



City County Building, Suite 403 • 400 Main Street • Knoxville, Tennessee 37902
(865) 215-2500 • www.knoxtrans.org

July 24, 2015

City of Knoxville, Department of Engineering
Attn: Thomas V. Clabo, P.E., Chief Civil Engineer
1400 Loraine Street
Knoxville, TN 37921

Dear Mr. Clabo:

Following are comments from the TPO Staff regarding the preliminary plans that were presented at the June 30, 2015 Public Meeting for the proposed improvements to Washington Pike between I-640 and Murphy Road:

1. The preliminary plans show a 5-lane cross section with center turn lane from the Target Shopping Center main entrance to Mill Road, which is roughly half of the entire project length. A cross section incorporating a fully non-traversable median with appropriately spaced openings would be much preferred for both increased long-term safety and operational efficiency of the entire roadway corridor. We would like to further review the necessity of a continuous center turn lane with City of Knoxville Staff and its consultants.
2. The preliminary plans indicate a terminus point of roadway construction within the intersection of Washington Pike at Murphy Road. The improvements need to be extended through the intersection in order to tie in appropriately with the section of Washington Pike extending north and east of Murphy Road. We strongly encourage coordination with Knox County Engineering & Public Works to ensure an appropriate and logical project terminus is developed.
3. The new driveway being shown off of Edmonson Lane appears to have deficient spacing from the intersection of Edmonson Lane at Washington Pike. We recommend consideration of serving these two houses from Trestle Way instead.
4. The TPO staff has already had discussions regarding some of the bicycle/pedestrian accommodations and it appears some of the recommendations have been incorporated in the latest plans. There will be a need for continued collaboration on these issues as further design process proceeds however.

Thank you very much for the opportunity to comment and time extension. Please let me know if you need clarification regarding any of the above issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Welch".

Jeffrey A. Welch
TPO Director

CC: Jim Hagerman, Director, City of Knoxville Engineering

The TPO coordinates a comprehensive, multi-modal transportation planning process for the Knoxville regional area.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015



COMMENTS:

I'm writing in support of this project. Having lived in this area for over 8 years now (4+ in Steeple Shadow and 4 in Shannon Valley Farms), my family and I have devoted many hours to sitting in afternoon traffic on Washington Pike. Additionally, we have seen many dangerous scenarios when Washington Pike floods with rainwater.

The growth in this area in the past decade has been substantial, with little to no infrastructure improvements to support it. The Legends apartments, the Harvest Park shopping and park, Shannon Valley Farms, and even the new apartments on Tazewell Pike have stretched the current Washington Pike infrastructure to its absolute capacity.

Your efforts toward this project are greatly appreciated and supported.



ADDRESS _____

E-MAIL _____

mailed to Tom Clabo, Chief Civil Engineer. (see reverse side) or e-mailed to: telaho@knoxvilletn.gov. Please send comments by July 17, 2015. If you have any questions regarding this project, please contact us at 215-6100.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT

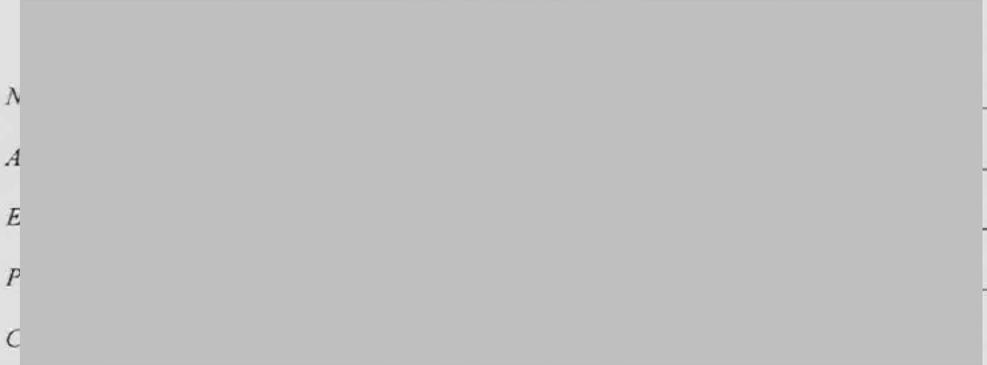
PUBLIC MEETING

June 30, 2015

COMMENTS:

I FOUND THE MEETING TO BE VERY HELPFUL AND SOMEWHAT SATISFYING. I LIVE ON WASHINGTON PIKE AND THE CHANGES THAT HAVE BEEN DONE WILL BE VERY HELPFUL TO ME AS WELL AS MY NEIGHBORS. SEVERAL OF THE CHANGES ~~AND~~ WILL SUPPORT A MORE SAFE COMMUNITY FOR US. I AM VERY EXCITED! SOME OF MY NEIGHBORS ~~AND~~ AGREED THAT WE FELT THAT WE WERE HEARD AT OUR MEETING THAT WE HAD AT OAK GROVE HOME ZION CHURCH. THE REVISED PLANS SHOWED SEVERAL OF OUR SUGGESTIONS.

THANK YOU FOR LISTENING



Comments on the proposed improvements can also be mailed to Tom Clabo, Chief Civil Engineer (see reverse side) or e-mailed to: tclabo@knoxvilletn.gov.

Please send comments by July 17, 2015.

Any questions regarding this project, please contact us at 215-6100.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015

COMMENTS:

What is cost of proposed sidewalks on both sides of Washington Pike from Murphy Rd to Greenway?

(I understand the complete street concept - but realistically - wouldn't sidewalks be better at/near schools.

Do you ever see anyone walking from target or to target - or for that matter - anyone walking anywhere on Washington Pike.

Walk from Wyrzate? Are you kidding? Walk to church??!

NO "Breakout" meetings - at rest of public meetings - everyone needs to be able to hear all conversations!



NAME _____

ADDRESS _____

E-MAIL _____

PHONE: _____

CELL _____

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Please send comments by July 17, 2015.

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WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015

COMMENTS:

So far the project looks great.
The side walks & bike lanes are something
I have been wanting since moving here.
Trees that need to clean water and
always welcome. Two way exits to the
interstate would be hugely helpful.
PIE into sky solar road
project?



NAME
ADDRESS
E-MAIL
PHONE
CELL

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Please send comments by July 17, 2015.

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WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT

PUBLIC MEETING

June 30, 2015



COMMENTS:

To Whom it may concern:
I am writing this to show my support for the Road Expansion and improvements to Washington Pike. This Road is a mess in the morning and night. And Don't mention the holidays, it is a lot worse. Please consider the improvements to this road sooner rather than later. Thank you for listening.



NAME_

ADDRE

E-MAIL

PHONE

CELL_

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WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015



COMMENTS:

I AM VERY PLEASED TO SEE THE CITY'S COMMITMENT TO COMPLETE STREETS PRINCIPLES AS A PART OF THIS PROJECT. WE ARE VERY HAPPY TO HAVE THIS PROJECT UNDER DEVELOPMENT & HOPE THAT THE FULL FUNDING LEVELS WILL RETURN SOON SO THE PROJECT MAY PROCEED.

~~THE~~ WE ARE ALSO VERY SUPPORTIVE OF THE PROPOSED ZONING OVERLAY DISTRICT TO ASSIST IN QUALITY GROWTH & CORRIDOR PRESERVATION.

THIS PROJECT WILL HELP TO EXPAND THE NON-MOTORIZED NETWORK INTO AREAS WHERE VEHICLE TRAVEL IS THE ONLY OPTION FOR SAFE TRAVEL.

PLEASE CONTINUE WORK ON THIS PROJECT & FUND ITS CONSTRUCTION.



NAME _____

666 _____

Comments on the proposed improvements can also be mailed to Tom Clabo, Chief Civil Engineer, (see reverse side) or e-mailed to: yclabo@knoxvilletn.gov.

Please send comments by July 17, 2015.

If you have any questions regarding this project, please contact us at 215-6100.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015



COMMENTS:

As a lifelong resident of Fountain City and a 10 year homeowner in Shannon Valley Farms, I believe there needs to be a great deal of work done on Washington Pike from the Target redlight all the way to Pitta Elementary. I have seen more wrecks and almost wrecks at all times of the day — morning work/school drop-off, school pick-up, and evening work return traffic overwhelm the road capacities causing road rage and frustration. In the morning I have to leave the neighborhood before 7:20am to be assured I can get an Elementary aged child a mile down Washington Pike by 7:45am. If we get a late start it becomes difficult to leave the neighborhood from the back-up of traffic trying to turn right from Murphy onto Washington Pike. Basically the lack of room on the roads has caught up with all the development in this area and become a safety concern for residents and the community. It is also becoming a concern on the other end of Murphy and Tazewell Pike, although the back-ups do not compare to the levels seen on Washington Pike.



NAME _____

ADDRESS _____

E-MAIL _____

PHONE: _____

CELL _____

Comments on the proposed improvements can also be mailed to Tom Clabo, Chief Civil Engineer, (see reverse side) or e-mailed to: tblabo@knoxvilletn.gov.
Please send comments by July 17, 2015.

If you have any questions regarding this project, please contact us at 215-6100.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT

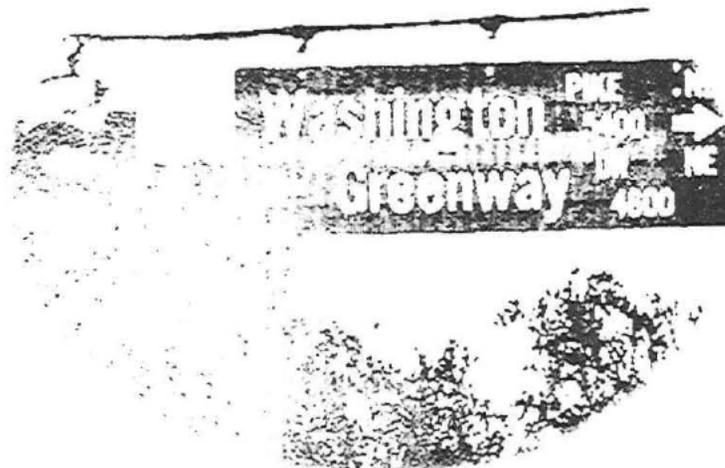
PUBLIC MEETING

June 30, 2015



COMMENTS:

THE EXPANSION OF WASHINGTON PIKE IS A MUCH NEEDED IMPROVEMENT. THE TRAFFIC IS BACKED UP ALL THE WAY TO THE INFO EXIT AND BYPASS CAUSING UNDUE CONGESTION AND PROBLEMS FOR REGISTERED VOTERS. THE SHOPPING CENTER SUFFERS, THE FARMER'S MARKET SUFFERS, AND HOME OWNERS SUFFER. THE PROJECT WOULD PUT TAX PAYER DOLLARS TO WORK IN AN AREA THAT NEEDS A FINANCIAL BOOST AND SHOULD HAVE A POSITIVE IMPACT TO BUILDERS AND HOME OWNERS OUT WASHINGTON PIKE AND SURROUNDING AREAS BECAUSE IT WILL ALLOW MORE POTENTIAL BUYERS AND BUILDERS ACCESS TO THOSE AREAS CURRENTLY RESTRICTED BY AN ANTIQUATED ROAD SYSTEM.



CELL _____

Comments on the proposed improvements can also be mailed to Tom Clabo, Chief Civil Engineer, (see reverse side) or e-mailed to: tblabo@knoxvilletn.gov.

Please send comments by July 17, 2015.

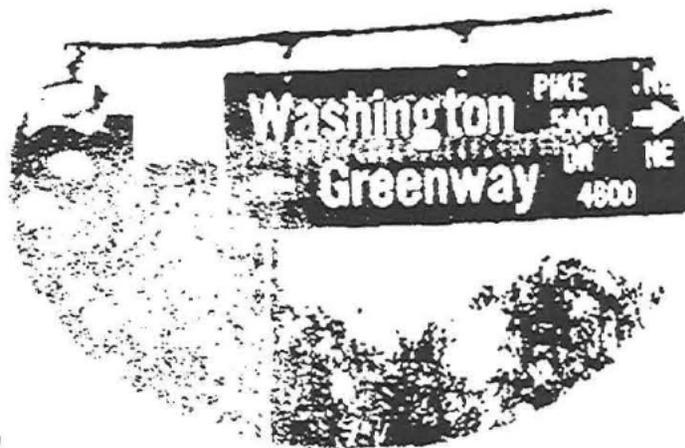
If you have any questions regarding this project, please contact us at 215-6100.

WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015



COMMENTS:

As a resident of Shannon Valley Farms subdivision I feel that the expansion of Washington Pike between the interstate entrance/ Target to Murphy Rd is a huge need. Traffic is always congested between that area. It will just become worse as a new church is about to open and new developments opening in the future. Many people get onto Murphy Rd Washington Pike to get to the interstate which is also an added congestion issue.



NAME
ADDR
E-MAIL
PHON
CELL

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Please send comments by July 17, 2015.
If you have any questions regarding this project, please contact us at 215-6100.

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WASHINGTON PIKE ROADWAY IMPROVEMENTS PROJECT
PUBLIC MEETING
June 30, 2015

COMMENTS:

Please keep this project on your agenda. The traffic in this area is a nightmare during rush hour in the mornings and evenings and this would alleviate a lot of it.



NAME _____

also be ma
Engineer, (see reverse side) or e-mailed to: tele
Please send comments by July 17,
If you have any questions regarding this project, plec



Robin Hodges

From: Tom Clabo
Sent: Thursday, July 02, 2015 9:13 PM
To: Robin Hodges
Subject: Fwd: Washington Pike Improvement Project

Sent from my iPhone

Begin forwarded message:

From:

Mr. Clabo, as a resident of Northeast Knoxville, my wife and I use Washington Pike almost on a daily basis to access shopping as well as I-640. We were not able to attend the public meeting on the Washington Pike Improvement Project but would like to show our support for this needed improvement. We are looking forward to seeing the funding for the project finalized.

Robin Hodges

From: Tom Clabo
Sent: Friday, July 03, 2015 3:01 PM
To: Robin Hodges
Subject: Fwd: Washington Pk Roadway Improvement

Sent from my iPhone

Begin forwarded message:

Subject: Washington Pk Roadway Improvement

Mr. Clabo,

I live in the Wyngate Subdivision off of Washington Pike, and I am wanting to voice my support of a walking path and bike lanes on the new Washington Pike Roadway Project. It would be so nice to be able to walk or bike to the nearby Harvest Park by way of Washington Pk. Please consider making the new roadway as pedestrian and bike friendly as possible. Thanks!

