



1074 Arbor Drive • Lakemont GA 30552 • P: 706.508.3711 • info@waysouth.org

Preserving community, protecting the land — working for a responsible Corridor K and to stop Interstate 3

March 10, 2010

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

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

Ladies and Gentlemen:

WaysSouth is pleased to submit these comments regarding the proposed Corridor K project in Polk County. WaysSouth is a grassroots nonprofit organization working to promote responsible transportation practices that preserve the unique heritage and environment of Southern Appalachia. With more than forty organizations working with us, we represent over 1.2 million citizens, many of whom live, work, and recreate in Southeastern Tennessee and the surrounding region.

Purpose and Need

As an initial matter, we are somewhat confused as to the purpose of the proposed improvements. Some TDOT materials indicate that the goal is to improve connectivity and access in the region, while others seem to indicate that it is to create a national trucking route. These goals are largely at cross-purposes, and require very different facilities. We believe that national trucking operations are already adequately served by existing major highways in the region, and any improvements to Corridor K should focus on regional needs. The final purpose and need statement for the project should reflect this.

In addition, TDOT's materials indicate that none of the two-lane alternatives under consideration saves more than 4 minutes over the existing route, and none of the four-lane alternatives (which we strongly oppose, as set forth below) saves more than 6 minutes. Therefore, travel time savings is not a legitimate purpose or need for the project.

Alternatives

Preferred Alternative

We believe the Corridor K improvement process must respect the unique environment, geography, and natural and cultural heritage of Southeastern Tennessee, as well as the fiscal constraints

that are a reality of life today, while also meeting the legitimate transportation needs of local residents and businesses and the tourism industry that sustains the region. Keeping these sometimes conflicting goals in mind, our preferred alternative is one that improves existing U.S. Highway 64 as necessary to meet the transportation needs of the region. Presumably, this most closely approximates Option 2a, “Spot Improvements on Existing U.S. 64,” but in the absence of any detail, it is impossible to know whether Option 2a as envisioned by TDOT would in fact meet the region’s needs. (For convenience, we will continue to refer to Option 2a in this letter, while recognizing that any such option proposed by TDOT may require refinement.) In addition, we believe the improvements to U.S. 64 must be complemented by improvements to other existing roads, as discussed in the next section.

Improvement of existing U.S. 64 is clearly the least environmentally damaging alternative. It almost certainly will create the least exposure of pyritic rock, and it will not require new impacts to pristine streams and National Forest lands, as the other options will.

It is also the least expensive alternative. Estimated costs for Option 2a range from \$100 million to \$1.2 billion less than the other alternatives proposed. When the costs of managing pyritic rock, which will almost certainly be substantially less for Option 2a than for any other alternatives, are added in, the cost advantage becomes even greater.

And, by providing a safe, efficient route from eastern Polk County to western Polk County and points west, this alternative meets the legitimate transportation needs of the region as well as or better than any other alternative.

Existing Alternative Routes

Part of the justification for the proposed project is to provide alternatives to the existing route. Thus, those who support building on new location assert that it is necessary to provide a second route as a “backup” for times, such as the present, when one road is closed by rockslide or other factors.

If, as proponents of building on new location assert, the final Corridor K solution should include two routes—U.S. 64 plus some alternative route—then it is incumbent on TDOT to consider whether the same purpose and need can be met by existing U.S. 64 plus existing alternative routes.

We believe that this purpose and need can in fact be met by spot improvements to U.S. 64, combined with modest improvements to existing alternative routes, including but not limited to the State Road 39-310 corridor and routes in North Georgia. (There may also be other existing corridors that are suitable as alternatives.) One or more such combinations should be officially added to the proposed alternatives considered in the TPR and in the upcoming NEPA process, and we would be happy to meet with TDOT to discuss this concept in greater detail.

ARC Funding

There appears to be a belief that Option 2a will not be eligible for Appalachian Regional Commission (ARC) funding. We question that assumption. We are unaware of any law requiring ARC funding to be used only on new roads, not on improvements. If there is such a requirement, please specify where it is and whether the requirement can be changed. If it is ARC policy not to allow funding

to be used for improving existing roads, that policy should be changed; it is simply nonsensical in these fiscally-constrained times to refuse to fund less expensive solutions because of an antiquated notion that newer and bigger roads are always better.

Moreover, even if ARC money is not available for Option 2a, it may still be less expensive for the state of Tennessee than other options. ARC will cover only 80% of the cost of building a project; the rest must be provided by the state. Using figures provided by TDOT, which do not include costs for management of pyritic rock, Tennessee's 20% share of the project would range from \$60 million to \$257 million, with most options falling between about \$75 and \$135 million. When the costs of addressing pyritic rock (which should be substantially less for Option 2a than for any other alternatives) and ongoing maintenance of two roads are considered, Option 2a's \$200 million price tag compares very favorably with the other options, even with ARC contribution eliminated.

Other Alternatives

Beyond Option 2a, we do not believe we currently have enough information to rank the remaining alternatives. We can, however, make a few general observations:

First, those who support building on new location claim that it is necessary to provide an alternative to U.S. 64 in the event of closures such as the current one. This argument is unconvincing for several reasons:

- It would be highly unusual to spend the vast amounts necessary to build a new road simply to provide a parallel, "backup" route. That money could and should be better used elsewhere.
- Upgrades to the existing road could reduce the risk and potential severity of rockslides on the existing route, reducing or eliminating any advantages of a "backup" route.
- As discussed above, reasonable alternatives to U.S. 64 (including some that have not been promoted by TDOT) do currently exist, although they, like U.S. 64, may need improvement. We would support efforts to improve those existing alternatives.
- We think it is likely that a new road, parallel to and otherwise similar to U.S. 64, would in fact be a replacement for, rather than an alternative to, the existing road. Although TDOT asserts that it will continue to maintain U.S. 64 as well as the new highway, that is contingent on the resolve of the legislature and governor, resolve that is likely to disappear in the face of ever-shrinking budgets. Thus, we believe the new road would soon become the only road, negating the goal of a "backup" route. Loss of the existing route through the Ocoee gorge would also be devastating to the rafting industry that is a major employer in the region.

Second, under any scenario, a four-lane alternative will not serve any legitimate transportation need. TDOT's projections show that traffic volumes will not necessitate four lanes, and no design requirements mandate four lanes. No four-lane proposals should receive serious consideration, and the purpose and need statement for the project should be written to confirm that four-lane proposals will not be considered.

Third, we question the claim that U.S. 64 must be closed for several years if Option 2 is selected. We believe that using techniques such as temporary closures with concentrated pushes to eliminate “pinch points,” single lane travel segments during construction, and night and weekend work, it should be feasible to avoid long-term closures of the highway, and we encourage TDOT to think creatively about ways to reduce the length of any closure.

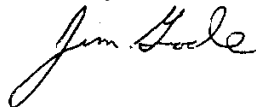
Finally, we note that any alternative on new location will have substantial impacts on the public lands, waterways, and wildlife that belong to all the people of the United States, and we caution TDOT not to minimize or dismiss those interests.

Conclusion

In sum, we believe that spot improvements to the existing U.S. Highway 64, together with a program of modest improvements to existing alternative routes, presents the best option available to TDOT for improvement of Corridor K. This alternative best preserves the qualities that make Southeastern Tennessee special, while also representing the most fiscally responsible alternative.

Thank you for the opportunity to comment on the Corridor K proposal. If you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jim Grode".

WaysSouth

by Jim Grode, Executive Director