



March 9, 2010

Tennessee Department of Transportation, Project Comments
505 Deaderick Street, Suite 700, James K. Polk Building
Nashville, TN 37243-0332

RE: Corridor K Comments, Public Meeting February 16 and 17, 2010

Dear TDOT:

On behalf of the Southern Appalachian Forest Coalition (SAFC) and its member groups, we submit these comments in response to TDOT preparation of a Transportation Planning Report (TPR).

The Southern Appalachian Forest Coalition and its member groups have a strong interest in the public lands of Tennessee and the Southern Appalachians and in devising sound and sustainable transportation options that solve legitimate transportation needs while minimizing the impact on our fragile and scarce public lands.

We appreciate the efforts that TDOT has made in considering all options during this TPR process and particularly considering improvements along the current alignment. We urge TDOT to keep this option under full consideration during all phases of the process, especially during the NEPA process. This alternative is the only alternative that has acceptable impacts to public land resources. This alternative along the existing alignment has issues and difficulties. However, all

of the alternatives have issues and difficulties. Unfortunately, it seems that the issues and difficulties along the existing route have been emphasized during recent phases of the process. This is no doubt due to the rock slide this winter and the difficulties in reopening the road. However, this current situation should not be allowed to cloud the fair consideration of the current alignment with the alternative routes.

It may be somewhat understandable that the known issues of the current route are being contrasted to an idealized idea of alternate routes, at least in the mind of some of the public and in the media. The current route is in place, does have known issues, and does experience some problems like the current rock slide damage. Other routes can become idealized for many because the issues are not fully known or documented. The issues that would inevitably arise with any of the alternative routes have not been fully documented and to a great extent are not known. Indeed the issues of construction and maintenance can be assessed and predicted but cannot be fully known. It is incumbent on TDOT as they continue this process to fully document the known environmental impacts of the various routes. It is also essential to document the many uncertainties and unknowns. Because there is a road in the current alignment that manifests existing issues should not lead TDOT to pick an alternative where many of the issues will not be fully known.

We would like to see additional creative energy go into possible solutions along the existing alignment that make an alternative on the existing route more acceptable. We reject the idea that there are only two options (2 and 2A) along the existing route. These alternatives appear to address limited spot improvements versus an alternative fully compliant with ARC design requirements. We feel that a better alternative is to comprehensively address the real transportation needs of the area and design an alternative along the existing alignment that addresses these needs while minimizing environmental impacts.

ARC funds should be placed in proper perspective and should not be the major factor in determining what alternatives should be considered and what designs are used to address the real transportation needs for this project. And if ARC is serious about addressing the real needs of the region and this portion of the region, they should consider funding innovative solutions and designs. The ARC transportation network was conceived in the 1960s. Many of the concepts and design constraints still in place do not fit well with 21st century conditions and needs. In particular, almost a half century of road building in the region has changed the landscape from one of poor transportation access to one where many transportation options are available. While bringing many benefits, this transportation development has gobbled up open space and wildlife habitat until these resources are in incredibly short supply. All of the alternatives being considered in the current study except along the existing alignment would further carve away this irreplaceable resource. We call on both TDOT and ARC to show flexibility, creativity, and

innovation in devising and funding a solution that makes use of the current alignment. The current alignment, already heavily impacted by human infrastructure, should be utilized rather than sacrificing additional open space and habitat and impacting high quality streams.

Information in recent handouts and meeting discussions has alluded to “substantial road closure and detours possible over a 4-8 year construction period” if option 2 is chosen. In the context of the current rock slide closure, this information has exacerbated the anxiety in local communities and has cast the new alternatives being studied in the role of creating a solution that wouldn’t have the problems of the existing route. A false dichotomy is being created that suggests that alternatives to the existing alignment will solve all transportation problems. However, the rock slide is a relatively short term issue that will be over many years before any of the alternative routes are completed. Rock slides occur in mountainous terrain and nothing can assure that these problems will not occur on any route and on multiple routes.

Creativity is needed in addressing the options for construction and the long term need for alternate routes. TDOT should be well equipped to design creative solutions that would minimize road closures and provide additional options. Some possibilities:

- Bring alternate existing routes going north to Madison County and south into Georgia into better shape to handle traffic when needed. Use the period between the current repairs of US 64 and the ultimate US 64 upgrades to make these improvements on existing alternate routes while U.S. 64 is open. An alternative as fast or faster than the existing US 64 is not called for. Existing routes exist that could allow reasonable delays if improved. Hundreds of thousands of people are dealing with major delays as the I-40 rock slide is repaired between Tennessee and North Carolina. The recent rock slide in the Glen Canyon of Colorado will cause major delays for an extended period. These types of disruptions occur in unstable geology. Our sympathy goes out to people in Polk County whose lives have been disrupted during this period. Improving existing alternate routes that could serve as reasonable alternatives when US 64 is closed for short or extended periods is needed. An entirely new route fragmenting Cherokee National Forest and degrading pristine streams is not needed.
- After improvements are made to existing alternate routes, close the existing US 64 for the minimum period needed to address the major bottlenecks of future construction. Put in the needed resources with multiple crews addressing all the bottlenecks and pinch points in the Ocoee Gorge to increase the space for ongoing work and to create at least one lane through the gorge for ongoing traffic. During this period crews would also address the potential landslide areas to neutralize all or most of these.
- Once the route is open to traffic, concentrate construction in specific areas at any one time; where traffic has to be limited to a single lane, use portable traffic lights to control the flow of traffic.
- Time the blasting and other work that requires limiting access to all traffic to well publicized times when the road would be closed.
- Utilize innovative design and construction methods to minimize the time and disruption of traffic.

- During construction, where space allows, build river recreation and scenic pull-offs, well designed to get recreation traffic safely off and back on the main route when the route is finished.

The travel time estimates on the different options are startling. It is clear from these estimates that the most drastic options offer little travel advantage over even the existing route. The expenditure of hundreds of millions of dollars and the destruction of public lands are not worth saving a couple of minutes of travel time over the more reasonable options along the current alignment. It is clear that reasonable improvements would enable the highway to accommodate existing and expected traffic. This reasonable use should be the focus of the purpose and needs for the project. The flawed and biased ARC economic study that envisions this route being a key link for connecting the region to international trade through port access should not be used as a basis for the purpose and need of improvements to US 64. The ARC study largely ignores the fact that freight shipment is increasingly going toward rail transport. This movement to rail is entirely appropriate as rail holds many advantages over truck transport in fuel conservation, efficiency of transport, reduction of stress on existing highway transportation infrastructure, and less disruption to conservation resources than new highway construction. The TDOT and ARC should get behind this transformation of our freight infrastructure to greater reliance on rail. Planning and resources should be going toward making needed enhancements to rail transport infrastructure. Decisions on highway infrastructure should be brought into the 21st century making use of the most efficient and effective transportation options available including emerging and promising trends.

Thank you for the opportunity to submit these comments.

Sincerely,

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