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Public Information Meeting Comments  
Tennessee Department of Transportation  
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Re: U.S. 64 Corridor K Transportation Planning

Dear TDOT:

Please accept these comments regarding the proposed US 64 Corridor K Corridor level planning on behalf of the Southern Appalachian Forest Coalition and its member groups.

The Southern Appalachian Forest Coalition (SAFC) is an alliance of 21 grassroots, local, regional, and national conservation organizations and represents more than 50,000 citizens in the region.

We were pleased to hear it stated in the recent (July 20 and 21) public workshops that all options for US 64/Corridor K are on the table in the current process, including keeping US 64 on its current alignment and including designs for the highway other than four-lanes. We applaud the Appalachian Regional Commission and TDOT for considering non-four-lane options to “complete” Corridor K. SAFC strongly encourages TDOT to continue

looking at all options, particularly improvements to U.S. 64 that eliminate the bottlenecks and unsafe stretches of highway and adequately consider both the financial and the environmental costs.

**(1) What traffic, safety, or economic issues do you think the US 64/ Corridor K project needs to address?**

This is the crucial question. But this question has not been addressed yet in a coherent, logical, and straightforward way. There are clear needs along this section of US 64 to make the highway safe, address existing bottlenecks, and improve the highway design. Unfortunately, these legitimate issues have been conflated with other more dubious issues that confuse the options and have led corridor design in directions that not only have unacceptable environmental and fiscal impacts but also fail to address the real needs for US 64.

It is unfortunate that upgrading this section of US Highway 64 keeps getting bundled with outdated Corridor K plans. Corridor K plans were drafted during the 1960s, almost a half century ago. When Corridor K was originally envisioned in the mid-1960s to connect Asheville, North Carolina and Chattanooga, Tennessee, the I-40 and I-75 route between these 2 cities did not exist; neither did most of the region's 4-lane highways. The transportation landscape has fundamentally changed since the mid-1960s. The idea of a 4-lane highway cutting through virgin territory through important public lands is now profoundly out of date.

It is also unfortunate that the ARC Economic Development and Transportation Study is being used as a rationale and basis for the current route evaluation. This seriously flawed study should and hopefully will be critiqued by qualified economists. However, many of its errors and flaws in methodology are obvious. The study conflates data relating to inter-regional issues with intra-regional issues and uses this confused approach to conclude that Corridor K is needed to connect the region to the world market through Eastern ports. This finding ignores the fact that suitable trucking routes already exist to ports. It also ignores the fact that transportation planners (including

within ARC) are strongly predicting that freight will increasingly be transported by rail as a much more economical option, with trucking as a major freight option only at the end points of transport. The Corridor K road corridor and similar corridors were planned by The Appalachian Regional Commission (ARC) during the 1960s. These road corridors were intended to bring economic prosperity into the Appalachian region. Economic development has occurred in the region, probably thanks in part to this road corridor system. However, the economic study comes across as a propaganda piece to promote 4-laning of Corridor K and avoiding the critical re-evaluation of the ARC Corridor system that needs to occur almost a half century after these plans were put in place.

The ARC Corridors have traditionally been a 4-lane divided design. While bringing economic development, these highways have also been accompanied by uncontrolled sprawl, destruction of small communities, degradation of streams and viewsheds, destruction of wildlife habitat, and the loss or degradation of many natural areas. Meanwhile traffic bottlenecks and dangerous areas are in dire need of remedies. Sections of US 64 in the Ocoee Gorge are prime candidates for redesign that creatively address and fix the highway to provide safe and efficient transportation.