Robin Hodges

From: Tom Clabo
Sent: Friday, July 03, 2015 8:52 PM
To: Robin Hodges
Subject: Fwd: Washington Pike Project

Sent from my iPhone

Begin forwarded message:

Subject: Washington Pike Project

Mr. Clabo,

I want to voice my support for the Washington Pike project with sidewalks and bike lanes. I live in Wyngate and occasionally commute to work via bike to downtown Knoxville. The stretch of Washington Pike between Wyngate and Target is dangerous for cyclists and pedestrians. Bike lanes and sidewalks would allow me to commute to work via bike in a much safer manner. The increased safety would make it more comfortable to commute to work via bike more often. It would also be nice to walk or ride to New Harvest Park and the shopping center.

Thanks,



Robin Hodges

From: Tom Clabo
Sent: Thursday, July 16, 2015 8:09 PM
To: Robin Hodges
Subject: Fwd: Washington Pike Widening

Sent from my iPhone

Begin forwarded message:

Subject: Washington Pike Widening

Tom,

I would like to commend you on the Washington Pike plan. As a resident of Wyngate subdivision, I would love to see bike lanes and sidewalks connecting us to Harvest Park. That will make this area feel much more like a community, being able to walk or ride a bike to the playground or for a quick shopping trip. Thank you so much!



Robin Hodges

From: Tom Clabo
Sent: Friday, July 17, 2015 9:20 AM
To: Robin Hodges
Subject: Fwd: Washington Pike project

Sent from my iPhone

Begin forwarded message:

Subject: Washington Pike project

My name is _____ and I live in the Shannon Valley Farms community near Washington Pike. I am writing in support of the proposed improvement project that would increase lane sizes and improve traffic flow. Our community continues to grow, and this road is the only way for people to get to and from 640 if they live in our area and even far past into Corryton. Right now, traffic is terrible and with the church addition going in, things will only get worse. This project is the only thing that will make traveling bearable as the area grows. Please find this project so that my neighbors and I can have a easier time traveling to and from our houses.



Robin Hodges

From: Tom Clabo
Sent: Friday, July 17, 2015 8:49 AM
To: Robin Hodges
Subject: Fwd: Washington Pike Improvement Project

Sent from my iPhone

Begin forwarded message:



Subject: Washington Pike Improvement Project

Mr. Clabo,

I wanted to voice my opinion in favor of the improvements proposed to be made to Washington Pike by the City of Knoxville. I work in downtown Knoxville on Gay Street, and I drive Washington Pike from Murphy Road to I-640 every day. I have lived off of Washington Pike (either Edmondson Lane or Murphy Road) for almost ten years. During that time, traffic has increased, development has increased, and Washington Pike needs to be improved to accommodate the growth in development and traffic. I applaud the City's efforts and work in getting this project underway. I attended the town hall meeting at New Harvest Park and spoke to you there about the project. I think it is a much needed project, and it would be beneficial to the community. Moreover, the project would demonstrate the City's commitment to using transportation dollars in areas other than Cumberland Avenue and West Knoxville. As the City has annexed and has responsibility for Washington Pike out to Murphy Road (thereabouts), it is also the City's responsibility to improve and maintain this stretch of important roadway. Thus, I am fully in favor of the project.

I hope the project proceeds, and thank you for your work on it and the work of the men and women of the City Engineering department.

Thank you,



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1 Summary

I am submitting my comments for the June 30, 2015 public Design Review meeting for the Washington Pike Project. The comments are thorough because in six months I do not want to hear "We've never heard this concern before". This also includes comments on the documents in the planning phase, since there was never a public meeting that covered these documents.

I do believe the project can produce an excellent outcome for the all parties – residents, businesses, drivers, pedestrians, cyclists, taxpayers, and the environment.

These are the brass-tacks that I'm most concerned with:

- A design using roundabouts, instead of traffic signals. I believe this design will address a number of issues and provide a better outcome for the community, for drivers, and the environment. Might even be less expensive!
- Mitigation measures for foreseeable impacts need to be identified, analyzed, and agreed on. The work to-date in the Noise Technical Report and the Historic Structures Survey has glossed over mitigation measures. These reports also didn't analyze a design based on roundabouts. The reports need to be updated.
- Zoning and corridor overlays need to be put into place to guide development of the corridor, and prevent unintended siphoning away of commercial activity from the struggling East Town Mall area
- Public involvement needs to be improved.

We don't need huge documents flying back-n-forth; I hope the project planners and the community can establish a collaborative relationship where we quickly work through issues, update just enough of the documentation, and move on to the next bit. That'd be a great outcome for all involved, with the least cost of funds and time. I'll be happy to help with communications, design sessions, research, or any other way that I can.

2 Planning Stage Comments

These comments on the Planning Stage items are being submitted because this is the first opportunity I have been provided to officially submit comments on the project. I would have appreciated the opportunity to provide these comments earlier in the process.

2.1 Public Involvement during Planning Stage

TDOT's Locally Managed Projects Process Overview Flowchart (http://www.tn.gov/assets/entities/tdot/attachments/LGG_Flowchart.pdf) calls for an "Appropriate Level of Public Involvement" between steps 4 and 5 when the environmental document is written. Two public briefings were held at the Alice Bell / Spring Hill Neighborhood Association Meetings on May 21, 2012 and July 16, 2012, but no comments were solicited or recorded during those meetings. Draft copies of the January 2013 Historical Structures Survey, September 2012 Functional Plan, or Conceptual Stage Relocation Plan were not provided to the neighborhood associations or myself before they were finalized.

The D-List Categorical Exclusion was never reviewed with interested parties or offered for comments. It was submitted by the contractor, Jeff Mize with CDM Smith, to TDOT and approved without any circulation to interested local parties.

The level of public involvement during the planning phase was not appropriate given the expressed interest of local residents and neighborhoods. Comments should have been solicited, documents should have been released for review and feedback gathered and incorporated during this process.

2.2 Traffic Counts Used

The traffic numbers used in the *2009 Transportation Planning Report* are the same for the Build and No-Build options. There is no analysis of how much traffic volume will increase with the road project being built versus not being built. When Washington Pike is improved, the improved road conditions will probably cause traffic levels to increase – the road will be a more attractive route for the area. If the road improvements make it more attractive, the impact of vehicles transiting through and adjacent to the property on Murphy Road and Washington Pike will increase urban incursions into the rural setting of Murphy Springs Farm.

I believe different traffic numbers for the Build and the No-Build options should have been used in the Noise Report and Historic Structure Survey to determine effects, with the Build option representing a higher level of traffic. I request an analysis of to be done and the effects and noise report to be reviewed with those updated traffic counts.

2.3 Comments and Questions on Noise Report

These comments reference the *Noise Technical Report for Washington Pike Roadway Improvements From I-640 to Murphy Road* dated November 2012.

I don't understand how the model came out with the noise figures it did, and therefore don't have faith that the model is correct.

- Site 10, near the intersection of McCampbell Drive and Washington Pike, had a field measured noise level of 68.1 and a TNM predicted noise level of 68.9 dB(A), measured from 4:10-4:50PM on Monday, July 2 2012 (Monday of a holiday week, and when school is not in session.)
- Noise levels should have been measured during the school year, when traffic volumes are higher.
- Receptors modeled on the two parcels next to Site #10 modeled out at 63 dB for loudest hour traffic, which is lower than the observed field measured noise of 68.1 dB. That doesn't make sense to me, and it gives me no confidence in the noise model that was put together and used to compute impacts.

The noise study should have performed field measurements in the Oak Grove residential community, which will be highly impacted by the vicinity of the project to their homes. The noise study should have made field measurements on Murphy Road near the railroad tracks to establish noise levels for the full project Area of Potential Effect (APE). Finally, receptor locations should have been modeled in the grassy field just northeast of the Washington Pike / Murphy Road intersection, and on the Hugh Murphy House. Each of these are locations in the Murphy Springs Farm district listed on the National Register of Historic Places.

I believe that the noise impact will be substantial for the Oak Grove residents. In some cases the road will move closer to their house and have more vehicles traveling on it, thus increasing noise levels. I'm not confident the noise study took the changes in road position into account.

There is no map that shows the locations of the 153 locations; I cannot tell from the tables which location each receptor is associated with.

The design speed limit of the project in the noise study is 40mph, with a posted speed of 35 mph. I have heard different speed limits proposed (45mph and 40mph), which would be a different output from the noise study since faster-moving vehicles are noisier. From personal experience, the actual speed that vehicles travel on this stretch of road is 45-50mph, and with the redesign I believe vehicles will travel faster, not slower. Faster moving vehicles mean the study should show more impacted noise receptors, with a greater level of impact.

The use of noise barriers was summarily dismissed as not feasible because of driveways in section 8.5. No discussion was given as to what types of noise barriers might be available. No viewpoints of the public were taken into account during this process. I desire that different types of noise barriers and abatement measures be described (I'm no expert and don't know what's available), and then analyzed for appropriateness.

Finally – the summary (section 11.0) says that the analysis is provided to local officials to ensure... future developments are planned, designed, and programmed in a manner that will avoid traffic noise impacts. Could somebody explain what this means? Does it mean that future residential and commercial developments should be planned to not increase traffic volumes above what is predicted in order to mitigate noise impacts?

The Noise Technical Report should have been discussed in a public meeting, with various mitigation options explored, and public feedback solicited and incorporated.

2.4 Comments on Historical Structures Survey

2.4.1 Incorrect Boundary for Murphy Springs Farm

The boundary for Murphy Springs Farm (KN-2586) identified in the report *Historic Structures Survey for the Washington Pike Roadway Improvements Project* on pages 35 and 36 is incorrect. In the report, the boundary is identified as parcel 049 080 (4508 Murphy Road), an approximately 49.5 acre area. The correct boundary was documented in the 2015 July 14 listing of Murphy Springs Farm on the National Register of Historic Places. The border is identified in the figure below, with a verbal boundary description of:

The Murphy Springs Farm district is comprised of portions of six parcels, roads, and railroad totaling 176.34 acres in Knox County as identified on aerial map below. The property is bounded on the north by the Shannon Valley Farms subdivision, on the east by Luttrell Rd, on the south by Washington Pike and Murphy Creek, and on the west by adjacent agricultural property, residential property, Murphy Road, and a private school.

The parcels included within the contiguous boundary are:

049 083

049 080, which includes the land under the railroad

Murphy Rd between parcels 049 083 and 049 080

049 077 north of Washington Pike

049 071 except the northeast portion across Murphy Rd

050 001 and the railroad right of way splitting the parcel

Additionally, an approximately 50' x 50' section of 049 078 where the Murphy Family Cemetery is located is included within the district but is not contiguous to the above parcels.



Figure 1 – Border for Murphy Spring Farm district from July 14, 2015 listing of Murphy Springs Farm on the National Register of Historic Places

The boundary in the document in *Historic Structures Survey for the Washington Pike Roadway Improvements Project* was determined by TDOT staff after I supplied the initial proposed boundary information (approximately 207 acres proposed) in April 2012 to Jana Bean with CDM Smith. TDOT staff instructed Ms. Bean to identifying a smaller boundary area. I do not know if the SHPO was consulted (conflicting info), but I do know that nobody consulted me or historical resources in Knoxville such as Knoxville/Knox County Metropolitan Planning Commission historical zoning staff, Knox Heritage, or the East Tennessee History Center.

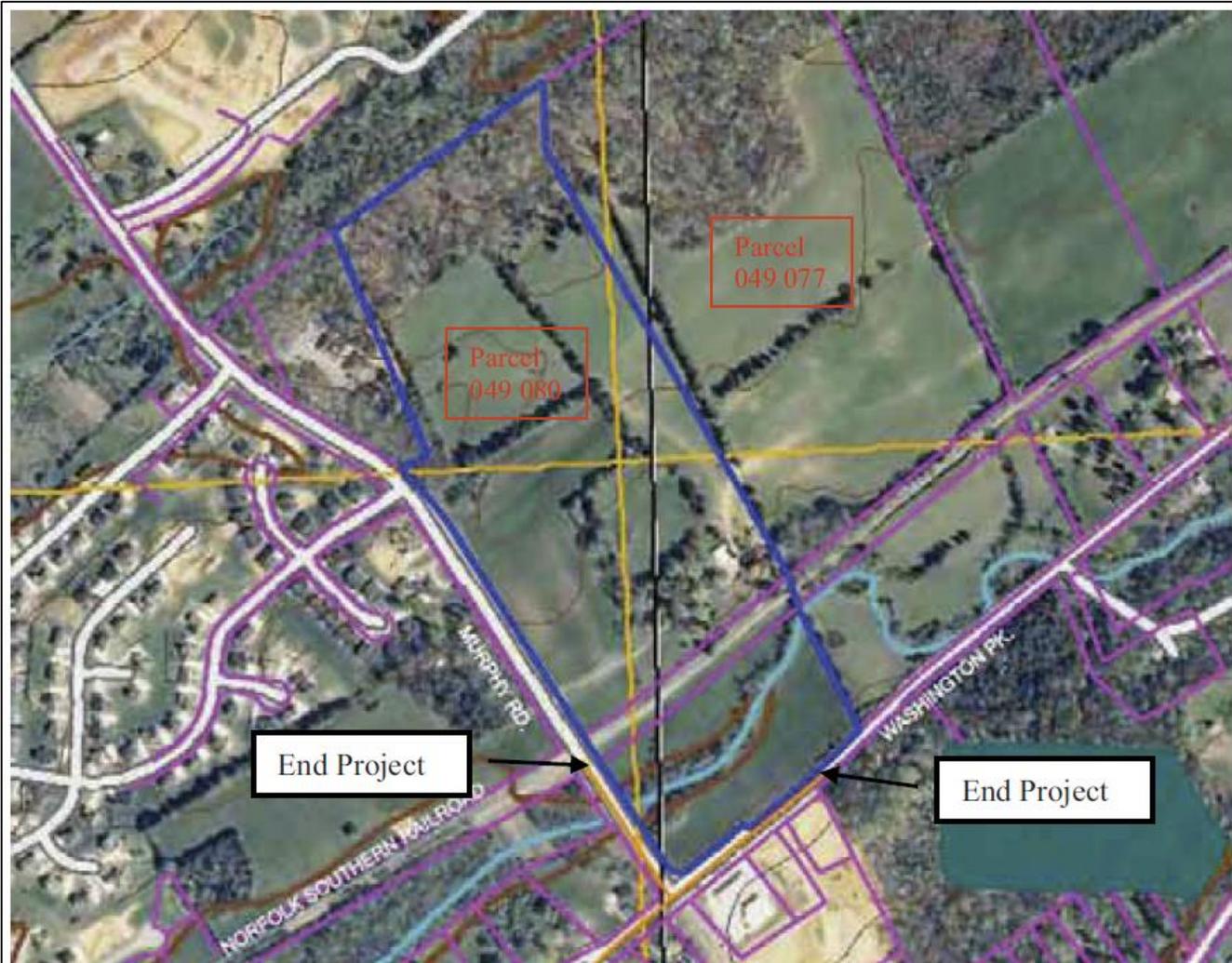


Figure 33 – Proposed National Register Boundary in blue for Murphy Springs Farm (KN-2586) with neighboring parcels shown in pink.

