

**Review of Proposed Route 475 Knoxville Beltway
Draft Environmental Impact Study (DEIS)
Executive Summary**

**Citizens Against the Beltway Orange Location (CABOL)
March 2002**

CABOL Inc. is a nonprofit advocacy group for community-based planning of economically viable transportation alternatives that significantly reduce traffic congestion in the Knoxville region while valuing the quality of life in the Heiskell, Powell, Karns, Claxton, Solway and Hardin Valley communities. CABOL has filed comments on the Beltway DEIS with the Tennessee Department of Transportation (TDOT) and the US Department of Transportation, Federal Highway Administration (FHWA). Specifically CABOL opposes any of the alternate routes discussed in the DEIS and believes that the proposed Orange and Green routes represent the least effective means of satisfying the purposes of the project with the greatest environmental impacts.

Under federal law the EIS is intended to:

- 1) Allow federal agencies to assess potential environmental impacts of a major federal action in sufficient detail to assist in determining whether and how the project will proceed.
- 2) Provide a vehicle for full and accurate public disclosure of likely environmental impacts of a proposed project thereby encouraging informed public participation in the decision-making process.

CABOL does not believe that the Beltway DEIS is adequate to meet either of these fundamental objectives of the law

Major inadequacies include:

- 1) The purpose and need for a beltway was not demonstrated or properly defined (**40 C.F.R. § 1502.13**).
- 2) The impacts of induced growth were not considered (**40 C.F.R. § 1508.8**).
- 3) Beltway alternates were not adequately evaluated (**40 C.F.R. § 1502.14 and 23 C.F.R. §771.123(c)**).
- 4) Life-cycle cost analysis was not performed (**23 U.S.C. § 106(e)**).
- 5) The proposed Orange and Green routes conflict with local growth plans (**40 C.F.R. § 1502.16**).

Additional Shortfalls:

- 1) Noise impacts were not adequately addressed.
- 2) Impact on ozone air quality standard was not considered.
- 3) Water quality and stream flooding were not adequately assessed.

Technical analysis is centered around average daily traffic (ADT) estimates of unknown origin for which there is no validation. Subsequent safety and travel time analysis based on these ADT estimates are likely in error.

Summary

CABOL strongly urges TDOT and the FWHA to go back to the drawing board on the project and the DEIS. TDOT should rethink the proposed project and if it decides to proceed, prepare a supplemental DEIS and submit for additional public review and comment before proceeding with the final EIS for the project.