous strategies suggested by photography experts to improve results when filming through mesh (DPS nd).

The PSDS would adversely affect the designed landscape of the NRHP eligible Parkway by introducing a new, discernably different, modern feature. The addition of the PSDS supports on the outside of the bridge would disrupt the profile line of the structure when viewed from below and from Birdsong Hollow Overlook. Impacts to the landscape and viewsheds would be less severe under Action Alternative 1 compared to Action Alternative 2 and Action Alternative 3 because the add-on approach of Action Alternative 1 clearly differentiates between the original bridge structure and the new PSDS. The adverse effects would be mitigated in accordance with the stipulations of the MOA (**Appendix B**) and would not be severe enough to negate the NRHP eligibility status of the Natchez Trace Parkway historic property. Action Alternative 1 would have minor beneficial impacts on the cultural landscape by removing the temporary PSDS and providing a more visually compatible PSDS.

Action Alternative 1 would incrementally contribute to the trend of adverse impacts on the cultural landscape caused by past, present, and reasonably foreseeable actions. The alternative would not result in severe impacts that would significantly contribute to the trend or cause the Parkway landscape to be ineligible for the NRHP.

Action Alternative 2

Action Alternative 2 would introduce a new, discernably different, modern feature on the bridge and adversely affect the designed landscape of the Parkway. The alternative would maintain the existing metal railing and attach the PSDS to the exterior face of the concrete barrier. This would allow for clear differentiation between the original bridge structure and the new PSDS. The addition of the PSDS supports on the outside of the bridge would disrupt the profile line of the structure from nearby viewpoints. The curved form of the system pays homage to the design of the existing bridge; however, the unique system would draw attention to itself and distract from the simplicity of the original structure.

At 8 feet above the road surface, the overall height of this alternative would be 2 feet 8 inches shorter than Action Alternative 1 and Action Alternative 3 resulting in less vertical viewshed impacts. The curved posts would be more closely spaced than the other action alternatives, resulting in more obstructed vantage points for visitors standing on the bridge deck or driving across the bridge.

This alternative requires the use of rigid stainless-steel panels to achieve the curved form, which would diminish scenic views from the bridge. The mesh would be less transparent (76% open area) compared to the woven stainless-steel mesh used in Action Alternative 1 and Action Alternative 3 (82.1% open area). If a source for commercial or custom made dark coated, rigid, stainless-steel mesh could not be found, noticeable reflections and glare could occur. Photographers would be more likely to encounter the issues described under Action Alternative 1.

Impacts to the landscape and viewsheds would be more severe under Action Alternative 2 compared to Action Alternative 1 and Action Alternative 3 because the arched form, mesh type, and post configuration would be more apparent. The adverse effects would be mitigated in accordance with the stipulations of the MOA and would not be severe enough to negate the NRHP eligibility status of the Natchez Trace Parkway historic property. Action Alternative 1 would have minor beneficial impacts on the cultural landscape by removing the temporary PSDS and providing a more visually compatible PSDS.

Action Alternative 2 would incrementally contribute to the trend of adverse impacts on the cultural landscape caused by past, present, and reasonably foreseeable actions. The alternative would not result in severe impacts that would significantly contribute to the trend or cause the Parkway landscape to be ineligible for the NRHP.

Action Alternative 3

Action Alternative 3 would require removal of the original railing, a character-defining feature of the parkway landscape. The removal of the rail and replacement with a new integrated barrier rail and PSDS would create a system that appears more cohesive, but would still introduce a discernably different feature to the designed landscape. Although the PSDS would be visible when viewed from below and from Birdsong Hollow Overlook, the railing would be attached to the top of the concrete barrier, and so the connections to the bridge would not be visible. The PSDS would result in less changes to the bridge profile compared to the other action alternatives.

This alternative uses the same type of highly transparent, woven, stainless-steel mesh infill system discussed under Action Alternative 1. The vertical posts would partially obstruct scenic views from certain vantage points for visitors. The landscape alterations would also be visible from nearby viewpoints. Photography could be affected as described under Action Alternative 1.

The PSDS would adversely affect the designed landscape of the NRHP eligible Parkway by removing a character defining feature and introducing a new, discernably different, modern element. Action Alternative 3 would preserve less of the original landscape features compared to Action Alternative 1 and Action Alternative 3. The adverse effects would be mitigated in accordance with the stipulations of the MOA and would not be severe enough to negate the NRHP eligibility status of the Natchez Trace Parkway historic property. Action Alternative 3 would have minor beneficial impacts on the cultural landscape by removing the temporary PSDS and providing a more visually compatible PSDS.

Action Alternative 3 would incrementally contribute to the trend of adverse impacts on the cultural landscape caused by past, present, and reasonably foreseeable actions. The alternative would not result in severe impacts that would significantly contribute to the trend or cause the Parkway landscape to be ineligible for the NRHP.



Figure 12. View from bridge looking south

VISITOR USE AND EXPERIENCE

Affected Environment

The Parkway was created by Congress as a unit of the national park system in 1938 to commemorate the historic Old Natchez Trace travel corridor. Construction of the parkway motor road was completed in 2005. The Old Natchez Trace is one of the oldest transportation routes in North America. The Parkway was designated as a National Scenic Byway and All-American Road in 1996 for its significant historic, cultural, natural and scenic qualities (National Park Service 2014).

Millions of people visit the Parkway each year (National Park Service 2021) to take advantage of the many available recreational opportunities, which include motor touring and cycling. The number of motorists and cyclists using the Parkway has increased in recent years. There have been efforts to promote cycling in parks across the nation including events such as the “Car Free Parkway Experience” days for bicyclists and pedestrians to use sections of the Parkway while no vehicle traffic is allowed.

Annual average daily traffic at this location on the Parkway is approximately 490 vehicles per day, based on traffic counts taken in April of 2019 and 2018 Visitor Use Statistics. The Double Arch Bridge is a popular point of interest for Parkway visitors because of the architectural and scenic characteristics of

the site. People frequently walk along the edges of the bridge to observe the views, particularly at sunset. The Birdsong Hollow Overlook parking area, a proposed staging area located north of the bridge, provides access to an overlook with a view of the bridge and valley.

A temporary PSDS would be installed in 2022 and would remain in place until the permanent system is constructed. The temporary PSDS would consist of galvanized steel posts, chain-link mesh fencing, and barbed wire attached to the interior face of the existing concrete barrier. The temporary PSDS would be located on the bridge shoulders, slightly reducing the deck width.