Figure 2 – Border for Murphy Spring Farm from *Historical Structures Survey for the Washington Pike Improvements Project* dated January 2013

The boundary I proposed was submitted in a national register nomination to the Tennessee SHPO the second half of 2014. The SHPO staff disputed the boundary since they had signed off on the above boundary, while the State Review Board agreed with the entire boundary. It was sent to the Keeper’s office as a disputed nomination for substantial review, and the Keeper’s office issued a Return that identified the appropriate boundary. An updated nomination was submitted in Feb 2015, approved by the Tennessee SHPO and State Review Board in May 2015, and listed in the National Register of Historic Places on 2015 July 14. A detailed chronology of events is listed in “Appendix A: Chronology of Murphy Springs Farm Boundary Determination.”

2.4.2 Assessment of Impacts under Section 106

2.4.2.1 Assessed using Incorrect Boundary

The boundary for Murphy Springs Farm is different than the boundary used to assess impacts. The Effect Determination from the Tennessee State Historic Preservation Officer dated March 12, 2013 was not based on the correct boundary, and therefore, the assessment of impacts and effects needs to be reviewed and revised. The correct district boundary includes a portion of Murphy Road south of the railroad tracks, which is part of the project scope analyzed in the report.

Secondly, the drawing on page 37 of the report does not represent the correct southern boundary of parcel 049 080. Parcel 049 080 extends to the centerline of Washington Pike from its eastern end until the point where the right-of-way expands, just west of the driveway to the pharmacy and restaurant. The figure on page 37 depicts some work, including widening and fill, inside of the district boundary on the eastern end of Washington Pike.

2.4.2.2 Inaccurate and Incomplete Visual Effects Assessment on Murphy Springs Farm

The intersection improvements at the Murphy Road / Washington Pike intersection are in the viewshed of the most significant resource of the district, the Hugh Murphy House. The visual Effects assessment identified a tree line that blocks the viewshed of the intersection, but this is a deciduous treeline that does not block the view in the winter. Vehicles, and their headlights, are visible in the fall, winter, and early spring from the Hugh Murphy driving westbound of Washington Pike into the intersection, and then turning left onto Murphy Road. Headlights shine into the front windows of the building and intrusively remind occupants of the urban incursions into the district. No assessment was made of the impact of the larger transportation intersection, with more signal lights, on the viewshed from the Hugh Murphy House.

The intersection improvements at the Murphy Road / Washington Pike intersection are in the viewshed of the agricultural fields on Murphy Road and not blocked by treelines. These agricultural fields are used for demonstration of early farming techniques, particularly plowing fields with mules and draft-horses. These activities are in view of the project area at the intersection and up Murphy Road to the railroad track. The increased scale of the intersection and road, with additional lanes and stoplights, and additional traffic volume detract from the character and feeling of being on a late 19th or early 20th century farm using traditional farming techniques.



Figure 3 – Fields on Murphy Road used for demonstration of traditional farming techniques

The assessment casually dismissed the impact on the grassy fields of the farm; it did not assess the difference of a three lane versus five line highway, of the extended four lane section from the intersection north to the railroad tracks, or of the addition of streetlights into the environment. No consideration was given of the reasonably foreseeable impact of additional commercial development at the intersection due to improved transportation infrastructure. The correct conclusion is that there would be an impact that would degrade the integrity of the visual setting of the fields and their historical agricultural association.

No assessment was made on the introduction of streetlights by the project. Streetlights were not mentioned anywhere in the report. Lighting is a design element that was missing and should have been included and assessed. The report should have identified that any street lighting must be designed to light up only the transportation area and not trespass into the adjacent property. Photometric designs should be prepared that indicate the lighting of the project length and impact on adjacent properties, and a limit should be agreed to as part of the design phase, perhaps 0.1 footcandles allowed on adjacent properties. Other lights, such as signal lights, road signs with yellow flashers, and others should be shielded to the extent possible from view from the farm.

Appropriate material and aesthetics of the retaining walls (p. 36) should have been specified and agreed to in the report, instead of delayed to the design phase. Concrete retaining walls are not appropriate; a stone retaining wall should be utilized, with a rough unfinished look reflecting the early settlement, rural eastern Tennessee character of the farm. I have additional material about retaining walls below in section 3.5 - Materials for Retaining Walls.

No assessment was made of any changes to utilities that would be required to accommodate the transportation project. Additional utility poles, taller poles, additional wires, or relocation of the poles into the district boundary represents additional, cumulative impacts that can reasonably be foreseen, but these were not accounted for the report.

In my opinion, applying the Section 106 Criteria of Effect to the total visual impact would create an Adverse Effect by directly, through construction of larger transportation features and introduction of new features (streetlights, sidewalks, curbs, gutters, 500 lateral feet of 3-5 foot tall retaining walls), and indirectly, through foreseeable growth in traffic and commercial activity, diminishing the integrity of the agricultural and rural historic landscape's setting and feeling that make Murphy Springs Farm important under Criterion A. Each items individual visual impact may be small, but the cumulative impact will reduce the farm's ability to impart its rural character, especially when foreseeable additional developments of commercial operations and transportation improvements to Murphy Road and Washington Pike outside for the project boundary occur. Given that protective covenants such as conservation easements are not currently in place for Murphy Springs Farm, the development of an improved transportation corridor could easily lead to a developer acquiring some or all of the district and developing, which would result in delisting on the National Register of Historic Places.

There was no discussion of mitigation measures for visual effects and impact. Project engineers and analysts should identify several alternatives and discuss their suitability in the report.

2.4.2.3 Noise Effects Assessment on Murphy Springs Farm

The Noise Impact Report modeled only a single receptor in the APE within the boundary of Murphy Springs Farm. This receptor was over 1,100 feet away and across the street from the Hugh Murphy House in an open field. No receptors were modeled at the most significant location (Hugh Murphy House).

The assessment of the widened road on the grassy fields at the Washington Pike and Murphy Road intersection was glossed over on page 36 of the report. When working in the fields, I can assure you that the noise from traffic is a substantial intrusion into the rural, early farm character of the property and diminishes the integrity of setting. The noise model in the report did not factually support any conclusions as well; no receptors were modeled in the grassy fields along Murphy Road, most particularly in the field at the intersection of Washington Pike and Murphy Road. These fields should be evaluated as they area an identified resource of the district and are closest to the project impact.

As I stated above, I can't figure out how a noise level of 68 dB was *measured* and then the model says the location at Weigel's and the two houses near the intersection are only 63dB.

As with the visual impact, the traffic numbers used in the assessment are probably incorrect. The study assumes the same 2033 traffic volume with the build and no-build scenarios. It is likely that traffic

volumes will be higher if improvements are made (Build) and would be lower if improvements are not made (No-Build). This was not taken into account.

The noise impacts were not well assessed in this report. The author takes one data point that's over 1,000 feet away from the main structure to make one claim, and then doesn't even have a data point to make the other point. Noise effects were not adequately assessed, and if they were, I believe noise levels would be above 68dB in the grassy fields and require consideration of noise barriers and other abatement measures. I would like to see this analysis done, and to have noise abatement measures identified and analyzed for suitability.

2.4.2.4 Assessment on Impact of Use on Murphy Springs Farm

The fields on the northeast side of the Washington Pike / Murphy Road intersection are used for hay, timber, and occasionally pasture – uses that contribute to the Criterion A significance. The proposed design calls for fill and slope along this area. This could make access by farm equipment or cattle difficult, especially between Murphy Creek northward to the railroad crossing, and would directly impact the use of the property in its historical role.

Mitigation measures should be identified, such as providing visually appropriate access from Murphy Road into the fields with grading and surfaces appropriate for farm equipment and cattle, as well as historically compatible.

2.4.3 Neglected to Document Past Impacts, Reasonably Foreseeable Future Effects

"Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative." 36 CFR 800.5(a)(1)

2.4.3.1 Past Impacts

Adverse effects can result from changes that occurred prior to the current undertaking, with project-related changes contributing to the adverse effect.

The report does not consider changes and their effects that occurred prior to the proposed undertaking but subsequent to the property's original evaluation of eligibility for the National Register (1986):

- Transportation features have been a part of the rural atmosphere and setting of Murphy Springs Farm since the early 1800s when Washington Pike was first constructed, and the 1890s when the railroad was built.
- Murphy Springs Farm was first identified as eligible for the National Register of Historic Places by local government staff in a 1986 survey of historical structures built before 1935 in Knox County.
- The transportation facilities maintained a rural character until the 1990s, when residential growth in the northeastern portion of Knox County increased traffic levels through the farm.
- In 1999, the northwest corner of Murphy Road and Washington Pike was rezoned from agricultural to commercial in anticipation of future road improvements. This resulted in land planning changes (below).
- In 1999, Murphy Road was improved from a narrow, two-lane road to a road with two 12-foot lanes, gates and signalized railroad crossing, a signalized intersection with Washington Pike, and a right-turn lane from Murphy Road to Washington Pike. Improvements were also made to Washington Pike to accommodate a left-turn lane from Washington Pike to Murphy Road. This resulted in increased traffic levels on Murphy Road as traffic to/from northeastern Knox County began to use Murphy Road instead of Tazewell Pike to connect to I-640.
- In 2001, local planners updated the Northeast County Sector Plan and designated a commercial node at the Washington Pike / Murphy Road intersection, and designated Murphy Springs Farm as low density residential on their planning maps. This resulted in:
 - In 2004, the old Farmer's Market (Washington Pike @ Greenway Drive) was converted to commercial use. The commercial growth resulted in new subdivisions off Washington Pike east of Mill Rd.
- In 2005, modern commercial development first appeared at the Murphy Road / Washington Pike intersection when a gas station was built. The attractiveness of building a gas station at that location was directly due to increased traffic from the Murphy Road improvement project in 1999.

- Additional property near the Murphy Road / Washington Pike intersection and along the project area was rezoned from agricultural/residential use to commercial use in 2007-2009 due to speculation of the proposed Washington Pike Improvement Project. This resulted in:
 - Additional commercial development occurred in 2012 when a pharmacy and restaurant were built.

Traffic volumes have doubled since Murphy Road was improved in 1999. Not all of the increased traffic volume is a result of the above actions, but a sizeable portion is, and that has contributed to visual impacts and noise impacts on Murphy Springs Farm. The author of the report refers to these the existing setting with “a busy intersection that is signalized and has utilities and commercial businesses at the corner” and “setting in a rural environment that has some urban incursions.”

Year	Murphy Rd (north of intersection)	Washington Pike (east of intersection)	Source
1999 (actuals)	5440	6,250	2001 Advanced Planning Report
2004 (predicted in 2001)	7,340	8,440	2001 Advanced Planning Report
2008 (actuals)	11,040	9,150	2009 Transportation Planning Report
2013 (projected)	12,970	10,750	2009 Transportation Planning Report
2033 (projected)	20,700	17,160	2009 Transportation Planning Report

Table 1 – Average Daily Trips near the Murphy Road / Washington Pike Intersection

2.4.3.2 Other Forseeable Present Impacts

Above I have identified impacts from noise, visual, and use on Murphy Springs Farm that directly result from the proposed project.

The impact of relocating utilities, the additional property required from landowners for new utility easements, and the effect of those relocations is forseeable but not considered.

The impact of building an improved transportation corridor on traffic volume is not considered. It was the same for the “Build” and “No-Build” scenarios. It is forseeable that an improved road Washington Pike will make it the preferred transportation route for traffic, and that traffic volumes would be greater for the “Build” scenario than the “No-Build” scenario.

2.4.3.3 Reasonably Forseeable Future Impacts and Effects

Future actions will also impact the setting of Murphy Springs Farm. Some are already on the books:

- A planned improvement of Tazewell Pike from Emory Road to Murphy Road (Regional Transportation Plan #09-640) will foreseeably increase growth in northeast Knox County and increase vehicle traffic demand on Murphy Road and Washington Pike.
- Property owners faced with increased traffic volumes and a larger road may find residential use to be undesirable and convert their property to commercial use. This increased commercial use will increase the urban incursions into the rural environment for Murphy Springs Farm. In June 2015 Dollar General began exploring turning the residential lot on the northeast corner of Washington Pike / Murphy Road into commercial use. This would be directly visible in the Hugh Murphy House viewshed and from the fields on Murphy Road.
- Planned road projects to widen Murphy Road from 2-4 lanes, as well as to widen Washington Pike east of the project area to 4 lanes, were listed in the [2006 Long Range Transportation Plan](#) and 2007 versions, but removed from the 2009 version. It is reasonably forseeable that those projects would be added back to the plan, and result in increased traffic, visual impact due to new transportation features, and increased noise to Murphy Springs Farm.

A reasonable conclusion can be made that land use changes will cause additional growth. Commercial development and additional transportation improvements will introduce new visual features to the transportation system and visual landscape, and increased vehicular traffic will introduce more noise and light pollution.

Additionally, further vehicular traffic on Murphy Road and a larger road would separate the field acreage on the western side of Murphy Road from the Hugh Murphy House and bulk of the district, diminishing the feeling of association. A similar problem will happen if Washington Pike is improved east of the intersection – the Murphy Family cemetery on the south side of Washington Pike would be cut off from the house and farm. Additionally, Washington Pike’s path on the south side of the district currently follows the original settlers path for horse-drawn wagons. When a person walks or drives on it where it runs next to Murphy Creek, they easily understand why that path would have been chosen for early horse-drawn wagons and carriages. A strong sense of association exists, and changes to Washington Pike will diminish the association with the rural heritage of the area.

