



March 9, 2010

TDOT, Project Comments
505 Deaderick Street, Suite 700
James K. Polk Building
Nashville, TN 37243-0332

Re: Corridor K, Ocoee Gorge Segment Public Public Meeting February 16,17

These comments are being submitted on behalf of the more than 6,000 members of the Tennessee Chapter of the Sierra Club, who live near, recreate in, and are citizen owners of the Cherokee National Forest. We appreciate the opportunity to provide our input into the planning process for this proposed project.

Without getting bogged down in technical details as to needs, wants, and impacts, it needs to be said that the determining criteria for the Corridor K project will involve a balancing of values. These values basically boil down to the value society and the community place on the (relatively) untrammelled Southern Appalachian Mountains in the Cherokee National Forest, with the attendant scenic values, wildlife, endangered species, water quality, unbroken forest, biodiversity, air quality, traditional rural lifestyles, and tourism and recreation potential; versus the value society and the community place on incremental improvements in transportation times, assumed economic development, and safety improvements.

The Sierra Club comes down strongly on the side of the untrammelled National Forest. The initial impetus for this project was economic development in the Southern Appalachians by improving transportation linkages between Cleveland, TN and Asheville, NC. The rationale was that this would provide access to the "global marketplace". An economic study was funded by the Appalachian Regional Commission in 2008 to justify this rationale. A review of this study (appended) by an economist at Tennessee Technological University, Dr. Jon Jonakin, concluded the study was fatally flawed and designed to support a predetermined conclusion – namely that the Corridor K project was needed to support the economic development of eastern Polk County and SW North Carolina. In reality, Corridor K is intended to drive, not support, economic and business development in these areas. The Sierra Club does not agree that this is a proper role for a state transportation agency to assume, and further that it is not a valid use of taxpayer monies to subsidize private special interests.

The Sierra Club believes the impacts of a new road cut through the Southern Appalachia Mountains, with the attendant water pollution, destruction of forest lands, damage to wildlife and endangered

species far outweigh the benefits of cutting two to four minutes off the travel time between Ducktown and Benton. We believe the safety issues brought forward related to the existing alignment, while certainly legitimate, can be addressed by reengineering and rebuilding targeted points along the Ocoee Gorge, and at a cost to taxpayers far less than the estimates for construction along new alignments.

The argument is being made since the unfortunate rock slides in the gorge that an alternative route through the mountains is needed to provide for east-west access; that it is unacceptable to have eastern Polk County cut off from the rest of Tennessee for extended periods of time. This issue can be readily addressed by improving existing alignments along Hwy 68 from Ducktown to Tellico Plains, and then going west along Hwy 39 and Hwy 310 to Hwy 411. While this alternate route is 30 miles longer than Hwy 64 through the gorge, it is nowhere near as long as the publicized temporary go-around TDOT has on their signage and web site. Again, the cost to taxpayers and the environmental destruction of improving these existing alignments is far less than the cost of constructing a new highway across the mountains.

The argument is being made that "spot" improvements to Hwy 64 and improvements to existing alternate routes do not qualify for ARC funding. The cost of these improvements to TN taxpayers, even without ARC funding, is likely less than the cost to TN for constructing a new highway. And it should be borne in mind that at present no cost estimates have been publicized for mitigating and dealing with the problem of acidic rock, which is a major issue. Indeed, it strikes us as somewhat disingenuous for TDOT to publish initial cost estimates for the alternative alignments, and exclude the costs of this issue.

In summary, the Sierra Club supports US 64 Improvement Option 2a, together with improvements to the existing alignments along Hwy 68, Hwy 39, and Hwy 310 to provide for an alternate route in the event US 64 has to be closed due to the inevitable rock slides or other obstruction.

Sincerely,

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Comments on: **Corridor K Economic Development and Transportation Study: Final Report**

Much of the data reported appear to relate to the entire **inter**-regional area through which the proposed road will pass, rather than to those **intra**-regional areas [and businesses] that might more reasonably be expected to benefit from Corridor K [CK]. Many, probably most, businesses in the broader region might never expect to benefit from the road since they are already close to other existing and sufficient roads.

An example of this diffuse, non-focused data is the "Corporate Site Location Survey" cited on page 33. Much of the data reported and that note the importance of transportation costs, transport difficulties, etc. faced by businesses never actually link the respondents in question with the potential benefits of CK. We are told that the data rank "highway accessibility" as a major factor in site selection, but this would be true of most, if not all, businesses anywhere.

Also in this vein is Table A [introduced on p.39 and reported on pp.40,41]. Table A purports to show "opportunities" for jobs if "transportation barriers were removed." How were the numbers derived? What is the difference between 'potential attraction' and 'new opportunities'? What are the overall projected numbers of new jobs? And: What portion of the apparently scores of thousands of jobs reported in Table A would result from CK? We are not told.

In the Executive Summary on p. 2 [and also on pp.61-63] we are told--as THE major positive finding--that 7,000 jobs over 5 years might result from "an improved east-west highway **such as** CK". The study was not done by the contracted group [Wilbur Smith Associates] but by ERP/LEAP [?] and considered only the general concept of an east-west road, and **not** the site-specific impact of CK. Importantly, the overall consequence for job creation is a tiny, even minuscule, number of jobs in relative and absolute terms. Indeed, the report concedes as much: "Though the gains above may seem small when compared to the total number of existing jobs in the region..." [p62].

Also, having made much of the importance of manufacturing as a desirable sector, it is admitted that very few of the potential jobs would be in manufacturing...p.39...while most would be in the ubiquitous service sector, which would presumably rely less on transportation, tourism excluded.

More problematic for me is the Existing Business Transportation Survey [p.36 & see pp.135-39 for actual survey] that was directed toward regional businesses "in the region" [p.36]. I was unable to determine who designed the survey...but it appears that this might be the only piece of **primary data collection** done by Wilbur Smith Associates. The survey reports that 82% of the 114 businesses surveyed "said that a highway connecting SE TN and SW NC would benefit their business" [p.38] by lowering transport costs, etc. **Was this a random survey?** It appears that it was not. On the website page [p135] that introduced the survey to potential respondents one reads the following: "...the Chamber of Commerce in your community was asked to identify businesses in their area that may use the existing roadway...or...that might benefit from access to improved east-west roadway connections." Not only is this not a random survey of businesses, it more closely resembles intentional manipulation since those respondents sought were precisely those whom CK would benefit. Indeed, the surprising outcome is that an even higher proportion of 'sampled' businesses did not report benefits from such a road! On the basis of this nonrandom survey, one could establish serious doubt regarding the representativeness of much of the other data from the survey, **especially if extrapolations were made** from these respondents to determine aggregate [quantitative] benefits or to assert other aggregate [qualitative] benefits in a narrative form. In this case, large over-estimations of benefits could clearly be expected.

Especially devoid of useful content for decision making is Section VI [CK Economic Development Strategic Plan pp84-90] which might be expected to provide some methodology and numbers. Instead it is a vapid mishmash of 'vision statement', 'core values', and generalized 'goals and action strategies' which have nothing to do with a concrete assessment of CK.

I would suggest reading the document in a way that highlights the **utter lack** of relevance of much of the data for determining the impact of Corridor K on jobs, transportation costs, etc.;

Also--and in light of the small number of jobs projected [7,000]--I would make much of the **opportunity costs** of the use of the funds for CK; that is, the same funds could be used to upgrade **existing** roads, rather than to open new roads or roads with obviously limited multiplier effects such as CK. Using funds for CK would have potentially very HIGH opportunity costs, implying that their use for other road projects would be the more socially beneficial investment.

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