Many past and present actions implemented by NPS were part of a trend intended to benefit visitors by providing improved safety, services, and recreational opportunities. Examples of projects that improved visitor experience overall include:

- Parkway maintenance, rehabilitation, and reconstruction
- Construction of the Chickasaw Museum and Cultural Center
- Planning and construction of new multi-use trails

The trend of improved visitor services is expected to continue in the future as part of the NPS mission. Although these projects are intended to provide permanent beneficial impacts to visitor use and experience, they also have some adverse effects, such as construction impacts.

Certain past and present actions represent a trend that has incrementally impacted visitor use and experience since the 1930's. Such projects contribute to diminished views, increased congestion, and impacts to environmental resources. Some actions include the following:

- Right-of-Way acquisition for major highways, crossings, access roads, and utilities
- Adjacent development within the Parkway viewshed
- Commercial activity, including strip mining and factory operations

The adverse impacts of future actions on visitor experience can be minimized on NPS property through careful planning and design. The trends of development and commercial activity adjacent to the Parkway are expected to continue in the future, and would adversely impact Visitor Experience. The impacts would be incremental and eventually could significantly impact Parkway visitors by altering the rural viewshed.

Direct and Indirect Environmental Consequences on Visitor Use and Experience

No Action Alternative

Under the No Action Alternative, the temporary PSDS would remain in place indefinitely after it is constructed in 2022. The temporary PSDS would be anchored to the interior face of the existing concrete barrier in the roadside clear zone. The temporary PSDS would slightly reduce the bridge deck width making the area less accessible and less safe for pedestrians. Motorists would be more likely to collide with and damage the system compared to the action alternatives because the posts and fencing would be located in the roadway clear zone. The galvanized steel posts, mesh, and barbed wire would be visibly obtrusive and diminish visitor enjoyment of the area.

Action Alternative 1

Under Action Alternative 1, visitors would be noticeably inconvenienced during construction because a full closure of the bridge would occur. Construction would last approximately 15 months. A temporary detour would be implemented during construction. The detour follows SR 96 and SR 100 through scenic rural countryside and adds a distance of 2.7 miles. The detour would not result in a significant delay since it would not pass through any populated or heavily congested areas and the speed limit on both

roads is higher than the Parkway. During construction, visitors would not be able to access the bridge deck to observe the views, watch the sunset, or take photographs. The nearby Birdsong Hollow Overlook parking area would be used as a staging area, temporarily restricting visitor access. A two-mile long section of the Parkway between SR 96 and Big Tree Overlook would be closed to public traffic. The Visitor Viewpoint at SR 96 would remain open, but construction activity may be visible and audible.

After the completion of construction, access to the bridge and overlook would be restored. Visitors would be able to travel through this section of the Parkway to experience the expansive views of the valley. The PSDS system would be noticeably present. Views would be partially obscured by the upright posts and woven, stainless-steel mesh. The mesh wire would appear more transparent than the rigid stainless-steel variety proposed under Action Alternative 2. A dark coating on the PSDS would help it blend into the landscape and reduce reflections or glare. Visitors may still have difficulty taking clear, well focused photographs through the mesh. PSDS can also trap litter and debris which would further contribute to diminished visitor experience.

Fencing present along roadways is typically viewed as diminishing the landscape; however, it can also make drivers feel more comfortable (Tay 2008). Compared to the existing low concrete barrier and metal railing, the PSDS would make visitors safer if they were walking or cycling along the side of the bridge. Action Alternative 1 would not encroach on the roadside clear zone. Since the PSDS would be attached to the exterior of the concrete barrier, there would be minimal risk that pedestrians, bicycles or vehicles would come into contact with the system, potentially causing injury or damage (Federal Highway Administration 2021).

Construction of Action Alternative 1 would be completed faster than Action Alternative 2 or Action Alternative 3, resulting in less temporary impacts to visitors. Although Action Alternative 1 would have a minor negative impact on visitor experience by permanently diminishing scenic value, the PSDS would provide some benefits to visitor experience. The visually and physically obtrusive temporary PSDS would be replaced with a more compatible structure. The permanent PSDS would improve safety for visitors by reducing fatalities and injuries.

Action Alternative 1 would incrementally contribute to a trend of beneficial impacts caused by past, present, and reasonably foreseeable future projects by improving safety; however, the Alternative would also represent an increment to the trend of adverse impacts on visitor experience by diminishing the scenic values of the project location.

Action Alternative 2

Under Action Alternative 2, the full bridge closure and temporary detour described under Action Alternative 1 would be implemented. The construction duration and temporary impacts for Action Alternative 2 would be approximately 18 months, the longest of the three action alternatives; therefore, Action alternative 2 would have the biggest adverse temporary impact on visitor use and experience.

Action Alternative 2 would result in minor permanent adverse impacts on visitor use and experience. The closely spaced posts would partially obstruct views from more vantage points and the rigid stainless-steel mesh panels would appear less transparent than Action Alternative 1 and Action Alternative 3. Photographers would experience a greater frequency of poorly focused or partially obstructed pictures.

1 Although Action Alternative 2 would have a minor negative impact on visitor experience by permanently
2 diminishing scenic value, the PSDS would provide important benefits to visitor experience. The visually
3 and physically obtrusive temporary PSDS would be replaced with a more compatible structure. The
4 permanent PSDS would improve safety for visitors by reducing fatalities and injuries. Action Alternative
5 2 would provide less safety benefits than Action Alternative 1 because, under Action Alternative 2, the
6 mesh infill panel attached between the existing concrete barrier and metal railing would be located
7 within the roadside clear zone. Motor vehicles could damage the lower portion of the PSDS during a
8 collision (Federal Highway Administration 2021).

10 Action Alternative 2 would incrementally contribute to a trend of beneficial impacts caused by past,
11 present, and future safety improvement projects by improving safety; however, the Alternative would
12 also represent an increment to the trend of adverse impacts on visitor experience by diminishing the
13 scenic values of the project location.

15 Action Alternative 2 would incrementally contribute to a trend of beneficial impacts caused by past,
16 present, and reasonably foreseeable future projects by improving safety; however, the Alternative
17 would also represent an increment to the trend of adverse impacts on visitor experience by diminishing
18 the scenic values of the project location.

20 **Action Alternative 3**

21 Under Action Alternative 3, the full bridge closure and temporary detour described under Action
22 Alternative 1 would be implemented. The construction duration and adverse temporary impacts for
23 Action Alternative 3 would be approximately 16 months, slightly longer than Action Alternative 1.

25 Action Alternative 3 would have a minor negative impact on visitor experience by permanently
26 diminishing scenic value. Action Alternative 3 would provide the most visually appealing design since it
27 would have a cohesive PSDS with less impacts to the bridge profile. The PSDS would include dark-
28 coated, woven, stainless-steel mesh to provide higher transparency compared to the rigid mesh
29 proposed under Action Alternative 2.

