



October 8, 2010

**Harvey Broome Group, TN Chapter
Robin Hill, Chair
11504 Mountain View Road
Knoxville, TN 37922**

**Knoxville/Knox County Metropolitan Planning Commission
Suite 403, City/County Building
400 Main Street
Knoxville, Tennessee 37902**

Hillside and Ridgetop Protection Plan Draft (revised September, 2010)

Dear Commissioners:

The Harvey Broome Group, Tennessee Chapter of the Sierra Club welcomes the opportunity to provide comments on the subject draft plan on behalf of our 1,100 members residing in the Knox County area.

We wish to commend the members of the Task Force for their dedication and efforts in drafting this plan in what was undoubtedly a lengthy and sometimes contentious process.

We believe the plan is a good first step towards assuring the preservation and protection of some of the last remaining green spaces in Knoxville and Knox County. However, we believe it is only a first step, and hope and expect that in the future the City's and County's hillsides and ridgetops will receive more comprehensive and effective protection.

The following comments apply to both the City of Knoxville and Knox County, although reference will be made only to Knox County for the sake of brevity.

As you know, Knox County lies in the Ridge and Valley Province bioregion of Tennessee. Because of the generally favorable soils and topography this region has historically been heavily exploited for its resources and for human developments. As a consequence, the originally rich and diverse fauna and flora of the region has been for the most part removed or destroyed. Those remaining representatives of our original biodiversity are primarily located on sites too difficult or expensive to develop, such as hillsides and ridgetops. As the plan points out, 50-60% of the forested land in Knox County is located on hillsides and ridgetops, while over the last twenty years almost 30,000 acres of forested land have been lost to development. Forested land provides not only protection for water quality and improved air quality, it is essential habitat for

most of our native plants and animals. If one defines a hillside as land with a slope over 15%, as the plan seems to, then only about 30% of the land in Knox County is considered to be hillside. Only about 14% of the land exceeds 25% in slope. Given the value of this sloping land in its natural state, both to its non-human inhabitants and to the residents of the county for the ecological and recreational services it currently provides and could potentially provide, it seems only commonsensical to us to find a way to preserve the ecological functions of the county's hillsides and ridgelines.

The way to do that is to keep the land from being developed. Period. We understand fully that most of this land is privately owned, and that government or the community has very limited abilities to restrict the rights of private property owners. That said, we suggest the city and county expand on the concept of urban wilderness being currently promoted on the south side of the Tennessee River by linking Forts Stanley, Dickerson, and Higley with a system of trails, greenways, and sidewalks in a natural setting. We agree with the recommendation to implement a system of ridge conservation corridors across the county as shown on the map on page 54 of the plan, but believe that map does not fully reflect the potential for corridors as shown on the map of forested slopes on page 2 of the plan. We also believe insufficient emphasis on the concept and potential benefits of a conservation corridor system is made by the plan. The analysis of Knox County's land use and the benefits to the community of preserving the hillsides and ridgelines presents a unique opportunity to bring before the county's and city's residents a vision of what this area could be if the public and private sectors work together to craft and implement a positive goal of a vibrant, healthy, environment for both its native life forms and people.

To this end, we strongly endorse the implementing mechanisms set forth on page 55 of the plan, which include both private donations and public funding to acquire for public use and enjoyment a sufficient amount of the remaining natural areas in the county to effectively preserve the ecological functions and communities of the county and to provide for its people means to have meaningful experiences in nature without having to travel for hours to state or national parks or national forests. We recommend and ask that the plan provide more emphasis and more specifics on "Implementing Public and Quasi-Public Corridor Efforts." This should be something that appears with emphasis in the preface and nearer to page 1 of the report instead of being buried on the last page. We further recommend the establishment of a follow-on task force to work on mechanisms and governance processes for establishing the desired corridors.

Sincerely,

Axel C. Ringe, Conservation Chair
Harvey Broome Group
Tennessee Chapter Sierra Club

cc: County Mayor Tim Burchett

Knoxville Mayor Bill Haslam