2.4.3.4 Considering Indirect and Cumulative Impacts

The report did not assess *cumulative* impacts. Carol Legard of the Advisory Council on Historic Preservation [offers the following graphic](#) to help:

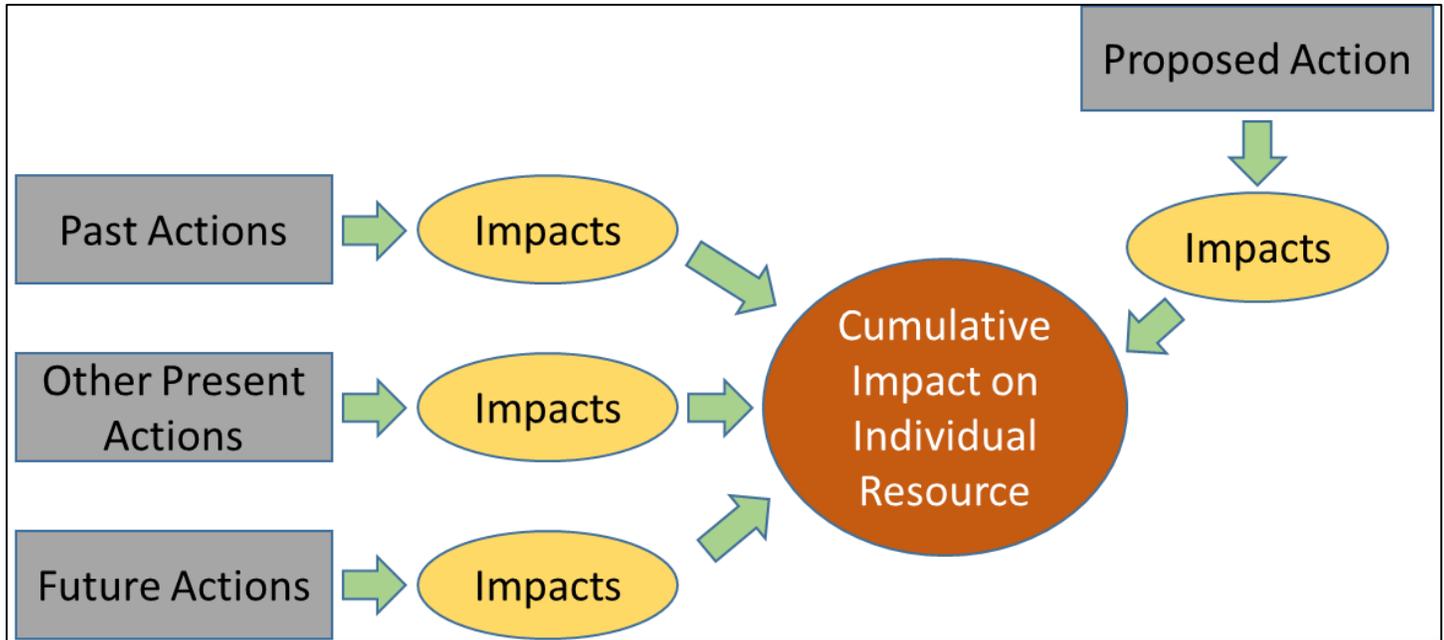


Figure 4 – Understanding Cumulative Impacts

The above sections identify Past Actions and Future Actions and their impacts, which were not assessed at all in the report *Historic Structures Survey for the Washington Pike Roadway Improvements Project*.

Additionally, the individual impacts of Visual Effects, Noise Effects, and Use were analyzed individually and each was determined to not have an adverse effect. There was no analysis was made of the cumulative impact on the historic rural and agricultural setting of Murphy Springs Farm by these individual effects, which I believe collectively and cumulatively diminish the character-defining setting.

2.4.4 Conclusion – Comments on Historical Structures Survey and Report

Fully considered, it is clear that the Washington Pike Roadway undertaking will have an Adverse Effect on Murphy Springs Farm as defined in 36 CFR 800.5(a)(1): “An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in **a manner that would diminish the property’s** location, design, **setting**, materials, workmanship, **feeling, or association... Adverse effects may include reasonably foreseeable effects caused by the undertaking** that may occur later in time, be farther removed in distance, or be **cumulative**.”

Murphy Springs Farm was listed under Criteria A and C for its local significance in settlement patterns, agriculture history, and local architecture of Knox County. The cumulative, adverse effects that have occurred in the past, that will occur as part of this project, and that foreseeably will occur as a result of the undertaking will diminish the rural, agricultural setting and association with the past – the reasons Murphy Springs Farm was listed on the National Register of Historic Places.

2.4.5 Public Participation Incomplete for Historic Structures Survey

Local Historic Groups Not Involved Early: Page 5 of the *Historic Structures Survey* mischaracterizes working group meetings with “groups representing historical interests”. I am member of two of the organizations represented at that meeting - Alice Bell Spring Hill Neighborhood Association and Northeast Knox Preservation Association. Both of those organizations are neighborhood groups focused on urban planning, crime, social services, and community support. They will advocate for historic preservation when an issue is brought to their attention, but that is not the lens they would have viewed those meetings from. The appropriate local historical organization, Knox Heritage, was not part of the working group. Knox Metropolitan Planning Commission was represented by its director, but the planner in charge of historic preservation was not at the meetings.

No Public Involvement from late 2006 until March 2013, and only a Mailing

There was no additional public involvement with local groups and individuals from October 2006 until the after the report was distributed on March 4, 2013. Native American tribes were consulted, but none of them have a Knoxville presence.

Critically, the historic preservation planning staff at the Knoxville-Knox County Metropolitan Planning Commission were not consulted, nor were staff at Knox Heritage.

The report states that “The City may choose to host a public meeting upon completion and approval of the Categorical Exclusion document and development of Preliminary Roadway Plans.” I can’t fathom how holding a meeting AFTER the documents have been completed and approved allows the public to participate. A meeting should have been held after the DRAFT of the Categorical Exclusion Document was completed. The first meeting with comments after the October 2006 working group meeting was on June 30, 2015 – a Design Review Meeting – nine years later.

Interested Parties were Not Mailed the Report. Why? TDOT’S Public Participation List Differs from the Report’s List of Interested Parties

On April 15, 2012 I sent a letter to Jim Hagerman, Director of Engineering for the City of Knoxville, identifying Murphy Springs Farm as a resource that should be considered as part of Section 106 analysis and requesting that an impact analysis be performed. I requested information on the traffic forecasting estimates, and to be notified of any public meetings on the project. This letter served as my request to be an “interested party” in the project communications, and especially regarding the historical survey process. I received a reply indicating that it was forwarded to the project manager.

Using formal Section 106 terminology, the letter on April 15, 2012 was my request to be a consulting party in the project due to my ownership of a resource eligible for listing on the National Register of Historic Places. I was never informed if I would or would not be a consulting party. This letter was included in the *Appendix B of the Historic Structures Survey*; it obviously reached the project manager and historic preservation consultant at CDM Smith.

Page 6 of the report asserts “Appendix B contains a list of historic groups, county historians, and other such individuals or organizations that might be interested in the proposed project. A copy of this report will be mailed to these interested groups and individuals.”

However, the City and/or their contractor CDM Smith never mailed a copy of the report to those individuals. Instead, TDOT staff took responsibility for sending the report and CDM Smith and City of Knoxville staff assumed everything was taken care of. Unfortunately, Tammy Sellers, Historic Preservation Supervisor, sent a letter and the report to a DIFFERENT LIST than the List of Interested Parties in Appendix B of the *Historic Structures Survey*.

The Public Participation list, which TDOT generated and mailed copies of the cover letter and report to, did not include the following entries from the List of Interested Parties in the report:

- Heather Bailey, Historic Preservation Planner, East Tennessee Development District
- Kevin Murphy
- Northeast Knox Preservation Association

Since I was not on the TDOT Public Participation List, and the City and CDM Smith assumed TDOT was using their List of Interested Parties, I never received the report. To this day – I have never received a copy of the report from a government, except for the copy posted on the City of Knoxville website.

TDOT's Public Participation List did add the Knox County Mayor.

When I First Obtained the Report, it was Incomplete

I received an email on April 8, 2013, which was after the 30 day comment period expired, from Knoxville-Knox County MPC historic planning staff advising me of the existence of the report. I immediately went to their office and reviewed the pages concerning Murphy Springs Farm. I didn't see or get a copy of the cover letter from Ms. Sellers.

Critically, I didn't Understand or Know What Was Going On

The cover letter provides the context for the report, and what the process is for discussing survey findings and participating in the process according to the Advisory Council on Historic Preservation. I didn't know anything about the ACHP, the comment process, or who I needed to send comments to.

Limited Response and Process

Kaye Graybeal at Knox MPC offered to send comments on to the report issuer on my behalf. I wrote several comments up raising concerns with effect of traffic, boundaries, visual barriers, etc. Ms. Graybeal forwarded those comments to TDOT and then the SHPO. SHPO responded about boundaries only, but no other concerns were addressed by any parties. I never received any comments back from TDOT staff. The only option offered was by MPC staff to review the drawings with engineering, but that didn't address anything.

No other comments were offered, and TDOT staff considered the report finalized since they had received an approval note from the SHPO on March 12th, 2013.

2.4.6 Non-Advisement of Rights

As an interested party ("consulting party"), I have never received a letter addressed to me advising me of the opportunity to have an active role in the Section 106 process. I now demand to have an active role in that process and for project staff, TDOT, and SHPO representatives to meet with me to discuss the report.

2.5 Integration with Local Planning Processes and Documents

Three sector plans, developed by the Knoxville-Knox County Metropolitan Planning Commission with extensive public input, and adopted by the City of Knoxville and Knox County, are relevant to this transportation project: East City Sector Plan (south of I-640), North City Sector Plan (north of I-640), and Northeast County Sector Plan.

The TPR calls out that the Knoxville Center District was identified as a "Special Development Opportunity Area" as part of a sector plan, and the TPR also states that the "Northeast County Sector Plan proposes preserving the floodplain protection area around Loves Creek headwaters to limit future flooding in the area". (TPR, p. 16). The TPR also calls out the mention of a lack of pedestrian facilities.

However, the APR and TPR neglected to integrate with a special development opportunity area in the Northeast County Sector Plan called "Washington Pike: A Rural Heritage Corridor". This proposed that "new development should consist of conservation subdivisions to preserve views along the corridor and protect environmentally sensitive areas by maintaining large open spaces". The Northeast County Sector Plan also calls for "Ritta: A Neighborhood on the Rural Fringe" that is just to the east of the end of the project corridor on Washington Pike. See

The Advanced Planning Report, the Transportation Planning Report, and other documents in the planning phase don't mention these two concepts, nor do they address how the planning and design of the transportation project could be implemented to enable these development concepts.

The proposed design should provide a transition between the urban I-640 / East Town Mall area and the Ritta / rural heritage corridor areas. To me, a five-lane signalized road does not provide that transition. Instead, a design utilizing roundabouts, and possibly just two lanes between roundabouts, is a more appropriate design to support the local land use and community planning outlined in the sector plans. Roundabouts provide a more rural feel to a roadway.

2.6 Comments on D-List Categorical Exclusion Document

2.6.1 Public Involvement

Working group meetings were held with neighborhood groups in July and October 2006, but no general public meetings providing an opportunity for comments were held before the D-List Categorical Exclusion Document was signed.

The "Project Update" meetings in May and July 2012 were one-way communications with no comment cards, meeting agendas, attendance sheets, or meeting minutes collected. The characterization that at these meetings there were "no major concerns in regard to the project itself" is misleading. There were no concerns because we didn't have the actual information, like the Historic Structures Survey, Noise Technical Report, or detailed functional plan, at those meetings.

No process was provided to the public for participating in the drafting or review of the environmental documents (except the TDOT letter for the Historic Structures Survey). Most of the time, the first time the public finds out about documents are when they are posted to the website with the word "Final". The letter from city engineering to Alice Bell / Springs Hill Neighborhood Association and myself dated May 14, 2013 did not provide identify any public input opportunities until the Design Review meeting, which was held on June 30, 2015.

Furthermore, the required public involvement for the Section 106 Review was incomplete, as documented above in section 2.4.5 - Public Participation Incomplete for Historic Structures Survey.

2.6.2 Project Alternatives

A build alternative utilizing roundabouts was never mentioned or considered.

2.6.3 Relocation and Right-of-Way Impacts

No assessment or consideration was made regarding the impact of relocating utilities. When the road widens and utilities are displaced, the utility companies must relocate and obtain additional easements. This is foreseeable.

2.6.4 Noise

See comments above in section 2.3 - Comments and Questions on Noise Report.

2.6.5 Section 4(f) of the Department of Transportation Act of 1966

While no right of way is required, the proposed project may change the setting in a rural environment that has some urban incursions.

2.6.6 Section 106 of the National Historic Preservation Act

I explicitly disagree with this. National Register of Historic Places listed historic/architectural properties are adversely affected.

2.7 Suggested Mitigations from Planning Phase

The following are suggestions to minimize the adverse, cumulative effects that the undertaking. The appropriate time to implement these mitigations is now; no consideration to effect was given during prior road projects or land use planning efforts. Future transportation projects may use local funding and avoid the need to implement mitigation measures even as they contribute to the urban incursion.

These suggestions are provided based on the documents available during the planning phase.

These suggestions should be fully explored through the design phase, and several of them may require policies at the local government level to be implemented:

1. **Street lighting** - lighting must be designed to light up only the transportation area and not trespass into the adjacent property. Photometric designs should be prepared that indicate the lighting of the project length and impact on adjacent properties, and a limit should be agreed to as part of the design phase, perhaps 0.1 footcandles allowed on adjacent properties. Other lights, such as signal lights, road signs with yellow flashers, and others should be shielded to the extent possible from view from the farm.

2. **Utility relocation** – utilities, especially electrical poles, should be located within the project right-of-way and not require relocation inside the National Register boundary.
3. **Noise barriers** – noise barriers should be installed at the intersection of Washington Pike and Murphy Road, and along the eastern side of Murphy Road. They should also be given more than the cursory consideration they were given for the Oak Grove residential area, and any methods of mitigating those should be included.
4. **Roundabouts** – A Build Alternative using roundabouts instead of signalized intersections should be designed and considered. Roundabouts should especially be preferred at the Murphy Road and Mill Road intersections which are adjacent to residential areas. Roundabouts are a quieter design versus signalized intersections due to less acceleration and fewer sudden “hard stops”. Additionally, landscaping of the central island and approaches could provide a transitional area from hard urban streetscapes to rural, agricultural areas.
5. **Visual barrier** – a historically sympathetic visual barrier should be installed to mark the boundary of the road right-of-way with the historic farm and protect the viewshed from further incursions.
6. **Access to fields** – visually compatible access to the fields along Murphy Road must be included in the project to allow continued agricultural access to the fields.
7. **Planning and Zoning guidance** – zoning and corridor overlays should be implemented to guide commercial development to lessen visual impacts. Plans should discourage heavy commercial use at the intersection and encourage lighter, residential or office uses.
8. **Knox County Commits to Unified Design** – Knox County Engineering should be working with the project team and completing a unified design for the Murphy Road and Washington Pike segments to the north and east of the intersection. The mitigation measures identified above should be committed to by the County and the City, and TDOT should require the County to implement them.