31 Action Alternative 3 would benefit visitor use and experience by replacing the temporary PSDS with a
32 more compatible structure. The permanent PSDS would provide safety benefits, but the entire PSDS
33 would be located within the roadside clear zone. Pedestrians or cyclists would have an increased risk of
34 coming into contact with the PSDS, potentially causing injury. The PSDS would be highly susceptible to
35 impact damage in the event of a motor vehicle collision (Federal Highway Administration 2021).

37 Action Alternative 3 would incrementally contribute to a trend of beneficial impacts caused by past,
38 present, and reasonably foreseeable future projects by improving safety; however, the Alternative
39 would also represent an increment to the trend of adverse impacts on visitor experience by diminishing
40 the scenic values of the project location.

CHAPTER 4: PUBLIC INVOLVEMENT AND COORDINATION

This chapter documents the public involvement and agency coordination and consultation completed for the project.

PUBLIC INVOLVEMENT

Suicides at the bridge have been a concern for more than twenty years. The high rate of deaths has received local, regional, and national media coverage. The Natchez Trace Barrier Coalition was formed in 2018 by the friends and families of those who took their lives by jumping off the bridge. NPS has worked closely with the coalition whose goal is to have a PSDS installed on the bridge. Public awareness increased in April 2019 when the bridge was declared a public health hazard by the Tennessee State Legislature, Senate, and Governor (Tennessee General Assembly 2019). In August 2019, the Parkway Superintendent announced that funding had been secured for the permanent PSDS.

This EA will be open for public review from May 16, 2022 until June 17, 2022 on the NPS' Planning, Environment and Public Comment (PEPC) website at: <https://parkplanning.nps.gov/DoubleArch>

Comments will be accepted electronically through the PEPC website and must be received before the end of the 33-day review period. Prior to including your address, phone number, e-mail address, or other personal identifying information in your comment, be aware that under provisions of the Freedom of Information Act, your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Comments on this EA will be summarized and responded to in an Errata sheet to be appended to the decision document. If substantive comments are received that require a response, they will be addressed in a Response to Comments appendix.

AGENCY COORDINATION AND PERMITS

Other agencies were contacted during the planning process. Appendix A contains copies of written correspondence with those agencies. There would be no impacts to wetlands or waterways that would require a permit from the US Army Corp of Engineers or the Tennessee Department of Environment and Conservation (TDEC). Installation of the debris shield may cause minimal ground disturbance within the maintained grassy area beneath the bridge. NPS and FHWA would implement strict erosion and sediment control practices but do not anticipate exceeding the one-acre threshold that would require a National Pollutant Discharge Elimination System permit from TDEC. If the need for environmental permits is identified during the design process, NPS and FHWA would obtain such approvals.

Endangered Species Act of 1973 Coordination and Consultation

An official species list was obtained for the project area from the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) System. The list (Consultation Code: 04ET1000-2021-SLI-0366) contained the following Federally listed threatened and endangered species: gray bat, Indiana bat, northern long-eared bat, leafy prairie-clover, and Price's potato-bean. The IPaC determination key was used to evaluate the potential for impacts to the northern long-eared bat and

1 Indiana bat. A verification letter was obtained for the project, confirming that the project is consistent
2 with the Programmatic Biological Opinion for Transportation projects.

3
4 In a letter dated February 17, 2021, FHWA and NPS described the potential for the project alternatives
5 to impact Federally listed species. Although bats have been documented roosting inside of the concrete
6 girders, there is no evidence that would indicate frequent sustained use of the bridge. The project
7 would be designed to avoid impacts to the girders and cavities within the segmental bridge
8 superstructure. Although suitable habitat for the leafy prairie clover and Price's potato-bean exist
9 nearby, no known occurrences have been documented in the project area. Construction and staging
10 would avoid impacts to vegetation. Therefore, impacts to federally regulated species would not be
11 likely.

12
13 The USFWS responded in letter dated March 18, 2021, acknowledging that the determinations of "no
14 effect" made for the Indiana bat and northern long-eared bat are appropriate, and concurring with the
15 determination of "not likely to adversely affect" for the gray bat, leafy prairie clover, and Price's potato
16 bean. Copies of the USFWS consultation letters are included in Appendix A.

17 18 *National Historic Preservation Act of 1966 Coordination and Consultations*

19
20 Section 106 of the NHPA requires federal agencies to consider the effects on historic properties of
21 projects they carry out, assist, fund, permit, license, or approve. The NPS initiated NHPA Section 106
22 consultation with the SHPO in a letter dated February 10, 2021. The NPS determined the bridge to be a
23 contributing resource to the Parkway historic property, and also individually eligible for listing on the
24 NRHP under National Register Criterion C in that it embodies "distinctive characteristics of a type,
25 period, or method of construction...", and under Criteria Consideration G as "a property achieving
26 significance within the past 50 years if it is of exceptional importance." The NPS also determined that
27 the proposed undertaking would result in an adverse effect to the historic structure and the Parkway's
28 cultural landscape.

29
30 In a letter dated February 11, 2021, the SHPO concurred that the project would adversely affect the
31 Tennessee Highway 96 Double Arch Bridge as it is contributing to the Parkway. The SHPO clarified on
32 September 13, 2021, that installation of a temporary debris shield would not result in an adverse effect
33 to historic properties. The SHPO agreed to participate in the development of a MOA to resolve the
34 adverse effects.

35
36 On March 11, 2021, NPS notified the Advisory Council on Historic Preservation (ACHP) about the
37 potential adverse effect in accordance with 36 CFR § 800.6. The notification included descriptions of the
38 undertaking and invited ACHP to participate in the resolution of adverse effects during development of
39 the MOA. ACHP responded to the notification on March 25, 2021 and declined to participate in the
40 consultation to resolve adverse effects.

41
42 NPS contacted twenty-one Federally recognized tribes to initiate Section 106 consultation on February
43 10, 2021. The letters notified the tribes about the undertaking and potential adverse effect on the
44 historic Parkway, and that there would be no adverse effect on archaeological resources. Responses
45 were received in support of the project from the Kialegee Tribal Town and the Choctaw Nation. Neither
46 tribe requested to participate in the Section 106 process as a consulting party. No response was
47 received from the following nineteen tribes: Absentee-Shawnee Tribe; Alabama-Coushatta Tribe of
48 Texas; Alabama-Quassarte Tribal Town; Cherokee Nation; Chickasaw Nation; Chitimacha Tribe of

1 Louisiana; Eastern Band of Cherokee Indians; Eastern Shawnee Tribe of Oklahoma; Jena Band of
2 Choctaw Indians; Miccosukee Tribe of Indians of Florida; Mississippi Band of Choctaw Indians; Muscogee
3 (Creek) Nation; Poarch Band of Creek Indians; Seminole Nation of Oklahoma; Seminole Tribe of Florida;
4 Shawnee Tribe; Thlopthlocco Tribal Town; Tunica-Biloxi Tribe of Louisiana; and the United Keetoowah
5 Band of Cherokee.

