Citizens Against the Pellissippi Parkway Extension, Inc.

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Dear Mr. Oliver and Ms. Stack,

In anticipation of the forthcoming Final EIS on the Pellissippi Parkway Extension, we have secured an independent expert analysis of the current context of road projects in the affected area and their implications for the PPE. We are offering comments for the record. We believe a thorough and updated traffic study is necessary to reflect and account for changes since the Draft Environmental Impact Statement.

1. **The current (2040) Regional Mobility Plan materially changes the status of Projects included in the DEIS**

The DEIS (Table 2-1) identified, as part of the No-Build Alternative, a number of road improvement projects included in the 2009-2034 Knoxville Regional Mobility Plan (hereinafter "2009 RMP”).

The current RMP make substantive changes to some of these projects:

* Some of the projects in the DEIS Table 2-1 are not included in the 2040 RMP. Two

(#202 and #2O3) are eliminated entirely.

* Two other projects (#236 and #244) appear in the 2040 RMP "wish list.”
* Several of the projects in DEIS Table 2-1 have a "horizon year" in the 2040 RMP that is substantially later (typically 5-l5 years) than the year of implementation as projected in DEIS Table 2-1.
* Two projects (#257 and #258) may be revisited (and possible delayed or downsized) due

to TDOT's review of all proposed bypass projects statewide.

1. **The 2040 RMP Includes Major Projects Not Included in the DEIS List**

The 2040 RMP includes a number of projects that were not included in the DEIS Table 2- I. These projects have significance for the "need" for the PPE by (1) reducing the travel time on existing road links comprising routes that are reasonable alternatives to the PPE, (2) reducing intersection delay on routes that are reasonable alternatives to the PPE, (3) adding new road links that reduce travel time and distance on routes that are reasonable alternatives to the PPE, and (4) attracting travel away from routes that are alternatives to the PPE, thereby reducing congestion on such routes and diminishing the "need" for the PPE.

These new projects can be important in establishing the link characteristics (free-flow speed, volume/speed relationship) of a properly updated model.

1. **The Traffic Model Should Be Updated to Reflect the 2040 RMP**

The traffic model should be updated to include segments of road that will become important segments of the arterial or collector road system as a result of projects included in the 2040 RMP.

For example:

* Robert C. Jackson Drive

The extensions and upgrading projects for this route in the 2040 RMP (projects #09-202, #09-238 and #13-203) will create a continuous arterial road connecting two major state highways and serving as a parallel alternative to US 129. There should be little question of adding this entire segment of Robert C. Jackson Drive to the traffic model network. The likely consequence of adding this link is a reduction in travel time on heavily used routes such as US 129 and Lamar Alexander Parkway, with an associated decrease in "need" for the PPE.

* McCammon Avenue Extension (project #10-260) and Home Avenue Extension (project

#09-220)

The combination of these two projects creates a continuous network of major collector streets serving the retail heart of Maryville and reducing traffic and turning movements on the three surrounding arterial streets.

A detailed examination of projects adjacent to the PPE study area would most likely yield further instances of new road links warranting inclusion in an updated traffic model that divert some travel on currently congested roads within the study area, thereby further reducing the "need" for a PPE.

1. **Existing Traffic Patterns Invalidate the DEIS Traffic Model**

Beyond the above-mentioned project-related issues that call for a thorough and updated traffic study, the validity of traffic projections in the DEIS (based on pre-2007 economic data) is now questionable.

For example:

A comparison of the year 2006 traffic reported in the DEIS, the projected year 2015 traffic volumes as reported in the DEIS, and the current (year 2012) TDOT counts for six of the most important road links in Table 1-2 in the DEIS (Lamar Alexander Parkway sections 2 and 5, Hall Road sections 1 and 2, East Broadway section 3 and Pellissippi Parkway section 1) shows that:

(a) four of the links have not only failed to grow at the projected rate, but have actually decreased to below the year 2006 levels;

(b) one link shows no growth at all over the year 2006 level; and

(c) only one link has shown any growth, and at less than half the projected rate.

It is highly likely that detailed analysis of all links included in the DEIS, while requiring some

computation to correlate the DEIS link definition with the TDOT count stations, would show the

same pattern of decrease in traffic volume or non-attainment of projected traffic volumes as the six key links noted above.

Moreover, the prevailing opinion among transportation planners is that traffic levels following the 2007/8 economic slowdown are a permanent "setback" (i.e., a new starting point for future traffic growth) rather than a temporary "dip" (i.e., a short-lived decrease, from which volumes will rebound to, and continue growing from, their earlier level). This understanding of a post-2007/08 traffic growth trajectory is now being reflected in updated traffic models nationwide.

1. **The Traffic Model Should Be Updated to Reflect Current Socio-Economic ("SE") Data**

The traffic model used for the DEIS traffic projections was based on zonal (i.e., zone-by-zone)

forecasts of socio-economic data, most importantly population and employment. This data,

reflecting the experience in the greater Knoxville area over several decades before the year 2000, assumed a continuing rate of high growth in suburban tract housing, stagnant or decreasing levels of population within the inner city and outlying town centers, and new centers of retail activity and employment in suburban areas. The traffic model needs to be updated reflecting current forecasts of socio-economic data.

**Conclusion**

The travel forecast used in the DEIS for the PPE is largely invalidated by changes -- since the time

of that forecast -- in planned road improvements in the study area. These forecasts are further

invalidated by the model used in the DEIS not anticipating the major and permanent shift in

travel behavior since 2007/08.

Sincerely,

Jay Clark

President, CAPPE Board of Directors