3 Comments on Design Review

My comments after the Public Design Review Meeting held at New Harvest Park on June 30, 2015, with the Preliminary Plan Display

(www.knoxvilletn.gov/UserFiles/Servers/Server_109478/File/Engineering/Projects/PublicHearing-display-6-30-2015.pdf) and the Preliminary Streetscape Display

(www.knoxvilletn.gov/UserFiles/Servers/Server_109478/File/Engineering/Projects/Washington Pike Streetscape 2015-06-30.pdf).

3.1 Use Roundabouts instead of Signalized Intersection

I'd like to see a Build Alternative designed using roundabouts for the Washington Pike roadway stretch from I-640 to Murphy Road. Perhaps not all of the intersections will be suitable for roundabouts, but several of them probably will work fine.

Roundabouts could be a better solution than signalized intersections for this project:

1. The project area has a number of intersections with intersections with heavy left turn volumes - intersections where roundabouts are especially good candidates for smoothly flowing traffic¹ ("*Roundabouts*" Chapter 3.63). The intersections are:
 - Eastbound Washington Pike turning left to northbound Murphy Road
 - Westbound Washington Pike turning left to southbound Mill Road
 - Westbound Washington Pike turning left to southbound Washington Pike @ Greenway Drive intersection
 - Target Shopping Center traffic turning left onto eastbound Washington Pike
2. The proposed complete streets design, with sidewalks and bike lanes, encourages pedestrian and bicycle use. Roundabouts have fewer pedestrian conflict points than signalized intersections and are usually safer for cyclists ("*Roundabouts*", Chapter 5.3.3 and 5.3.4). A 2002 study by the Southeastern Transportation Center at the University of Tennessee - Knoxville found that converting conventional signalized intersections to modern roundabouts may reduce pedestrian-vehicle crashes and conflicts.² Roundabouts are also commonly called out as possible element of "Complete Streets" by transportation planners.
3. Roundabouts reduce total and injury crashes ("*Roundabouts*", Chapter 5.3.1). Reducing crashes and injuries is the key objective for where and how to use available funds that local and regional transportation officials have cited in recent years.
4. Traffic in the project area is very "bursty" for rush hours, and is substantially less outside of 7-8:15AM and 4:30-6PM on weekdays. Signalized intersections will cause an excessive amount of waiting during the non-rush hour periods, while roundabouts will allow traffic to smoothly flow through the project area during non-rush hour periods with much less wasted time (and impact on air quality). Rush-hour periods are going to strain any intersection design - signalized or roundabout.

There may be some concerns that a roundabout may not work at an intersection where traffic volumes are higher, and that a signalized intersection will work better. I've read that there's a limit of a volume range (entering and conflicting volumes) where above 1,800 vehicles per hour, it may be more than a two-lane roundabout entry can handle (Page 3-23 of the Roundabouts Report). That's possible - it needs analysis - but one point needs to be taken into account: even with the mitigations proposed, the 2009 Transportation Planning Report shows that most of the intersections in the project area are projected to operate with a Level of Service of F in 2033 (page 325 of the TPR PDF file). I'll repeat that - Service Level of "F" even with signalized intersections and roadway improvements. So if stoplights aren't a solution that provides a high level of service, let's use roundabouts, even if there are concerns about roundabouts providing a lower level of service at peak traffic volumes. Stoplights provide a failing level of service too, and roundabouts will provide better service and lower emissions during non-peak times. And their safer.

¹ *Roundabouts: An Informational Guide, Second Edition*. Transportation Research Board of the National Academies, National Cooperative Highway Research Program. 2010.

http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_672.pdf

² Stone, John R., Chae, Kosok, and Pillalamarri, Sirisha. *The Effects of Roundabouts on Pedestrian Safety*. August 2002. http://nacto.org/docs/usdg/effects_roundabouts_pedestrian_safety_stone.pdf Accessed 2015 July 19

Modified roundabout designs may be needed to accommodate the unique traffic patterns of the project area. Example: The traffic numbers for the Murphy Rd / Washington Pike intersection may indicate a multi-lane roundabout is needed, or that it may not even be sufficient. However, I'd bet that a single-lane roundabout will work well at that intersection, if a dedicated right-turn bypass lane from Murphy Rd to Washington Pike is added, and then tapers into the Washington Pike traffic heading into Knoxville. Right-turn bypass lane capacity forming a new lane adjacent to existing traffic (non-yielding bypass lane) had not been modeled by FHWA in the 2010 report (*Roundabouts*, page 4-13), but "its capacity is expected to be relatively high due to a merging operation between two traffic streams at similar speeds."

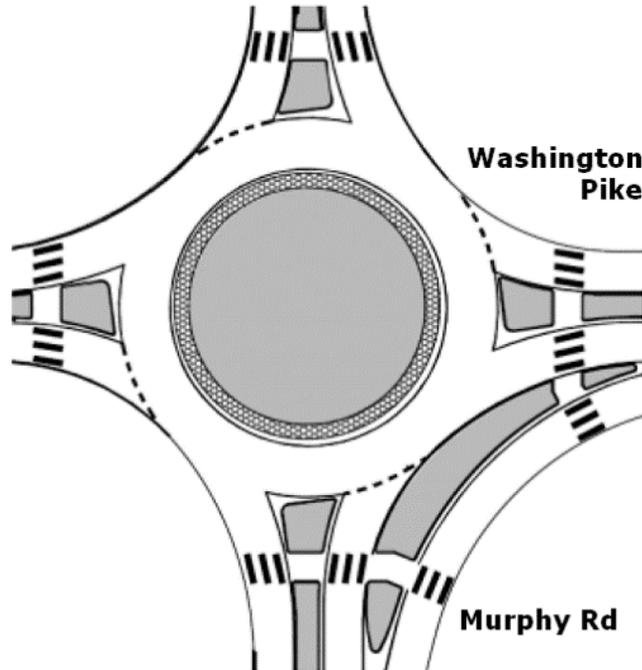


Figure 5 – Roundabout with Right-Turn Bypass Lane at Murphy Road

Same situation at Mill Rd / Washington Pike for traffic turning right from Mill Rd to Washington Pike - single lane roundabout, dedicated right-turn from Mill Rd to Washington Pike.

There is space at the Murphy Road / Washington Pike to install a roundabout if the unoccupied property on the northwest corner of the intersection is used (Property # 49 on the map).

There is space at the Mill Road / Washington Pike intersection to install a roundabout. There is an empty field on the southeast side of the intersection. The house on the southwest side is zoned for commercial use, and the last time I spoke with the owners they were interested in selling it. That property could be acquired if needed for a roundabout.

A roundabout at the Target shopping center may be more problematic, but re-designing the lanes on the railroad bridge and considering a one-lane instead of two-lane roundabout may help. Additionally a small right-of-way dedication from the Target center could provide some additional needed space. A dedicated right turn lane from Washington Pike to Washington Pike eastbound would be helpful, especially in the afternoon traffic rush.

It would be terrific if the signalized intersections on Washington Pike at both the entrance and exit to I-640 were roundabouts as well. It takes a really long time for traffic to flow from the eastbound exit ramp and turn left onto Washington Pike; a roundabout there could be a game changer for flowing traffic more smoothly through the area. The roundabout at the I-640 eastbound exit ramp is out-of-scope for this project, but should be considered in future planning.

Another reason to use roundabouts: the project area is the transition from urban highway (I-640) to rural country (Washington Pike and Murphy Road). The current Northeast Country Sector Plan proposes "Washington Pike: A Rural Heritage Corridor". How about roundabouts for rural character, instead of a bunch of stoplights?

Using roundabouts could reduce the number of lanes required (see next section and discussion of *Wide Nodes and Narrow Roads* concept.)

Roundabouts would also help the residents of the area with design concerns. In particular, Oak Grove area residents have expressed concerns about the proposed design and center median that will keep them from making left turns out of their driveway onto Washington Pike. With a roundabout at the Mill Rd intersection, residents on the south side of Washington Pike could easily turn right, go to the roundabout, and perform a U-movement to go left (westbound) on Washington Pike relative to their house. Oak Grove residents on the north side of Washington Pike would not receive that benefit, but hopefully only two lanes without a central median would be required, so they could turn left from their driveway.

These are some thoughts on roundabouts. I'm a big fan of them - I've driven a lot in Commonwealth countries and Europe where they use roundabouts. Traffic flows more smoothly, there's less time wasted at lights, and they're generally more pleasant visually (less air clutter). I think they might be a great option for this project, and I'd like to see a design alternative analysis done.

It looks like Section II, Chapter 4 of the March 20, 2015 TDOT Roadway Design Guidelines has information concerning roundabouts, along with a typical design document. Note that the TDOT Guidelines are based on FHWA-RD-00-067 written in 2000, which was superseded by NCHRP Report 672 in 2010.

In a paper by Mark Johnson and William Hange of the City of Loveland³, they studied five roundabout projects which were selected to exemplify how the operational characteristics of roundabouts better achieved the project objectives than the signalized alternatives. The summary was:

- Roundabouts provided improved traffic operations, safety, and fit into the context of the project sites very well.
- The roundabouts mitigated the negative attributes often associated with roadway and highway projects, such as impacts to business access, residential impacts, costly roadway and structure widening.
- Like all transportation projects, roundabouts also require trade-offs and of course there are many situations when signals will simply outperform roundabouts
- However, roundabouts and signals are not mutually exclusive. In fact, they are compatible and can be used in a 'systems approach' to achieve optimal operations
- Roundabouts are suitable for low, medium, and high volume situations
- Roundabouts are not a panacea and detailed technical analysis, based on sound engineering principles, is absolutely critical to the success of all roundabout projects

Finally, one of the reasons the Washington Pike Widening Project was undertaken to improve air quality, and CMAQ funds are used for most of the project costs. Several studies have found that replacing signalized intersections with roundabouts reduces vehicle emissions through the area by 16-30%⁴, although these figures must be analyzed for each designed intersection. Given the opportunity to reduce emissions and improve air quality, a key goal of the projects, roundabouts deserve a careful analysis.

3.2 Reducing Number of Lanes

I am not a fan of a five lane superhighway connecting Washington Pike to Murphy Road. A number of my neighbors, especially in the long-established Oak Grove section, have expressed trepidation at the inappropriate character of a large, wide road through the heart of their neighborhood.

Residents of Oak Grove have also expressed significant concern about the wide right-of-way acquisition that will be required to the designed corridor width, and that this will significantly impact their current land. Some houses that are 70 feet off the road will now be less than 20 feet off the road. The wide road also contributes to increased project costs for right-of-way acquisition, construction, and continuing maintenance.

³ Johnson, Mark T. and Hange, William A. *Modern Roundabout Intersections: When To Use them? A Comparison With Signalized Intersections*. Accessed 2015 July 19. <https://www.k-state.edu/roundabouts/news/ITEPaper.pdf>. March 2003.

⁴ Federal Highway Administration. *Reference Sourcebook for Reducing Greenhouse Gas Emissions from Transportation Sources*. Accessed July 19, 2015. http://www.fhwa.dot.gov/environment/climate_change/mitigation/publications_and_tools/reference_sourcebook/page06.cfm#s5.

I believe it would be far better to use roundabouts and use the "Wide Nodes and Narrow Roads" concept, potentially with the need for only a single lane between intersections. I'm not sure how much that will help the residents that live close to the Washington Pike / Mill Road intersection - land may be required for the approaches and entrys, but perhaps it will lessen the overall ROW requirements and construction costs if we only need two lanes in each direction instead of 5. More info on using roundabouts, road diets, and complete streets is in a presentation for Urbana, Illinois by Gary Cziko, available at <http://gcziko20100720.notlong.com>

3.3 Separate Project Scope – Plan Phase and Design Phase

I am extremely concerned that the Project Scope during the Planning Phase is different than the scope of the project presented at the Design Review Meeting on June 30, 2015. The design review meeting showed the project stopping at the intersection of Washington Pike and Murphy Road. The functional plans, and all of the related assessments in the Planning Phase, had analysis based on the project continuing north of that intersection along Murphy Road to the railroad tracks, and east of the intersection along Washington Pike.

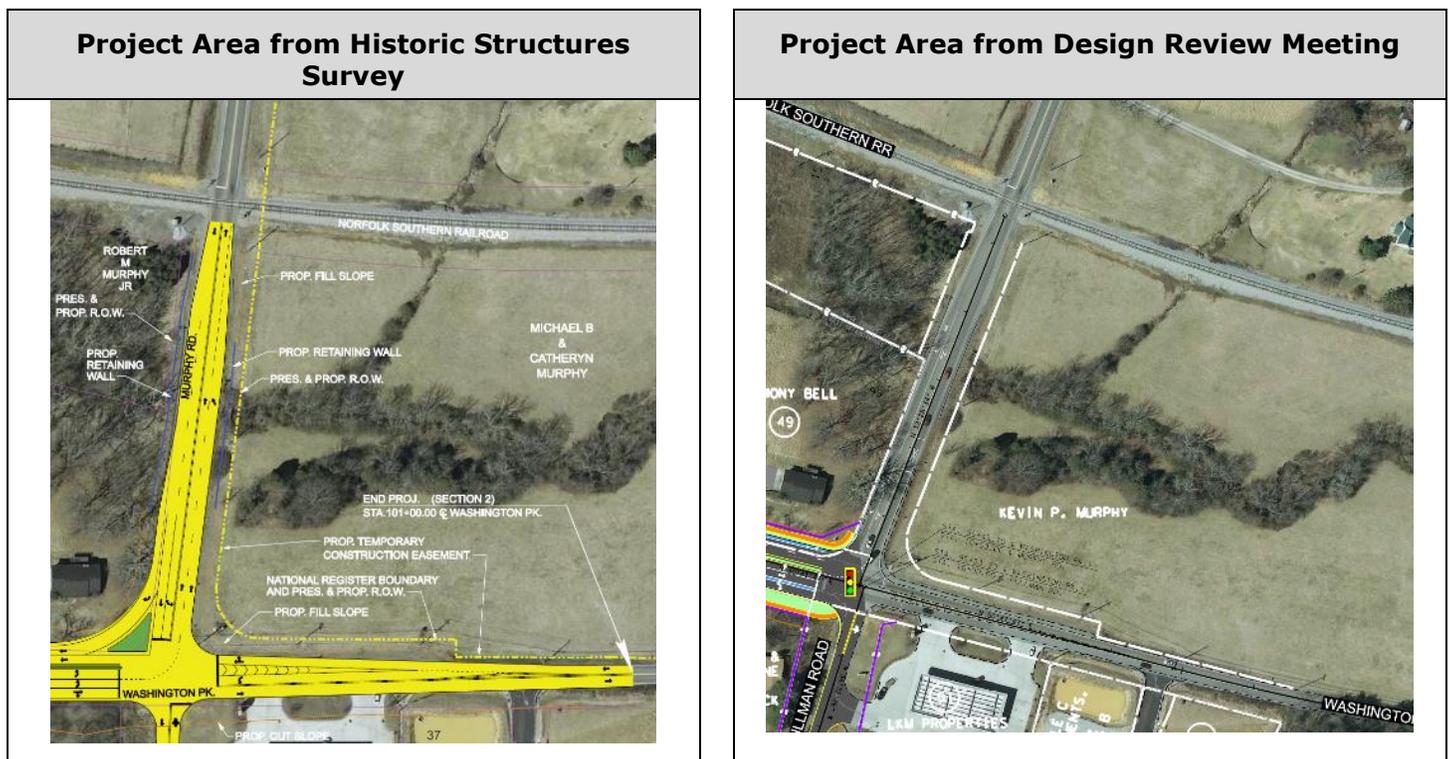


Figure 6 – Different Project Areas – Planning Phase and Design Phase

The May 14, 2013 letter from the city to the neighborhood groups and myself did state that the city project would only cover portions within the city limits, and that other improvements outside the city limits were advisable and would fall to Knox County.