6
7 On February 17, 2022, a MOA was signed by NPS, FHWA and the SHPO in accordance with NHPA Section
8 106 (see **Appendix B**). The MOA contains stipulations to resolve the adverse impacts to the historic
9 bridge and Parkway landscape. Per Stipulation I of the MOA, the bridge was documented by a
10 professional meeting the Secretary of Interior's Professional Qualification Standards (36 CFR 61,
11 Appendix A) prior to installation of the PSDS. Documentation was prepared in accordance with the
12 requirements set forth in 68 FR 43159 and the Secretary of the Interior's Standards and Guidelines for
13 Architectural and Engineering Documentation Requirements. The documentation was accepted by the
14 NPS Historic American Engineering Record (HAER) on February 22, 2022 (HAER 2022). The MOA also
15 includes stipulations for the treatment of unanticipated discoveries during construction.
16

LIST OF PREPARERS AND REVIEWERS

The following individuals contributed to the development of this document:

Federal Highway Administration

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Douglas Neighbor, Superintendent

Deanna Boensch, Natural Resource Specialist

Christina Smith, Chief of Resource Management

Greg Smith, Chief of Maintenance

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Kevin Tyler, Denver Service Center

CHAPTER 5: REFERENCES

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APPENDIX A: Agency Coordination Letters



U.S. Department
of Transportation
**Federal Highway
Administration**

Eastern Federal Lands
Highway Division

22001 Loudoun County Parkway
Building E-2, Suite 200
Ashburn, VA 20147

SENT VIA ELECTRONIC CORRESPONDENCE

In Reply Refer to: HFPP-15

Mr. Lee Andrews
Field Supervisor
U.S. Fish and Wildlife Service
446 Neal Street
Cookeville, TN 38501

Subject: NP-NATR 5570-463P
Natchez Trace Parkway Bridge
Williamson County, Tennessee
Request for Section 7 Concurrence

Dear Mr. Andrews:

The Eastern Federal Lands Highway Division of the Federal Highway Administration (FHWA), and the National Park Service (NPS), are planning a project that would make safety improvements to the TN Highway 96 Double Arch Bridge (bridge). The bridge has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives include vertical posts with angled returns supporting woven stainless-steel wire mesh, arch posts supporting rigid woven stainless-steel mesh, and vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. Conceptual renderings of the three PSDS alternatives are provided as attachments.

The Information for Planning and Consultation (IPaC) system was used to obtain an official species list (Consultation Code: 04ET1000-2021-SLI-0366). The list contained the following species:

- Gray Bat, *Myotis grisescens* (Endangered)
- Indiana Bat, *Myotis sodalis* (Endangered)
- Northern Long-eared Bat, *Myotis septentrionalis* (Threatened)
- Leafy Prairie-clover, *Dalea foliosa* (Endangered)
- Price's Potato-bean, *Apios priceana* (Threatened)

According to the Recovery Plan for the Leafy Prairie-clover (*Dalea foliosa*) (U.S Fish and Wildlife Service 1996), there is known population of leafy prairie clover in Williamson County Tennessee, identified as Sneed Road Cedar Glade (2). This population is approximately five miles from the project area. There is one site within Lee County, Mississippi along the Natchez Trace Parkway where Price's potato-bean is present within the Black Belt prairie. There are no known populations of either leafy prairie clover or Price's potato-bean in the action area. The

proposed activities would occur within the existing road approaches, bridge, and adjacent parking area; therefore, direct impacts to leafy prairie-clover and Prices potato-bean are unlikely to occur.

Although bats have been documented roosting inside of the concrete box girders, there are no large areas of urine staining or guano piles that would indicate frequent sustained use. A copy of the Bridge Inspection Report, inspection date March 28, 2019, is attached, which includes photos depicting the condition of the bridge. Photo #54 shows a bat (species undetermined) inside the bridge. The determination key was used to evaluate the potential for impacts to the northern long-eared bat and the Indiana bat, which resulted in a no effect determination for both species. A verification letter was obtained for the project, confirming that the project is consistent with the Programmatic Biological Opinion for Transportation Projects and will not result in prohibited take.

Gray bats primarily roost in caves during the winter hibernation period and while they are active in the spring, summer, and fall. Foraging typically occurs mainly along areas of open water, such as rivers and lakes. Night work may be necessary to install protective shields over TN Highway 96; however, night work to install the PSDS on the bridge is not anticipated. The PSDS would connect to the outside of the bridge, and would not impact the inside of the concrete box girders. Noise levels would increase during installation of the PSDS; however, the increased noise would be localized and of short duration. Furthermore, no tree clearing or in-water work will be needed to complete the improvements.

FHWA respectfully requests your review of the three PSDS alternatives. If you determine that any additional Federally-listed species may be present or affected by the proposed project, please provide any restrictions or mitigation requirements that should be included to ensure that this project does not adversely affect any Federally-listed threatened or endangered species. If you require any additional information, or have any questions, please contact Ms. Lisa Landers, Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**Kevin
S Rose** Digitally signed
by Kevin S Rose
Date: 2021.02.17
07:53:24 -05'00'

Kevin S. Rose
Environmental Compliance Specialist

Attachments

cc:

Mr. John Griffith, Transportation Biologist, Tennessee Field Office, USFWS
Ms. Deanna Boensch, Natural Resource Specialist, Natchez Trace Parkway, NPS
Dr. Christina Smith, Chief of Resource Management, Natchez Trace Parkway, NPS



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Tennessee Ecological Services Field Office

446 Neal Street

Cookeville, Tennessee 38501

(931) 528-6481



March 18, 2021

Mr. Kevin Rose
22001 Loudoun County Parkway
Building E-2, Suite 200
Ashburn, Virginia 20147

Subject: FWS# 21-CPA-0234. Proposed State Route 96 (Natchez Trace Parkway) Double Arch Bridge safety improvements; Federal Project No: NP-NATR 5570-463P, Williamson County, Tennessee.

