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### Planning should begin with blank sheet of paper

By **ROBERT SHAW**

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Tennessee Department of Transportation Commissioner Gerald Nicely's community involvement intentions are good, but his implementation needs some refinement. In his Perspective article Nov. 28, he states that about one year ago his department "... began implementing a process called context sensitive solutions (CSS), a new approach to transportation project development that brings citizens and stakeholders into the design process before major decisions are made ... . A 19-member community team was formed to begin work on determining how CSS could best be applied to the project."

That is what is advertised but not what is happening. CSS is indeed one of the hottest topics in transportation planning, but it has not been applied correctly in the Knoxville Parkway case. In fact, the community team, known as the Parkway Resource Team, has only been tasked with putting some finishing touches on a specific 1,000-foot-wide corridor that was previously selected by TDOT. That is hardly involvement before major decisions are made. That is not allowing the team to decide how best to apply CSS principles to the parkway project. That is simply going through the motions.

The catch phrase for the CSS process is "thinking beyond the pavement" -- that is, a transportation solution should be in harmony with the affected communities and be consistent with the prevailing environment and land use.

One of the defining documents of the CSS concept and one fully endorsed by the Federal Highway Administration is "A Guide to Best Practices for Achieving Context Sensitive Solutions" (National Cooperative Highway Research Program, Report 480, Transportation Research Board, Washington, D.C. 2002). This 151-page document is the CSS how-to book. Throughout the text it prescribes how best to implement successful CSS processes. Our TDOT planners might want to give it a closer read.

For example, the report says that public involvement should begin early and continue throughout the planning steps: develop project concepts; conduct alternatives studies; perform preliminary engineering; prepare final design; and, finally, construct the project.

"Indeed the most effective strategy is to initially engage stakeholders prior to developing any concepts or alternatives -- to start with a blank sheet of paper." (p. 59)

"Stakeholders can and should be directly involved in the development and refinement of alternatives. Such involvement may be at the broad project level, but also on a site-specific level." (p. 62)

Other planners have weighed in on the issue of effective public involvement with similar findings. In 2002, Nicely asked the University of Tennessee Center for Transportation Research to conduct a study of 15 TDOT decisions concerning controversial state road projects. The UT group issued a lessons learned report ("Tennessee Department of Transportation 15 Project Case Study -- Lessons Learned," Stephen Richards et. al., September 2003) that, among other conclusions, suggested that early stakeholder participation be adopted: "Consider using community charette decision methods as Community Impact Assessments in determining community alternatives and building consensus. These processes are most effective when used before any specific road plans are formulated. This also calls for informing and involving the public early in the planning process."

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The report also said, "Citizens universally expressed the desire to be contacted directly and early in the process, before design and alignment alternatives are developed."

The CSS vision is clear; the UT study concurred. To achieve consensus agreement and acceptance on a transportation solution, the stakeholders must be convened before TDOT engineers draw lines on a map. Asking a group of citizens to make minor adjustments to a 300-foot wide right-of-way within a 1,000-foot corridor is not public participation in development of alternatives. When suggestions are made to broaden the scope of the evaluation, team members are told that, unless significant obstacles are found within the corridor (e.g., unforeseen environmental problems or protected historic sites), the prescribed corridor will be followed.

Why is the Knoxville region locked into such a narrow alternative? Would a bypass that is more distant from the existing urban area be more appropriate? The local transportation planning organization did indeed ask TDOT to study a regional bypass, but it did not ask for the Orange Route. What about other transportation solutions that do not involve construction of major new roads with their associated sprawl and pollution? Isn't the ozone and particulate matter in our air already out of attainment without adding a new glut of induced traffic?

The National Environmental Policy Act (NEPA) states that alternatives be devised, evaluated and documented in deliberations regarding projects that are partially federally funded. TDOT has prepared a draft Environmental impact statement that did consider three corridors -- the Blue, Green, and Orange routes. Eventually TDOT must publish a final EIS. If the final EIS will compare and contrast the three initial corridors, how do we defend the case that we have spent thousands of CSS-related dollars to fine-tune the Orange Route, while the other two received no extra attention?

Nicely has made substantial progress in requiring his state agency to listen to the public. The CSS process is new to Tennessee; let's get it right. If the process is unnecessarily constrained, the public will not accept the outcome, and we will remain stuck in the same transportation planning rut of the past.

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