What I'm confused about is what hand-off is occurring between the city and the county, or even if such a handoff is occurring. The county was not represented at the Design Review meeting. I cannot tell that the county is bound by any of the studies of impacts, effects, and recommended mitigations created during the Plan phase.

Any construction undertaken by the County to complete the project must be bound by the designs and plans above, including mitigations. For example: the approved environmental documents state that there will not be a Section 4(f) use because the required right-of-way at the intersection and the road segments will be taken from other properties, not Murphy Springs Farm. However, if the county is not bound by these designs, they may design and construct roads that do condemn property that would be a Section 4(f) taking, as well as may not be bound by mitigation measures identified and agreed to.

By dividing the project into two zones of responsibility, with the County not bound by the planning of the City and TDOT, there is a foreseeable effect that adverse effects may be created by the County not implementing mitigation measures that the City and TDOT agreed to.

The functional plan from the planning phase, and the preliminary design have different designs at the Murphy Rd / Washington Pike intersection. The Preliminary Design presented June 30th does not have two right turn lanes from southbound Murphy Road to Washington Pike. The addition of these turn lanes was identified as a mitigating measure that would eliminate queuing in front of Murphy Springs Farm in the Historic Structures Report (p.36); this design does not include that mitigating measure.

The City and County should be jointly planning and designing it. The county needs to be involved, and required to commit to the same standards, planning, and mitigation that the City of Knoxville is committed to.

3.4 Lighting

No lighting plan was presented or discussed at the Design Review Meeting. Street lighting is an important aspect of the project, especially on a road that connects the urban interstate corridor to the Washington Pike Rural Heritage Corridor identified in the Northeast Knox County Sector Plan. A large portion of the corridor is residential, agricultural, and semi-rural in nature, and it would be inappropriate to brightly light the length of the road project with traditional cobra-head light fixtures that radiate light in all directions.

Lighting must be designed to light up only the transportation area and not trespass into the adjacent property, especially residential or agricultural property. Photometric designs should be prepared that indicate the lighting of the project length and impact on adjacent properties, and a limit should be agreed to as part of the design phase, perhaps 0.1 footcandles allowed on adjacent properties. Other traffic control lighting, such as signal lights, road signs with yellow flashers, and others should be shielded to the extent possible from view from adjacent properties.

I do not consider my comments complete on this matter. I wish to see the lighting plan and have an opportunity to discuss it and submit comments on it.

3.5 Materials for Retaining Walls

The design of retaining walls – materials and aesthetics - were not addressed during the planning phase or in the streetscape plan presented at the Design Review meeting on June 30th.

Retaining walls proposed on Murphy Road in the functional plan and historic structures survey should be sympathetic to the rural, agricultural heritage of the adjacent historical resource. Potentially the walls should be constructed of locally available stone, and possibly using dry stone techniques. Steps should be taken to apply visual treatments to minimize the perceived length of the wall, whether vegetative, design, or other. The Tennessee State Historic Preservation Office, TDOT Historic Preservation Division, Knox Heritage, and historic planners at the Knoxville-Knox County MPC should be consulted to assist with the material selection and design of the walls.

Personally, I like the retaining wall depicted in the middle cross-section view of the Streetscape Plan that breaks height of the retaining wall into two pieces, with landscaping between the lower and upper sections. That's far more visually appealing than a single, tall retaining wall.

The other retaining walls should be made of materials that are not just flat, faceless concrete, but that reflect the character of the corridor transitioning from urban to rural (modern to traditional) areas. A cobblestone block feel, similar to a recent project in Hillsboro Pike, Nashville, might be appropriate.



Figure 7 – Cobblestone block used on Hillsboro Pike, Nashville

3.6 Required Utility Relocations and Impacts

No discussion was made in the Design Review meeting on how utilities would be moved and relocated. The preliminary documents shown at the Design Review meeting only indicate proposed right-of-way required by the City for the road, sidewalks and bicycle lanes. They do not show additional right-of-way that may be required by above-ground electrical and communications utilities, or below-ground water, sewer, and communication utilities.

The utility relocation plans are important for impacted property owners to understand the full impact on their property and livelihood. The preliminary design drawing may show a right-of-way taking of only 15 feet, but if an overhead electrical line must be relocated outside of that right-of-way, then the property owner will be further impacted. Trees in their front yard may be cut down and removed, which may remove all shielding between their house and the much busier road. Underground water and sewer lines may result in additional disturbance in their yards, and grading, which in combination with the road work may render the property undesirable and unusable.

I request that a preliminary utility relocation drawing, which explains the impacts to property owners, be created and provided to property owners before the right-of-way phase begins. It seems ridiculous to me that in the TDOT Locally Managed Projects Process Overview Flow Chart, the only Right-of-Way Public Meeting is held AFTER the design is certified and before utility consultants design their relocation plans.

If it is not possible to provide that preliminary utility relocation drawing before the right-of-way phase begins, then I request that it be made available and a public meeting held before the "Issue Notice to Property Owners" step is reached.

3.7 Varying Corridor Width

The following slide was presented at the May 21, 2012 Neighborhood Update meeting, and was the design that was "sold" to the neighborhood. Residents immediately asked how this could happen between the Target Center and the railroad tracks, and were told "we'll flesh all that out in design – a few sections may not support that section" which requires approximately 200 feet of right-of-way.



Figure 9 – Kingston Pike in Bearden.
Similar lane configuration as 55% of Washington Pike Project
Shawn Poynter, Knoxville Mercury

My rough measurements show that there is no median for approximately 55% of the project length; just a center turn lane. The remaining 45% of the project length has a much narrower median; of that, less than 1,000ft is a planted center median while the rest is a 2-4ft concrete median. That isn't what was proposed during the planning phase. The neighborhood was told one thing; something else is on the design document.

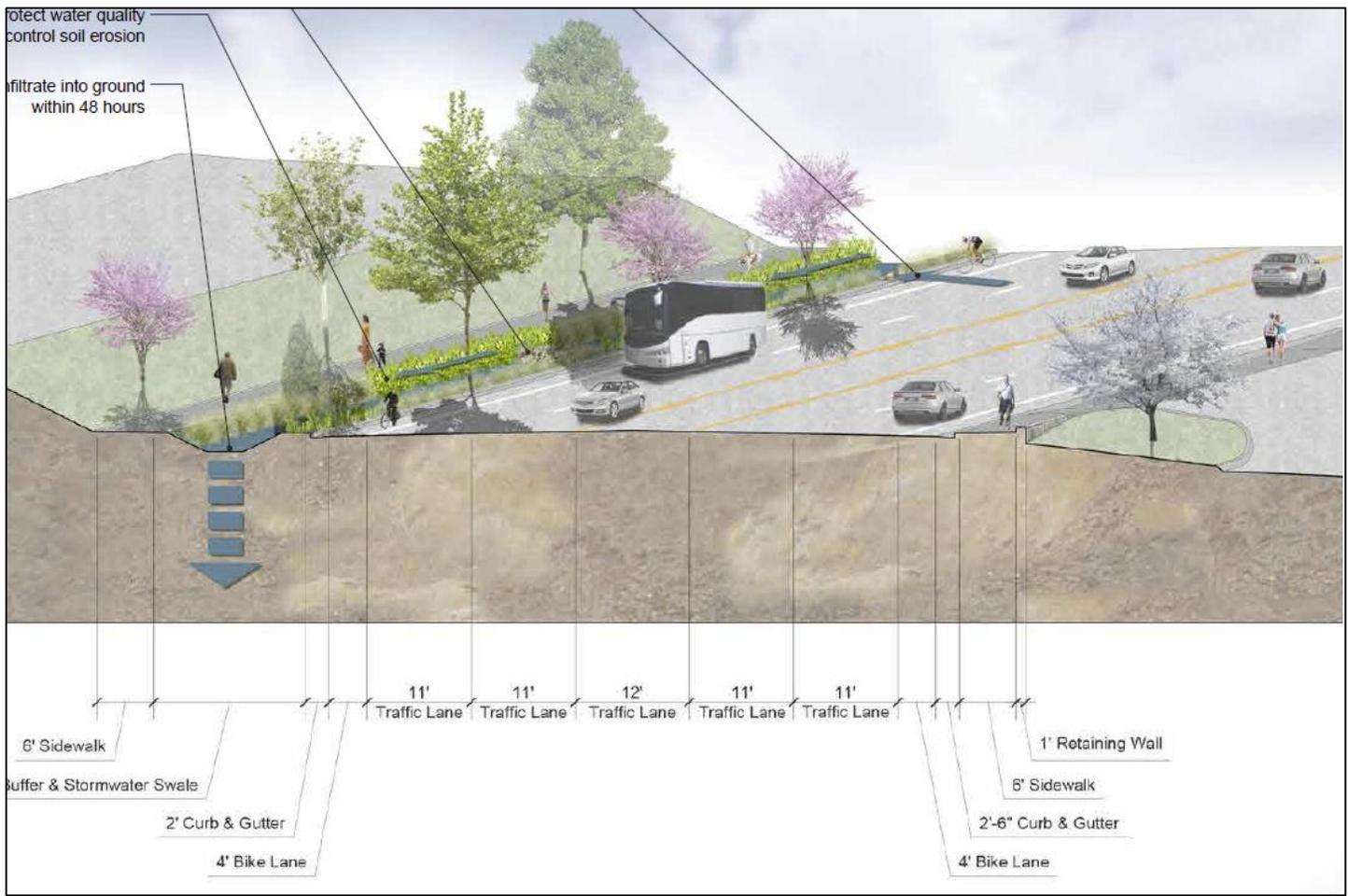


Figure 10 – Cross Section that applies to approximately 55% of project length. No median.

The planted medians should be continued through the entire length of the project. I noticed that no property was planned to be acquired from Target for additional right-of-way. Why is that? It's just parking lot up there; property should be acquired from that parcel in order to provide the width required for the Typical Section design shown at the meeting.

As an alternative, a two-lane design using roundabouts would not require a median for aesthetics. It could be nice, but not required.

3.8 Speeds and Speed Limits

I've heard that the posted speed limit will be 45mph for the project length, and I've also heard that the posted speed limit might be 40 mph. The Noise Technical Report was written with a design speed of 40mph and a posted speed limit of 35mph. No speed limit was included in the preliminary design discussed at the June 30th Design Review meeting, nor was a design speed posted on the document.

What will the posted speed limit be? What is the design speed of the project?

In my opinion, the five-lane design of Washington Pike will make it a raceway. I believe that many vehicles will travel at typical speeds of approximately 45-50mph. These faster speeds have an impact on noise, which was not accounted for in the technical report.

Traffic entering the corridor from either direction will desire higher speeds. Coming from the west, most of the traffic has been on the interstate and will desire a faster speed. Coming from the east, approaching traffic inbound on Washington Pike from the rural county travels at 45-55mph.

The use of roundabouts would slow traffic through the corridor – a roundabout at Murphy Rd / Washington Pike would slow all traffic down to corridor speeds, and the same would happen with a roundabout at the Greenway Drive intersection.

If roundabouts are not used, what other design features are available for bringing vehicle speeds into conformance with the project design speed?

3.9 Noise Design and Abatement

No noise abatement design was presented at the Preliminary Design Meeting. The Noise Technical Report, which I strongly believe needs to be redone, did not recommend any noise abatement measures.

I do not consider my comments complete on this matter. I believe that noise abatement needs to be included in the design. There should be a report on noise abatement aspects of the design, discussion, and an opportunity for public input and to submit comments.

3.10 Comments on Specific Parcels and Features

These comments are based on the preliminary design Public Hearing Display from June 30, 2015. It assumes the existing design. These comments may not be relevant for an alternative build design featuring roundabouts and narrower streets. I would like to make comments on that alternative design when it is available.

1. Eastern Target Shopping Center entrance

The east entrance to the Target shopping center (near New Harvest Park) should be a right-in, right-out only entrance. There should not be a left turn lane allowing vehicles to turn left (eastbound) from the Target shopping center. Vehicles that need to exit the Target shopping center and travel eastbound on Washington Pike (left turn) should use the left-turn at the shopping center's stoplight intersection with Greenway Drive.

Today vehicles turning left from the eastern entrance onto Washington Pike have limited sight distance. It will not be an easy turn to make with more lanes and faster moving traffic with a new road design.

Making this a right-in/right-out entrance could eliminate the need for the center turn lane for a long stretch of the road, and allow a planted median to be put into place.

2. New Harvest Lane entrance

Pavement markings for a right turn and left-hand turn should be marked for vehicles turning from New Harvest Lane onto Washington Pike. Since a sidewalk will be on each side, a crosswalk should be marked on this as well.

3. Acquiring R.O.W. instead of Slope Easements in Oak Grove and Beyond

The design of Washington Pike through Oak Grove residences to the west of Mill Rd depict cut lines and fill lines outside of the proposed right-of-way acquisition. My experience with the slope easements is that property owners are essentially deprived of the use of their property; steep slopes are difficult to maintain, vegetation is cleared, and the slope isn't an area that you can "use" in any manner. Parcels identified on the drawing as numbers 3, 8, 13-20, 23-26, 30-31, 33, 39-40, and 47 have extensive amount of their land outside of the proposed R.O.W. as cut / fill area. The proposed R.O.W. should be acquired closer to these cut / fill lines. That is a better representation for these owners to understand what the real impact is on them. Most of these owners do not have steeply sloped land like what will be created during cut / fill operations. If the city needs to cut and fill to put in the road project, then the city should acquire the property and maintain it, and not shift the burden to the property owner, depriving them of significant use of their property, and forcing them to maintain it.