Dear Mr. Rose:

Thank you for your correspondence dated February 18, 2021, regarding the proposed safety improvements to the State Route 96 Double Arch Bridge in Williamson County, Tennessee. The bridge has been designated as a human health and safety hazard because of the high number of suicides at the bridge. The Eastern Federal Lands Highway Division of the Federal Highway Administration and the National Park Service are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. The three PSDS alternatives include vertical posts with angled returns supporting woven stainless-steel wire mesh, arch posts supporting rigid woven stainless-steel mesh, and vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. We have reviewed the subject proposal and offer the following comments.

You have made determinations of “no effect” for the federally listed Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) and have received a verification letter from our Information for Planning and Consultation (IPaC) system. A “no effect” determination is an appropriate determination by the action agency when the proposed action will not affect federally listed species or designated critical habitat, and completes consultation requirements under Section 7 of the Endangered Species Act of 1973 ((ESA) 87 Stat. 884; 16 U.S.C. 1531 et seq). You have also requested our concurrences on the determinations of “not likely to adversely affect” for the federally listed gray bat (*Myotis grisescens*), leafy prairie clover (*Dalea foliosa*), and Price’s potato-bean (*Apios priceana*), because activities would be confined to the existing road approaches, bridge, and adjacent parking area, and the PSDS would connect to the outside

of the bridge and be installed in a manner that would minimize potential for impacts to roosting bats from construction.

Upon review of the information provided and our database, we concur with the determinations of "not likely to adversely affect" for the gray bat, leafy prairie clover, and Price's potato-bean. We are not aware of any federally listed, proposed species, or critical habitat that would be impacted by these safety improvements. Therefore, based on the best information available at this time, we believe that your obligations have been fulfilled for all species that currently receive protection under the ESA. Obligations under section 7 of the ESA must be reconsidered if (1) new information reveals impacts of the proposed action that may affect listed species or critical habitat in a manner not previously considered, (2) the proposed action is subsequently modified to include activities which were not considered during this consultation, or (3) new species are listed or critical habitat designated that might be affected by the proposed action.

If you have any questions regarding our comments, please contact John Griffith at 931/525-4995 or by email at john_griffith@fws.gov.

Sincerely,

**DANIEL
ELBERT**

Digitally signed
by DANIEL ELBERT
Date: 2021.03.18
11:24:08 -04'00'

Daniel Elbert
Field Supervisor

xc: Casey Parker, TWRA, Jackson, TN



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



Reid J. Nelson
Acting Executive Director
Federal Property Management Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway

Dear Mr. Nelson:

The Natchez Trace Parkway (Parkway) proposes to install a permanent suicide prevention barrier on the Tennessee Highway 96 (Double Arch) bridge in Williamson County. The proposed undertaking will result in an adverse effect to the structure.

In accordance with §106 of the National Historic Preservation Act of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, the NPS respectfully requests your review. Attached is the Electronic Section 106 Documentation Submittal System (e106) Form and supporting documentation for your reference.

If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.03.11
08:03:54 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO

Honorable Governor John R. Johnson
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 S. Gordon Cooper Dr.
Shawnee, OK 74801

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Governor Johnson,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina.Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:34:02 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO:

Honorable Chairman Herbert G. Johnson, Sr.
Alabama-Coushatta Tribe of Texas
571 State Park Road 56
Livingston, TX 77351

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chairman Johnson,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:32:07 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Principal Chief Tarpie Yargee
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883-0187

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Yargee,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

Laura Perdices
Acting Superintendent

Digitally signed by LAURA
PERDICES
Date: 2021.02.10 12:32:46 -06'00'

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Principal Chief Chuck Hoskin, Jr.
Cherokee Nation
P. O. Box 948
Tahlequah, OK 74464

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Principal Chief Hoskin,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:33:23 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO

Honorable Chairman Melissa Darden
Chitimacha Tribe of Louisiana
P. O. Box 661
Charenton, LA 70523

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chairman Darden,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

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Sincerely,

**LAURA
PERDICES**

Laura Perdices
Acting Superintendent

Digitally signed by LAURA
PERDICES
Date: 2021.02.10 12:31:25
-06'00'

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Chief Gary Batton
Choctaw Nation
P. O. Drawer 1210
Durant, OK 74701

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Batton,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

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Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:30:43 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Principal Chief Richard Sneed
Eastern Band of Cherokee Indians
P. O. Box 455
Cherokee, NC 28719

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Sneed,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

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Sincerely,

**LAURA
PERDICES**

Laura Perdices
Acting Superintendent

Digitally signed by LAURA
PERDICES
Date: 2021.02.10 12:29:55
-06'00'

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO

Honorable Chief Charles Enyart
Eastern Shawnee Tribe of Oklahoma
P. O. Box 350
Seneca, MO 64865

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Enyart,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina.Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.11
13:02:16 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Tribal Chief Cheryl B. Smith
Jena Band of Choctaw Indians
P. O. Box 14
Jena, LA 71342

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Smith,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:29:17 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Town King Jeremiah Hobia
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Town King Hobia,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

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Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:28:35
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Mr. Kevin Donaldson
Environmental Specialist
Miccosukee Tribe of Indians of Florida
Tamiami Station
P.O. Box 440021
Miami, Florida 33144

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Mr. Donaldson,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

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Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
12:27:54 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO

Honorable Tribal Chief Cyrus Ben
Mississippi Band of Choctaw Indians
101 Industrial Rd
Choctaw, MS 39350

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Ben,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

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Sincerely,

**LAURA
PERDICES**

Digitally signed by
LAURA PERDICES
Date: 2021.02.10
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Principal Chief David Hill
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Principal Chief Hill,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina.Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:26:21
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Tribal Chair Stephanie A. Bryan
Poarch Band of Creek Indians
5811 Jack Springs Rd
Atmore, AL 36502

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Tribal Chair Bryan,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

The NPS has determined that the proposed undertaking would result in an adverse effect to the historic bridge; however, there would be no adverse effect to archeological resources as a result of the proposed action. In order to resolve the adverse effect to the historic bridge, a Memorandum of Agreement (MOA) will be developed and executed.

The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

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LAURA PERDICES
Date: 2021.02.10 12:25:46
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO:

Mr. E. Patrick McIntyre, Jr. Executive Director
Tennessee Historical Commission
2941 Lebanon Road
Nashville, TN 37214

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway

Dear Mr. McIntyre:

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act (NHPA) Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a physical suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a PSDS, i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches and small parking area (Birdsong Hollow Overlook parking area) adjacent to the bridge. All three alternatives would be constructed from the road and bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

The NPS determined the bridge to be a contributing resource to the Natchez Trace Parkway (Parkway) historic property, and also individually eligible for listing on the National Register of Historic Places under National Register Criteria C in that it embodies "distinctive characteristics of a type, period, or method of construction...", and under Criteria Consideration G as "a property achieving significance within the past 50 years if it is of exceptional importance." The bridge carries two 11-foot wide lanes of traffic with two 6-foot wide shoulders. The existing barrier is 32 inches in height and consists of an 18-inch high concrete parapet with a 14-inch tall aluminum single rail mounted to the top of the concrete wall.