**(2) What economic, natural, cultural, recreational, community, or environmental features in the study area do you value most? Please identify resources in the area that are important to you.**

The Cherokee National Forest would be severely impacted by all of the alternatives other than the existing alignment. These are extremely important public lands including wildlife habitat, scenic views, recreation trails, pristine tributaries of the Ocoee River, and rare species. Although the initial routes have stayed out of designated wilderness areas, there would still be impacts to these wilderness areas through sights and sounds and development pressures in all of the initial routes except the current alignment. The DEIS that TDOT completed in 2003 that evaluated a 4-lane highway through this section of Corridor K documented negative impacts to over 30 threatened, endangered,

and rare species and estimated a cost of at least \$1.5 billion. The proposal was also strenuously opposed by a wide variety of groups. Governor Bredeson rightly shelved the project. There is no reason to suppose that constructing a highway through this area now will be less controversial or less costly. In fact the routes suggested south of the Ocoee are likely to be much more controversial. These routes would go through important wildlife habitat including a bear reserve and would go through an area being proposed as a wilderness addition to Big Frog Wilderness. The gorge is surrounded by steep national forest lands, and any design that places a highway through these lands will have profound environmental impacts.

**(3) Please provide comments on the Project Vision. How could this corridor benefit you and your community?**

Most of the Project Vision statement seems well thought out and attempts to balance transportation needs with minimizing adverse impacts. The US 64/Corridor K Citizens' Resource Team should be applauded for balancing the different issues that should go into addressing US 64 needs. However, the last sentence of the Project Vision is troubling: "The project should also support the current and future needs of local businesses, local and regional economic plans, and **the objectives of the Appalachian Regional Commission.**" The objectives of the ARC are not detailed in any of the project materials I saw. What exactly are these objectives? The ARC web site lists *four goals identified in the Commission's strategic plan*:

1. *Increase job opportunities and per capita income in Appalachia to reach parity with the nation.*
2. *Strengthen the capacity of the people of Appalachia to compete in the global economy.*
3. *Develop and improve Appalachia's infrastructure to make the Region economically competitive.*
4. *Build the Appalachian Development Highway System to reduce Appalachia's isolation.*

<http://www.arc.gov/index.do?nodeId=1>

These are laudable goals for the most part although one could and should argue that these goals should be balanced and placed on a par with preservation of what makes the Appalachian region special - its natural and cultural heritage. This balancing is not evident in the ARC efforts on Corridor K. Goal 4 above is also particularly troubling. As pointed out previously plans for the Appalachian Development Highway System were put in place almost half a century ago. It is not at all clear that completing the last segments of this highway system is the most pressing social or economic need of the Appalachian Region. It is past time for a re-evaluation of this highway system, weighing the impacts and downsides as well as the benefits. And in the context of what is needed for US 64 in the Ocoee Gorge it is time to question any blueprint that would result in the degradation of important natural resources in this area.

**(4) Do you have any comments on the corridors shown on the map or on the community or environmental criteria that may be used to compare corridors?**

**Are there additional criteria or corridors you would like to see considered?**

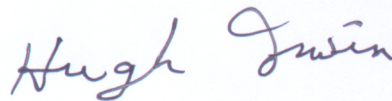
All of the corridors except the existing alignment would have unacceptable environmental, scenic and fiscal impacts. Addressing the US 64 problems on the existing corridor is the only alternative that would avoid cutting miles of new road through Cherokee National Forest through invaluable and irreplaceable natural and scenic habitat.

The Community, Economic, and Environmental Values seem well balanced. However, one has to wonder what exactly “Create New Economic Opportunities” entails. If it means addressing the real problems of US 64 with creative solutions for access to points of interest along the existing US 64 that could be broadly supported. If it means buying into the ill conceived idea articulated in the ARC Economic study of connecting truck freight traffic to the global market through a 4-lane through the Ocoee Gorge area this is quite different. As the planning for US 64 goes forward, the distinction needs to be made between real economic needs in the context of conserving a true natural heritage versus chasing an economic mirage that would ruin the natural heritage of the area.

It was stated in the recent meetings that all options are on the table in the current process, including keeping US 64 on its current alignment and including designs for the highway other than 4-lanes. We truly hope that is the case and that TDOT will creatively address the real transportation needs in the Ocoee Gorge area while protecting the invaluable natural heritage surrounding this corridor.

Thank you for considering these comments as you go forward with US 64 planning.

Sincerely,

A handwritten signature in blue ink that reads "Hugh Irwin". The signature is written in a cursive style and is centered on a light blue rectangular background.

Hugh Irwin, Program Director; Conservation Planner  
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