5. Mill Road Intersection

The intersection at Mill Rd and Washington Pike has two prevailing traffic patterns:

In the morning, traffic travels westbound on Washington Pike to the intersection. Approximately 2/3 of it proceeds straight through the intersection, while 1/3 turns left on Mill Road. The depicted left-turn lane from Washington Pike to Mill Road is not long enough to accommodate the traffic volume in the mornings; it will queue up back into the left-hand lane of traffic. The turn lane needs to be extended farther, which unfortunately removes the planted median.

In the evenings, there is a lot of traffic coming from Mill Rd and turning right onto Washington Pike. A right-turn bypass lane from Mill Road to Washington Pike would help the traffic from Mill Rd move quickly

onto Washington Pike. This would require a merge onto Washington Pike and further design work to accommodate 2 through lanes on Washington Pike and a merging right bypass lane from Mill Rd.

6. Babelay Road Intersection

The current design makes no improvements at the Babelay Road intersection. Today drivers have significant delays turning left (west) from Babelay Road onto Washington Pike. A roundabout would be useful at this intersection, and would help slow the flow of traffic down. A crosswalk should be marked on the pavement for pedestrians crossing Babelay Rd.

I'm afraid that without any additional improvements, within 10 years somebody will call for a stoplight at this intersection. That would place seven (7) stoplights on the 1.6 miles from I-640 eastbound to Murphy Road, which is undesirable.

7. Cul-De-Sac on the end of Trestle Way

Personally I like this design, which puts entering/egressing traffic onto Pullman Road. It seems like an elegant solution. I would want the old roadbed to be removed and landscaped, which it doesn't look like is in-scope for the current plan. The residents of these condos should be consulted as well.

There will be an undesirable side-effect of increased signal times needed at the Murphy Rd intersection to allow traffic to turn left from Pullman Way onto Washington Pike westbound.

8. Realigned McCampbell Drive

This looks OK to me.

9. Property #41 – Jerry Tipton Commercial Property

My opinion is that the taking boundary for Mr. Tipton's property, and dividing it into two, renders it unusable for the purposes it is currently zoned for and denies the owner the use of his property. An offer should be made to fully acquire this property from the owner at fair value.

By not performing a full-taking, the commercial interests able to use this small of a property would be very limited. They would not be able to have appropriate landscaping or parking. A billboard company could decide to use this property for an unsightly addition to the community. Creating two very small, separated commercial parcels that attract commercial businesses not in character with the neighborhood is exactly the kind of side-effects that have caused the project to be put on pause until a corridor overlay is completed.

A landscaping plan should be added to the design that reflects a full taking of this property. It could be used as a welcoming gateway to the Washington Pike Rural Heritage Corridor, with appropriate signage. A small park area for use by sidewalk users, with perhaps a few benches and sitting areas, might be added.

10. Property #49 – Anthony Bell Property

This property becomes severely constrained with required right-of-way takings, especially if the county upgrades Murphy Road and requires additional right-of-way dedication on the eastern side of the property. Given the constraints it has, the city should consider acquiring this property in whole. The current house has been unoccupied for at least 8 years, and the property has been on the commercial marketplace for almost 6 years with no development. It is an undesirable location with constraints, and could best be utilized by the public.

It could be used as a parking and access location for the proposed Murphy Creek Greenway in the *2010 Knoxville-Knox County Park, Recreation, and Greenways Plan*. The large area underneath the TVA and KUB high voltage transmission lines, which can't be used for building structures, could be used for parking lots. A small community park could be built as well, which would be a compatible use next to the historic farm to the east. This would be a positive impact of the project to the community, and support the goals of minimizing commercialization of the corridor and hurting the revalidation of the East Town Mall area.

Access from this property should be limited to right-in, right-out only entrances on both Murphy Road and Washington Pike due to the proximity with the busy intersection.

11. Property #47 - Gary & Katherine McCormick Residence

With the required cut line and right-of-way acquisition, this is a fairly substantial reduction of their property, which has been impacted previously by the Murphy Road widening in 1999. Full consideration of the reduced previously reduced use of the property and adverse impacts of traffic, noise, and light should be included in any proposal. A landscaping screen should be installed and maintained by the city to reduce the impact of introducing a second front yard on the side that faces Pullman Road (see below).

12. Murphy Road Intersection

As presented in the Preliminary Design, the proposed design does almost nothing to improve the poorly performing intersection. There is already a left-turn lane eastbound Washington Pike to Murphy Road which performs poorly in the afternoon and has insufficient left-turn storage length. This design, with only a single left turn lane with the storage same length as today, does nothing to alleviate this issue. There is no right-bypass turn lane from Murphy Road onto Washington Pike in the proposed design, which means traffic will continue to queue up on Murphy Rd past the railroad tracks during morning rush hour.

Marked crosswalks should be added to the intersection, with pedestrian crossing signals. Today there is pedestrian use from the residential subdivisions on Murphy Road to the convenience station at the intersection; making the road wider will increase the safety risks to pedestrians trying to cross a busier, wider street without pedestrian signals.

A roundabout would be ideal at this intersection, with a right-turn bypass lane from Murphy Rd to Washington Pike. The available property could be acquired from Property #49 on the northwest corner.

13. Pullman Road

There should be a landscaping screen installed between Pullman Road and Property #47 (Gary and Katherine McCormick).

Sidewalks should be installed on Pullman Road and Pullman Way as part of the project; no sidewalks are depicted on the preliminary design.

3.11 Recording of Zoning Ordinance Variances

Many property owners will have land acquired from them. As a member of the county BZA, I've seen a number of cases come up before us where a property owner had right-of-way acquired, creating a non-conforming lot where the building may have a front-setback or side setback less than the zoning ordinances require. Often banks require these to be brought into conformity if the property is sold and a mortgage is part of the sale; this necessitates that the property owner must

The City of Knoxville should file for variances with the City BZA and County BZA on behalf of affected homeowners. These variances could be conditioned to existing structures, to minimize unforeseen future consequences. This would "make right" an undesirable side effect of right-of-way acquisition.

3.12 Continuing Maintenance

The City of Knoxville should find recruit several businesses along Washington Pike to serve as Adopt-A-Road sponsors for the stretches of Washington Pike. Trash accumulation has been an issue on this road, and with additional traffic it will continue to be an issue.

Waste cans should be added at several points along the greenway and sidewalks.

3.13 Corridor Overlay (Zoning)

There was no corridor overlay design presented at the June 30th Design Review Meeting. As identified by the community and city officials, this is a critical aspect of the project to mitigate potentially harmful and unintended side effects of developing a road corridor. I support the development of a corridor overlay, desire to participate in the crafting of it, and believe that the project should not progress farther until the corridor overlay is in place.

3.14 Format of the Design Review Meeting

The June 30, 2015 Design Review Meeting had some good information available. I did not like that after the presentation, the breakouts were to small groups. I would have liked an opportunity to hear all of the concerns that other attendees had, and to add my voice to their concerns, or to propose alternatives when answers were provided. I would have like some interactive design sessions with the project staff on focus issues, and I believe there should be follow-up design sessions with the public and project staff.

4 Requested Follow-Up Actions

I believe these are the necessary follow-up actions:

1. Perform analysis and complete a "Build Alternative – Roundabouts" functional design that features roundabout designs instead of signalized intersections. I heard that CDM Smith was asked to model this. It needs to be done using CDM Smith personnel that are familiar with roundabout designs and have successfully implemented both single-lane and multi-lane roundabouts. No excuses if our local engineers haven't done that before; they're a big company and can call in resources from across the country to help.
2. Prepare updated draft versions of the Historic Structures Survey and Noise Technical Report that include both Build Alternatives (Roundabouts, and Signalized Intersections) and address the other concerns in sections 2 and 3. The Historic Structures Survey should use the correct boundaries for Murphy Springs Farm, and fully address the deficiencies called out above. It should analyze visual barriers and noise barriers, and the effects from both build alternatives. It should also address retaining wall design. We could work through these in a few collaborative tabletop sessions with minimal writing and updates required to the documents; I'd welcome a lighter-weight approach than massive revisions passing back and forth for review.
3. Hold a public meeting to present the roundabouts design. Accept comments from the meeting. The discussion format following the presentation should be a Q&A forum where everybody hears everybody else's questions and concerns, and the answers. If particular areas of concern are identified, follow-up detailed design meetings can be scheduled for these areas. A sense of the public's preference for each of the Build options (Roundabouts, Signalization) should be obtained, perhaps through an informal poll or vote.
4. Provide public comment periods for the revised Historic Structures Survey and Noise Technical Reports.
5. Once a build alternative is selected, publish preliminary noise, lighting, visual barrier, and retaining wall designs in addition to the preliminary design like shown at the June 30th meeting.
6. Hold a public meeting to review these preliminary designs. Same format as above – detailed concerns to be worked out.
7. Schedule quarterly working sessions with the neighborhood groups to cover corridor overlay planning, project design issues, etc.

There may be other ways to accomplish this. The most important things I would like to see are:

- A. Serious consideration of roundabouts, and an informed decision based on the tradeoffs. We need engineered models to provide information on noise to inform that decision.
- B. An updated, corrected historic structures survey.
- C. Appropriate mitigation measures put in place, which I believe have been glossed over.

5 Appendix A: Chronology of Murphy Springs Farm Boundary Determination

5.1 Summary of Events

I was contacted via phone on April 13, 2012 by Jana Bean, an architectural historian working for the project's prime contractor, CDM Smith, for information about the Murphy Springs Farm. That afternoon I provided Ms. Bean with a parcel map shaded to indicate included parcels and a boundary for the district.

I did not receive any written communication describing the process that was being undertaken, so on April 15, 2012 I sent a letter to Jim Hagerman, Director of Engineering for the City of Knoxville, identifying Murphy Springs Farm as a resource that should be considered as part of Section 106 analysis and requesting that an impact analysis be performed. I requested information on the traffic forecasting estimates, and to be notified of any public meetings on the project. This letter served as my request to be an "interested party" in the project communications, and especially regarding the historical survey process. I received a reply indicating that it was forwarded to the project manager.

Using formal Section 106 terminology, the letter on April 15, 2012 was my request to be a consulting party in the project due to my ownership of a resource eligible for listing on the National Register of Historic Places. I was never informed if I would or would not be a consulting party.

I later provided a very preliminary and incomplete draft of a nomination form on for the National Register of Historic Places to Ms. Bean on May 8, 2012. She followed up on May 9th for additional clarification, which was provided on May 13th.

I received no further communication about the survey or results from anybody for the rest of 2012, except for an email from Ms. Bean on Oct 8th enquiring if I had made progress on the National Register application. I replied that I had not.

An initial draft of the report was prepared by Ms. Bean and sent to TDOT in October 2012, without circulation to interested parties in the Knoxville area or the SHPO. The draft reports included the initial boundaries I had proposed for Murphy Springs Farm. TDOT staff (Tammy Sellers) commented that the boundaries were too large. Several discussions occurred between Ms. Sellers and Ms. Bean. By the final revisions in Jan 2013, the boundary was reduced to parcel 049 080.

The final report was then sent to SHPO staff, who reviewed it and concurred with it with minimal review and independent research. SHPO personnel were provided with only two sentences alerting them to any conflicting information regarding the boundary: "The current owner, Kevin Murphy, had previously proposed the boundary be based on lands acquired by the original owner, Robert Murphy, which would total 207.92 acres and encompass various adjoining parcels now owned by family members. Prior submittal of this report to the TDOT resulted in a recommendation that the boundary reflect only the parcel containing the Murphy Springs Farm house and outbuildings that were associated with farming activities through the dairying period, approximately the 1920s."

SHPO staff agreed that the farm was eligible on February 7 and 8, 2013.

I was never mailed a copy of the final report with the recommendation. When I was given a copy of the Murphy Springs Farm report by another recipient, I raised the boundary discrepancy to that recipient as well as increased traffic impact, lack of visual barriers, street lighting, and foot traffic. It was forwarded to TDOT and then the SHPO. SHPO staff (Claudette Steger) responded that they had worked with TDOT on the boundary, and that was the only issue she addressed. There were no further communications.

In spring 2014 I submitted a nomination to the Tennessee SHPO for Murphy Springs Farm to the National Register of Historic Places, and included all 205.75 acres of the farm. One week prior to the hearing at the State Review Board, I received a copy of a letter sent by SHPO staff to the Board members informing them of a boundary dispute.

At the September 17, 2014 meeting of the State Review Board, the review board recommended the nomination, the SHPO staff disputed the nomination, and the review board agreed to send it to the Keeper's office to determine the correct boundaries.

On December 16, 2014, James Gabbert, the Reviewer for Tennessee National Register nominations, returned the nomination with an adjusted boundary.

In February 2015 I submitted a revised nomination to the Tennessee SHPO. In the May 2015 hearing the State Review Board recommended the nomination. On July 14, 2015, Murphy Springs Farm was entered into the National Register of Historic Places with the revised boundaries.

5.2 Detailed Chronology of Events

I submitted an Open Records Request to the TDOT Historic Resources Office and the Tennessee Historical Commission for items related to Murphy Springs Farm, and combined them with my own records to develop this chronology of events. The numbers in the footnotes relate to numbered files submitted in comments to the Keeper of the National Register in December 2014. I can provide these files to you if requested.

1982-1984 – The Knoxville / Knox County Metropolitan Planning Commission conducted a historical and architectural survey of the county. It identified the Murphy House (KN-3586) as being eligible for the National Register⁵.

Sometime in 2000 – An architectural survey was conducted of the area as part of an Advanced Planning Report by Thomason and Associates. The survey recommended that the Murphy House was not eligible⁶.

November 2, 2000 – SHPO staff member Joe Garrison sent a letter to TDOT concurring that there were no historic or architectural resources located within the proposed Washington Pike project area⁷. (This includes the area that the Hugh Murphy House and Murphy Springs Farm are located).

January 2009 - several members of the SHPO staff visited Murphy Springs Farm to view the house and outbuildings. The scope of that visit didn't include the pasture areas, fields, or older family cemeteries – it was an initial determination about the significance of the house under Criterion C (Architecture).⁸

January 2009 – Unrelated to the above conversation - City of Knoxville issued a Transportation Planning Report for Washington Pike / Millertown Pike⁹. This was not provided to property owners in the area or community organizations. Page 35 of the report indicates that no National Register eligible sites were found during a preliminary investigation (the Thomason report in 2000). This calls into question the information provided to and used by planners, because Murphy Springs Farm was clearly eligible.

November 2011 – Kevin Murphy attended a dinner with Ann Bennett, Historic Preservation Planner for Knoxville / Knox County Metropolitan Planning Commission, and Patrick McIntyre, Executive Director, Tennessee SHPO. At the dinner, the idea of listing the entire farm on the National Register was proposed. Mr. McIntyre was receptive to the concept, however no documentation or written proposals were provided to him.