Interior Region 2 • South Atlantic-Gulf

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All three alternatives would require connection of the PSDS to the bridge. In the first two alternatives, the PSDS would connect to the exterior face of the existing barrier with concrete anchors. The third alternative would replace the existing barrier rail with a PSDS that provides an integrated longitudinal rail. The bridge railing is a character-defining feature of the bridge design, and the addition of the PSDS would result in a modification to the historic structure.

As stated in the Foundation Document (NPS, 2014), "The Parkway was conceived and developed as a designed landscape that integrates a traditional rural, agrarian, southern landscape experience; facilitates leisurely and scenic travel; and links scenic, cultural, and natural features of interest." In the APE, features of the cultural landscape include the curvilinear road alignment, scenic overlook of Birdsong Hollow, and the bridge. Although the proposed undertaking would result in changes to the bridge, it would not affect land use or circulation patterns.

The proposed undertaking would result in an adverse effect to the historic structure. Mitigation measures have been discussed during previous meetings with your office. In order to mitigate this adverse effect, the bridge would be documented by a professional meeting the Secretary of Interior's Professional Qualification Standards (36 CFR 61, Appendix A) prior to installation of the PSDS. Documentation would be prepared in accordance with the requirements set forth in 68 FR 43159 and the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Requirements. A Memorandum of Agreement (MOA) has been drafted to document the resolution of the adverse effect and is attached for your review.

In accordance with Section 106 of NHPA of 1966, as amended, and the Advisory Council's regulations, 36 CFR Part 800, the NPS respectfully requests your review and concurrence with our determination and your review of the draft MOA within 30 days of receipt of this letter. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina.Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

Digitally signed by LAURA
PERDICES
Date: 2021.02.10 12:21:26 -06'00'

Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Principal Chief Greg Chilcoat
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Principal Chief Chilcoat,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

The area of potential effect (APE) is the bridge structure, roadway approaches, and a small parking area adjacent to the bridge. The bridge has previously been determined to be a contributing resource to the Natchez Trace Parkway historic property, and also individually eligible for listing on the National Register of Historic Places. All three alternatives would be constructed from the existing bridge, and so there would be no earth disturbing activities. Stockpiling of materials and staging would be limited to the closed section of the roadway approaches, on the bridge, and in the small parking area adjacent to the bridge. A figure depicting the APE is attached.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

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The purpose of this letter is to invite you to participate in the development of the MOA and to be a signatory to the MOA as a consulting party. Consulting parties have certain rights and obligations under the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800.

Please provide us with your response within thirty (30) days. If you do not respond within this time frame, you may request consulting party status in the future; however, the project may advance without your input and you won't have an opportunity to comment on the current steps. If you accept consulting party status, we ask that you nominate one representative to participate on behalf of the group. If you have any questions, please contact our Resource Management Chief Christina Smith at Christina_Smith@nps.gov or (662) 308-8908, or Ms. Lisa Landers, FHWA Environmental Protection Specialist, at Lisa.Landers@dot.gov or (571) 434-1592.

Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:17:34
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO

Honorable Chairman Marcellus W. Osceola Jr.
Seminole Tribe of Florida
6300 Stirling Rd
Hollywood, FL 33024

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chairman Osceola,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
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Date: 2021.02.10 12:19:30
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Chief Ron Sparkman
Shawnee Tribe, Oklahoma
P. O. Box 189
Miami, OK 74355

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Ron Sparkman,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

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LAURA PERDICES
Date: 2021.02.10
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO

Honorable Governor Bill Anoatubby
The Chickasaw Nation
P. O. Box 1548
Ada, OK 74820

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Governor Anoatubby,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:25:03
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO:

Honorable Town King Ryan Morrow
Thlopthlocco Tribal Town
P.O. Box 188
Okemah, OK 74859

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Town King Morrow,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:38:20
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior

NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804



IN REPLY REFER TO:

Honorable Chairman Marshall Pierite
Tunica-Biloxi Tribe of Louisiana
P.O. Box 1589
Marksville, LA 71351

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Chairman Pierite,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

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Date: 2021.02.10 12:38:54
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Laura Perdices
Acting Superintendent

Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



United States Department of the Interior



NATIONAL PARK SERVICE

Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

IN REPLY REFER TO:

Honorable Chief Joe Bunch
United Keetoowah Band of Cherokee Indians
P. O. Box 746
Tahlequah, OK 74464

Subject: NP-NATR 5570-463P
TN Highway 96 Double Arch Bridge Safety Improvements
Natchez Trace Parkway
Section 106 Consultation

Dear Honorable Chief Bunch,

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA), are initiating National Historic Preservation Act Section 106 consultation as part of pre-National Environmental Policy Act (NEPA) planning prior to the preparation of an Environmental Assessment for the subject project. The TN Highway 96 Double Arch Bridge (bridge) has been designated a human health and safety hazard because of the high number of suicides at the bridge. The NPS and FHWA are currently working to develop and design a permanent suicide deterrent system (PSDS) for the bridge to prevent future deaths. Potential alternatives have been screened and narrowed down to three alternatives that will be carried forward for detailed evaluation. The three PSDS alternatives are: vertical posts with angled returns supporting woven stainless-steel wire mesh; arch posts supporting rigid woven stainless-steel mesh; and, vertical posts with longitudinal rail supporting woven stainless-steel wire mesh. The proposed undertaking is defined as the installation of a permanent suicide deterrent system; i.e. one of the afore-listed systems.

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Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
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Sincerely,

**LAURA
PERDICES**

Laura Perdices
Acting Superintendent

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Enclosures

cc:

Ms. Lisa Landers, Environmental Specialist, FHWA-EFLHD
Mr. Dan Weston, Project Manager, FHWA-EFLHD

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands



TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 532-1550
www.tnhistoricalcommission.org

February 11, 2021

Ms. Laura Perdices
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

RE: NPS / National Park Service, Natchez Trace Parkway, TN Highway 96 Double Arch Bridge Safety Improvements, Williamson County, TN

Dear Ms. Perdices:

In response to your request, we have reviewed the documents submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Considering available information, we concur that the project as currently proposed will adversely affect the Tennessee Highway 96 Double Arch Bridge as it is contributing to the Natchez Trace Parkway. Our office will review the draft Memorandum of Agreement you submitted with the project and get back to you with edits and comments on the document as soon as we are able.

Please direct questions and comments to Casey Lee (615 253-3163). We appreciate your cooperation.

Sincerely,

cjl

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/cjl



TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 632-1550
www.tnhistoricalcommission.org

September 13, 2021

Superintendent Laura Perdices
National Park Service, Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, MS 38804

RE: NPS / National Park Service, Natchez Trace Parkway, TN Highway 96 Double Arch Bridge
Safety Improvements, Temporary Debris Shield, Williamson County, TN

Dear Superintendent Perdices:

Pursuant to your request, this office has reviewed documentation concerning the addition of a temporary debris shield as part of the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Based on the information provided, we concur that the temporary installation of the debris shield as currently proposed will not adversely affect the Double Arch Bridge, a contributing structure to the National Register listed Natchez Trace Parkway.

If project plans are changed or previously unevaluated archaeological resources are discovered during project construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. Questions and comments may be directed to Jennifer M. Barnett (615) 687-4780, Jennifer.Barnett@tn.gov. We appreciate your cooperation.

Sincerely,

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/jmb

**[EXTERNAL] Request for Consultation TN Hwy 96 (Double Arch) Bridge, Williamson County, Natchez Trace Parkway,
National Park Service**

Madison D. Currie <mcurrie@choctawnation.com>

Wed 3/10/2021 2:18 PM

To: Smith, Christina <Christina_Smith@nps.gov>

Cc: lbilyeu <lbilyeu@choctawnation.com>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Halito Dr. Smith,

The Choctaw Nation of Oklahoma thanks you for the correspondence regarding the above referenced project. Williamson County, Tennessee lies outside of our area of historic interest. The Choctaw Nation Historic Preservation Department respectfully defers to the other Tribes that have been contacted.

If you have any questions, please contact me.

Yakoke,

Maddie Danielle Currie
Section 106 Reviewer
Historic Preservation Department
Choctaw Nation of Oklahoma
P.O. Box 1210
Durant, OK 74702
Cell: 580-740-9537





March 25, 2021

Ms. Lisa Landers
Environmental Compliance Specialist
Federal Highway Administration
Eastern Federal Lands Highway Division
21400 Ridgetop Circle
Sterling, VA 20166

Ref: *Proposed TN Highway 96 Double Arch Bridge Safety Improvements*
Natchez Trace Parkway, Williamson County, Tennessee
ACHP Project Number: 16655

Dear Ms. Landers:

On March 11, 2021, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Tennessee State Historic Preservation Office and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have questions or require our further assistance, please contact Mandy Ranslow at (202) 517-0218 or by e-mail at mranslow@achp.gov and reference the ACHP Project Number above.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

Re: [EXTERNAL] TN Hwy 96

Smith, Christina <Christina_Smith@nps.gov>

Tue 2/16/2021 8:14 PM

To: David Cook <dc13.dc4@gmail.com>

Hello,

Thank you for the response. I believe the email below will suffice.

Take care,

Chris

From: David Cook <dc13.dc4@gmail.com>

Sent: Tuesday, February 16, 2021 1:26 PM

To: Smith, Christina <Christina_Smith@nps.gov>

Subject: [EXTERNAL] TN Hwy 96

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

tGood afternoon,

I have been forwarded the message regarding this proposal from the Mekko Brian Givens. We can see no issues with regard to Kialegee Tribal Town or this project. We support all efforts to curb any potential loss of life with these efforts. If a more formal letter is needed, please feel free to let me know via this email address as the office is currently closed and I'll do my best to get you what is needed.

Thank you,

David Cook

Tribal Administrator

Kialegee Tribal Town

**MEMORANDUM OF AGREEMENT
AMONG THE
NATIONAL PARK SERVICE,
FEDERAL HIGHWAY ADMINISTRATION,
and TENNESSEE HISTORICAL COMMISSION**

**PURSUANT TO 36 CFR § 800.6
regarding the
NATCHEZ TRACE PARKWAY DOUBLE ARCH BRIDGE
WILLIAMSON COUNTY, TENNESSEE
PMIS ID # 288211
FHWA Project # NP-NATR 5570-463P**

WHEREAS, the National Park Service (NPS) and the Federal Highway Administration (FHWA) have determined that it is necessary to install a physical suicide deterrent system on the Natchez Trace Parkway (Parkway) bridge over State Route 96, known as the Double Arch Bridge, located in Williamson County, Tennessee (Undertaking); and,

WHEREAS, NPS and FHWA have designated the NPS as lead Federal agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108), as amended, and codified in its implementing regulations 36 CFR Part 800, as amended, for the Undertaking; and,

WHEREAS, NPS has defined the Undertaking's Area of Potential Effects (APE), depicted in Attachment A, in consultation with the Tennessee State Historic Preservation Officer (SHPO) and other Signatories for the Undertaking, within which properties eligible or potentially eligible for listing in the National Register of Historic Places (NRHP) were identified; and,

WHEREAS, NPS has determined and SHPO has concurred that the entire Parkway is eligible for the NRHP as a district under Criteria A based on its association with events that have made a significant contribution to the broad patterns of our history and under Criteria C since it embodies the distinctive characteristics of a type, period, or method of construction. The district is characterized by its designed landscape which includes the curvilinear roadway alignment, scenic overlooks, stone masonry, bridges, mowed areas, and maintained vistas; and,

WHEREAS, NPS has determined and SHPO has concurred, the Double Arch Bridge is a contributing resource to the NRHP-eligible Parkway, and also individually eligible for listing on the NRHP under National Register Criteria C in that it embodies "distinctive characteristics of a type, period, or method of construction...", and under Criteria Consideration G as "a property achieving significance within the past 50 years if it is of exceptional importance"; and,

WHEREAS, NPS has determined and SHPO has concurred, that no archaeological sites have been identified in the APE, and project disturbances would be limited to the previously disturbed roadway prism; and,

WHEREAS, NPS has determined and the SHPO has concurred, that the Undertaking will result in an adverse effect on the Parkway's designed historic landscape and the Double Arch Bridge; and,

WHEREAS, in accordance with the regulations at 36 CFR Part 800.6(c)(1-3), the NPS, FHWA, and SHPO participated in the development of this MOA and are Signatories; and,

WHEREAS, NPS invited the Absentee-Shawnee Tribe of Indians of Oklahoma, Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Cherokee Nation, Chickasaw Nation, Chitimacha Tribe of Louisiana, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Kialegee Tribal Town, Mississippi Band of Choctaw Indians, Miccosukee Tribe of Indians, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Shawnee Tribe, Thlopthlocco Tribal Town, United Keetoowah Band of Cherokee Indians, to participate in the NHPA Section 106 process, to which no request to participate in the Section 106 process as a consulting party was provided; and,

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), NPS has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii).