April 6, 2012 – City of Knoxville sent letters to property owners about survey crews for the Washington Pike widening project¹⁰. This was the first notification that the project was underway.

April 2012 – Jana Bean was hired as a historic resources consultant by CDM Smith, who is the project designer for the City of Knoxville's Washington Pike from I-640 to Murphy Road Project (TN-PIN 043090.00, Federal STP-M-9109(64)). Ms. Bean contacted Kevin Murphy by letter or phone message, and Kevin sent initial information about the farm on April 13, 2012¹¹.

April 15, 2012 – Kevin Murphy sent a letter to Jim Hagerman, Director of Engineering, a letter about the Washington Pike project, which contained preliminary information about the farm and parcels that comprise the farm that could be eligible for listing on the National Register and may impact a Section 106

⁵ 14 - Historic Structures Survey for Washington Pike Oct 2012 Draft.pdf, page 3

⁶ 14 - Historic Structures Survey for Washington Pike Oct 2012 Draft.pdf, page 3

⁷ 17 - Email from Joe Garrison to Jana Bean.pdf

⁸ 10 - SHPO Murphy Farm Email Correspondence 2008-2009.pdf

⁹ 11 - 2009-01-WashingtonMillertownTPR.pdf

¹⁰ 12 - 2012-04-06 Letter from City of Knoxville re Washington Pike Surveys.pdf

¹¹ 13 - 2012-04-13 Email from Kevin Murphy to Jana re Farm Map.pdf

review¹². Mr. Murphy requested to be included in public meetings on the project, and was unaware that the key words were "interested party" or "consulted party."

April 16, 2012 – Kevin Murphy and Jana Bean had a telephone conversation. Kevin followed up with information¹³ including a copy of letter to the City of Knoxville Engineering on April 15 2012 and an application to list Murphy Springs Farm in the Tennessee Century Farm program¹⁴.

May 1, 2012 – Knoxville Mayor Rogero invited to speak at an Alice Bell / Spring Hill Neighborhood Association regarding Washington Pike widening and other plans¹⁵. Mayor wasn't able to attend, but sent engineering staff and arranged for another meeting on May 31, 2012.

May 7, 2012 – Jana Bean enquired about what was being nominated (the promised draft of the National Register nomination had not been sent).

May 8, 2012 - The next day Kevin replied with the information and the draft¹⁶. The draft nomination did not contain any boundary description or justification text¹⁷.

May 9, 2012 – Jana Bean requested additional information on structures and cemeteries¹⁸ and referenced several sites outside of parcel 049 080¹⁹.

May 13 2012 – Kevin Murphy replied back with clarification information about the Koger house²⁰ and a tax map with figures²¹.

May 21, 2012 – Alice Bell / Spring Hill Neighborhood Association held a meeting with Northeast Knox Preservation Association discussing Washington Pike Widening. Staff from CDM Smith and City of Knoxville Engineering Department attended²². A presentation was made but no public comment forms were distributed and no avenue was provided for public comment.

May 31, 2012 – Knoxville Mayor Madeline Rogero met with Kevin Murphy, other community groups, and City Engineering to discuss the Washington Pike projects and other projects in that vicinity²³. Historic impacts were not specifically mentioned, but a need to work on other projects first was. Follow-up was supposed to occur from the mayor's office, but never did.

Aug 17 2012 – TDOT sent a letter to the Cherokee Nation about the project and asking if they wished to be an interested party²⁴. I have not been provided any other copies of letters or information on who was notified and given the opportunity to be an interested party. Knox Heritage, the property owners, Alice Bell / Spring Hill Neighborhood Association, and Northeast Knox Preservation Association were not notified.

Oct 8 2012 – Jana Bean requested progress update on preparing the National Register Application, and dates for a few structures. Kevin Murphy replied back on Oct 30th with dates for those structures, and that no progress was made on the application.²⁵ This exchange concluded the conversation between Kevin Murphy and Jana Bean.

Oct 2012 – Jana Bean sent the Oct 2012 draft "Historic Structures Survey for the Washington Pike Roadway Improvements Project" to TDOT's Historic Preservation Section²⁶. No cover letter or email was returned with the Open Records request. Murphy Springs Farm is described on pages 26-39. A proposed boundary of all the parcels (~205 acres) is described on pages 33-35. This draft was not provided to the property owners, SHPO, or local organizations – just to the TDOT Historic Preservation Section. It also notes on page 3 that an architectural survey by Thomason and Associates in 2000 recommended that the

¹² 14 - 2012-04-15 Letter on Washington Pike Widening.pdf

¹³ 15a - Email from Kevin to Jana re Information on Murphy Farm

¹⁴ 15b - Murphy Springs Farm Tennessee Century Farm Application.pdf

¹⁵ 16 - 2012-05-01 Email inviting Mayor Rogero to ABSHNA Meeting.pdf

¹⁶ 17a - Email from Kevin to Jana with draft NR nomination.pdf

¹⁷ 17b - 10-900 Draft Murphy Springs National Register Nomination 2012-May-8.pdf

¹⁸ 18a - Email from Jana to Kevin for Additional Info.pdf

¹⁹ 18b - murphy questions.pdf

²⁰ 20a - Email from Kevin to Jana.pdf

²¹ 20b - TaxMap of Sites.bmp

²² 23 - 2012-05-WashingtonPikeNeighborhoodMeeting.pdf

²³ 24 - 2012-06-02 Summary of meeting with Mayor Rogero.pdf

²⁴ 25 - Knox Wash Pike NAC Allen 8.17.12.pdf

²⁵ 26 -Email between Jana and Kevin 2012-Oct.pdf

²⁶ 30 - Historic Structures Survey for Washington Pike Oct 2012 Draft.pdf

Murphy House was not eligible, even though it was determined as eligible in a 1982-1984 architectural survey by the Knoxville / Knox County Metropolitan Planning Commission titled *Historic and Architectural Resources in Knoxville and Knox County*. The report contains an appendix that list interested parties, which includes Kevin Murphy. It also contains Kevin Murphy's letter to Jim Hagerman of April 15, 2012 as an appendix, and the Tennessee Century Farm's application for Murphy Springs Farm.

Nov 2012 – An edit copy of the Historic Structures Survey was sent from TDOT back to Jana Bean²⁷. The edits show that the TDOT staff objected to the proposed boundary (p. 33-37) and didn't think they are appropriate. The TDOT staff instructed Ms. Bean to "re-think realistic NR Boundary" (p.37)

Nov 27, 2012 – Email from Jana Bean to Tammy Sellers regarding Washington Pike Survey comments that were received in the mail on the 26th, with some initial information about the boundary decisions.²⁸

Jan 8, 2013 – Joe Garrison, TN SHPO sent an email to Jana Bean indicating that the SHPO concurred with the 2000 survey that there were no historic architectural resources located in the area²⁹. In this case, the survey, TDOT, and SHPO completely missed identifying Murphy Springs Farm, which the SHPO agreed with in Jan 2009 that it was eligible.

Jan 2013 – phone call between Jana Bean and Tammy Sellers (TDOT) that discussed a greatly reduced National Register boundary to be only the parcel that the farmhouse and outbuildings are on, referenced in an email from Jana Bean to Tammy Sellers on Jan 25, 2013³⁰.

Jan 25, 2013 – A revised Historic Structures report was sent from Jana Bean to Tammy Sellers (not included below due to file size; the finalized report is included and has very minor changes). Ms. Bean included the statement in an accompanying email that the NR boundary was greatly reduced to just a single parcel, and that the APE ("Area of Potential Effect") was not in the viewshed³¹.

Jan 29, 2013 – Ms. Sellers replied to Ms. Bean with minor corrections, and then said it would be sent to TN-SHPO as a draft with those corrections³².

End of Jan 2013 – the last set of revisions is made to the report; no other changes were made during future reviews³³. The final version of the report proposes a boundary of parcel 049 080 where the Hugh Murphy house and associated outbuildings sits. The final version of the report also stated that the report would be mailed out to the interested parties in the appendix, which included Kevin Murphy. CDM Smith, Jana Bean, the City of Knoxville never mailed out the report to that list of interested parties; TDOT mailed it to a different list in March. Regarding the boundary, it states (page 35):

"The current owner, Kevin Murphy, had previously proposed the boundary be based on lands acquired by the original owner, Robert Murphy, which would total 207.92 acres and encompass various adjoining parcels now owned by family members. Prior submittal of this report to the TDOT resulted in a recommendation that the boundary reflect only the parcel containing the Murphy Springs Farm house and outbuildings that were associated with farming activities through the dairying period, approximately the 1920s. This would put the period of significance for Murphy Springs Farm to be from 1841, the construction of the Hugh Murphy house, to the 1920s, which marked the end of continuous farming activity. After dairying activities ended, the farm was further subdivided among family member who began their own homes and farms"

Feb 5, 2013 – a memo is sent from TDOT to TN SHPO (Claudette Steger / Joe Garrison) with the report, asking for reviews and comments before it is submitted formally³⁴.

Feb 7, 2013 – email from TN SHPO (Claudette Stager) to TDOT (Tammy Sellers) that they agree with eligibility, and that she would give the report to Joe Garrison³⁵. "I did not read the report for Washington Pike all that closely since I just wanted to get it done and maybe look over the Chattanooga project. I

²⁷ 31 - Historic Structures Survey - First Draft-TDOT edits.pdf

²⁸ 32 - 2012-Nov-27 Email from Jana Bean to Tammy Sellers.pdf

²⁹ 33 - Email from Joe Garrison to Jana Bean.pdf

³⁰ 34 - 2013-Jan-25 Email Jana Bean to Tammy Sellers re Washington Pike Revision.pdf

³¹ 34 - 2013-Jan-25 Email Jana Bean to Tammy Sellers re Washington Pike Revision.pdf

³² 35 - 2013-Jan-29 Email from Tammy Sellers to Jana Bean.pdf

³³ 36 - 2013-01-WashingtonHistoricalStructuresSurvey.pdf

³⁴ 37 - Washington Pike Memo to SHPO, 2-5-13.pdf

³⁵ 40 - 2013-02-07 Email from Claudette Steger.pdf

might have charted some of the buildings or just looked at the area as a district...but I am not the consultant.”

Feb 8, 2013 – Joe Garrison initialed the Feb 5 draft memo as “NAE JG 2/8/13” for “no adverse impact”³⁶. The note indicates that Jana was emailed on Feb 15 2013.

March 4, 2013 – letters were sent to the TN SHPO requesting comments, as well as to parties interested in historic preservation interests³⁷. Note: Kevin Murphy and the Northeast Knox Preservation Association were **NOT** included on that list of interested parties, although they were included in the list of interested parties in the Historic Structure Report.

March 12, 2013 – Patrick McIntyre, TN SHPO, sends a letter concurring that an eligible National Register of Historic Places resource, Murphy Springs Farm, is in the project area and will not be adversely impacted³⁸.

Apr 8, 2013 – Kaye Graybeal, Historic Planner at Knoxville / Knox County Metropolitan Planning Commission, emails Kevin Murphy about a Historic Structures Survey. Kevin asks for a copy, and expresses a desire to comment. Ms. Graybeal responds that they only have a hard copy, and that comments should be sent in this week³⁹. This was the only notification that Mr. Murphy ever received that the report was published. Note that he was not provided with a copy of the cover letter from the consultants until he submitted Open Records Requests in Sept 2014 to TDOT and the Knoxville / Knox County MPC. The cover letter would have informed him of the review process and guided him to the ACHP website to learn how to participate in the process.

April 9, 2013 – Kaye Graybeal advised Mr. Murphy to view the design drawings with city engineering, and then write a letter to TDOT or TN-SHPO⁴⁰.

April 12, 2013 – Kevin Murphy wrote preliminary comments to Kaye Graybeal, expecting Ms. Graybeal to reply with perspective before he wrote letters to TDOT and the SHPO. Instead, Ms. Graybeal forwarded the comments to TDOT, and the SHPO. Tammy Sellers (TDOT) replied that she would be coordinating with the SHPO. Ms. Graybeal sent the comments to the SHPO. The SHPO replied back that they had worked with Tammy Sellers on the boundaries for the report, and that when they had previously met with Mr. Murphy they had not set boundaries but suggested the house and outbuildings.⁴¹ Mr. Murphy took this as a final dispensation from the state, and that he would have to work with the report writers at the City of Knoxville. He was not aware that there was a SHPO and TDOT-led review process underway with a comment period; he thought the controlling agency was the City of Knoxville.

April 17, 2013 – Kevin Murphy sends a letter to Mayor Rogero, City of Knoxville, requesting an update since nothing had occurred since May 31, 2012. He explicitly requested key points for public meetings to be identified and that timelines for those public meetings be constructed.⁴²

May 13, 2013 – City of Knoxville sends a response to Mr. Murphy and community representatives⁴³. They were informed that the project was not moving rapidly and that no comments were currently required by law or city commitment to public participation. They indicated a public meeting would be done during the Final Design Phase after the Environmental Phase was completed. The city also stated that according to TDOT, copies were mailed to Mr. Murphy and Northeast Knox Preservation Association. Neither Mr. Murphy nor NEKPA⁴⁴ received these even though the addresses were correct, and it’s unclear where the city received this information.

³⁶ 41 - 2013-02-08 SHPO Ok onDraft.pdf

³⁷ 42 - 2013-Mar-04 Consultant Cover Letters.pdf

³⁸ 43 - 2013-Mar-12 SHPO OK with WashingtonHistoricalStructuresReport.pdf

³⁹ 44 - 2013-Apr-08 Email about initial notification.pdf

⁴⁰ 45 - 2013-Apr-09 Email Kaye Graybeal to Kevin Murphy.pdf

⁴¹ 46 - Emails from Kaye Graybeal Fwd_ Washington Pike Roadway Improvement Project in Knoxville.pdf

⁴² 50 - 2013-04-17 Letter to Mayor Roger re Washington Pike Widening.pdf

⁴³ 51 - 2013-05-14 City of Knoxville Washington Pk Response.pdf

⁴⁴ 52 - Email from NEKPA confirming non-receipt of report.pdf

6 Appendix B: Murphy Springs Farm Return, Dec 2014



Murphy Springs
Farm return.pdf

7 Appendix C: Murphy Springs Farm National Register of Historic Places Nomination

Entered into the Register July 2015.



TN_Knox
County_Murphy Spr

8 Appendix D: Washington Pike Rural Heritage Corridor

From the 2003 Northeast County Sector Plan



Washington Pike -
A Rural Heritage Corridor

9 Appendix E: Ritta A Neighborhood On the Rural Fringe

From the 2003 Northeast County Sector Plan



Ritta - A
Neighborhood on tl