NOW THEREFORE, the NPS, FHWA, and SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties.

STIPULATIONS

The NPS and FHWA shall ensure that the following measures are carried out:

I. Mitigation Measures

A. Archival Documentation

1. Prior to any construction activities, the FHWA will ensure that the resource is documented in accordance with the standards and guidelines of the Historic American Engineer Record (HAER) (www.nps.gov/hdp/standards/index.htm).
2. All documentation activities will be performed or directly supervised by architects, historians, photographers, and/or other professionals meeting

the Secretary of Interior's Professional Qualification Standards (36 CFR 61, Appendix A).

3. The FHWA will prepare and submit HAER documentation in accordance with requirements in the Secretary of the Interior's Guidelines for Architectural and Engineering Documentation (Federal Register, Vol. 68, No. 139, pp. 43159-43162, July 21, 2003). Once completed and accepted, the documentation will be placed in the Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey Collection at the Library of Congress where it will be available to the public.
4. The SHPO will receive a copy of the documentation for their files within 45 days of acceptance by NPS.
5. Documentation will include, but is not limited to:
 - a. The overall written historical and descriptive data prepared in accordance with outline format guidelines containing:
 - i. An overall general history of the Natchez Trace Bridge and its relation to the Parkway
 - ii. History of the Natchez Trace Bridge design including the history of the engineering features
 - iii. An architectural description of the bridge including alterations from the original construction
 - iv. A description of the site including any changes to the landscape
 - v. Historical photographs and drawings in the supplementary materials section (on file at the Parkway curatorial building in Tupelo, Mississippi)
 - vi. Digital color photographic views not only of the bridge but also of the site and setting, including looking at the bridge, driving on the bridge, and from the lookout point(s) to the bridge.
 - vii. A site plan
 - b. Large-format (4" x 5" or larger negative size) photographs processed for archival permanence in accordance with HAER photographic specifications (www.nps.gov/hdp/standards/photoguidelines.pdf). Views will include but are not limited to:
 - i. At least one view placing the bridge in context.
 - ii. General views of all sides.
 - iii. Detail views of the arches, piers, guard walls, parapets, deck, bearings, thrust blocks, arch spring points, and other distinctive features of the precast segmental structure.

- iv. If accessible, the traffic deck support system (such as floor beams and stringers viewed from underneath the bridge).
 - v. Abutments and approach details.
 - vi. One photograph of each viewpoint looking at the bridge.
 - vii. At least one view looking from the bridge that captures driving on the bridge in context to its surroundings.
 - viii. Photo locations keyed to the site plan and included with the “Index to Photographs.”
- B. If previously unknown cultural resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted and the SHPO and Tribal Historic Preservation Officers (THPOs) shall be notified immediately. Work shall not resume until the NPS determines the resources have been identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with pertinent laws and regulations.
- C. To the best of the Signatories’ knowledge and belief, no human remains, associated or unassociated funerary objects or sacred objects, or objects of cultural patrimony as defined in Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001) are expected to be encountered. However, should human remains be encountered, work will immediately stop in the vicinity of the discovery, the area will be secured, and the FHWA will immediately notify the NPS, the Williamson County Sheriff’s Office, the Williamson County Coroner’s Office and the SHPO. If the human remains are determined to be Native American, the NPS will be responsible for compliance with the provisions of NAGPRA.

II. DISPUTE RESOLUTION

Should any signatory to this MOA object within 30 calendar days to actions or plans for review pursuant to this MOA or dispute the completion of the terms of this agreement, NPS shall consult with the objecting party to resolve the objections. If NPS determines that the objection cannot be resolved, NPS shall forward all documentation relevant to the objection to the ACHP and request the ACHP’s comments pursuant to 36 CFR 800.2(b)(2).

ACHP comments provided in response to such a request shall be taken into account by the NPS before NPS reaches a final decision on the dispute. If the ACHP does not provide comments regarding the dispute within 30 calendar days after receipt of a request for assistance pursuant to 36 CFR 800.2(b)(2), NPS may implement its proposed resolution or render a decision regarding the dispute.

III. AMENDMENT

Any Signatory to this agreement may request that the other Signatories consider amending it if circumstances change over time and warrant revision of the stipulations. Except in the case of amendments addressing resolution of disputes pursuant to Section V of this MOA, amendments shall be executed in writing and shall be signed by all Signatories in the same manner as the original MOA.

IV. TERMINATION

Any Signatory to this MOA may initiate termination by providing written notice to the other Signatories of their intent. After notification by the initiating Signatory, the remaining Signatories shall have 90 business days to consult to seek agreement on amendments or any other actions that would address the issues and avoid termination. In the event of termination, the NPS shall refer to 36 CFR Part 800 to address any remaining adverse effects to the sites.

V. DURATION

This MOA shall expire if its terms are not carried out within seven years from the date of its execution, unless the Signatories agree in writing to an extension for carrying out its terms. The NPS shall ensure the MOA will be re-evaluated and amended, to accommodate any changes to the terms. All Signatories will be consulted during the amendment process.

Execution of this MOA and implementation of its terms evidence that NPS has taken into account the effects of the undertaking on historic properties.

Signatures. In witness whereof, the Parties to this MOA through their duly authorized representatives have executed this MOA on the dates set out below, and certify that they have read, understood, and agreed to the terms and conditions of this MOA as set forth herein.

The effective date of this MOA is the date of the last Signatory signature affixed to these pages.

SIGNATORIES:

NATIONAL PARK SERVICE – NATCHEZ TRACE PARKWAY

By: DOUGLAS NEIGHBOR Digitally signed by DOUGLAS NEIGHBOR
Date: 2022.02.08 16:14:37 -06'00' Date 02/08/2022
Douglas S. Neighbor, Superintendent

**U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL HIGHWAY
ADMINISTRATION, EASTERN FEDERAL LANDS HIGHWAY DIVISION**

By: KURT A DOWDEN Digitally signed by KURT A DOWDEN
Date: 2022.02.15 10:49:59 -05'00' Date _____
Kurt A. Dowden, Chief of Business Operations

TENNESSEE HISTORICAL COMMISSION

By: E. Patrick McIntyre, Jr. Date 2/17/2022
E. Patrick McIntyre, Jr., State Historic Preservation Officer

ATTACHMENT A

NP-NATR 5570-463P

Area of Potential Effect (APE)

Physical APE



Visual APE



1000 ft

Google Earth

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