

Public comment regarding case **3-SB-21-C | O & 908 Blake Ln for Innsbruck Farms proposed development plan**

I, Kevin Broyles and my family, current residents of this area, am not opposed to any development of the proposed Innsbruck Farms. I am opposed to the development as currently presented.

I and many community member attended meetings over the weekend of March 5<sup>th</sup>-7<sup>th</sup> 2021 where we were informed of the planned development including its scope and timeline. The apparent developer, a Mr. Christman, attended the meeting on the 6<sup>th</sup> and made his plans known. He took questions from the community, and even answered some of them. But many of his answers were along the lines of, “....well we will have to look at that and see if the numbers work.” Many of us left the meeting expecting that for some reason, the numbers would end up not working. Answers to some questions at times were in conflict to answers of other questions. The developer stated that the homes built would be marketed toward, “retirees looking to downsize from larger homes.” We were also told that there was expected to be a housing shortage in the area due to additional industry coming in and the people working there would need homes nearby. Perhaps he expects these retirees to go back to work after moving into the homes he builds. When asked why he could not make the building lots bigger and build fewer but nicer homes on the larger lots, we were told the homes would have to sell for more than the buyers would be able to pay. It seems that he expects the people selling their larger homes will suddenly become too poor to buy his smaller homes.

For most who attended the meetings, it was apparent that the timeline on the MPC decision was much shorter than would be expected for a development of this magnitude. Many expressed desire for a deferral of the decision until a more thorough review could be conducted with input from community sources that it seems has been avoided thus far. More than mere guesses, the community may commission its own traffic studies and seek other helps to facilitate professionally guided considerations.

It does seem that as presently planned, there is considerable community opposition to the development. I am among this opposition. If the development were substantially pared back, I believe much of the opposition would subside.

I base my opposition on the facts presented at these meetings and also on what I have been able to discern in looking at the concept report posted on the knoxmpc website for this development.

My opposition centers around 3 issues:

- 1) Traffic
- 2) Community safety
- 3) Community impact/quality of life

## **Traffic**

I reviewed the transportation impact study posted as part of the case file on the MPC website. The study was done by Ajax Engineering and paid for by the proposed developer. The study comes to several puzzling conclusions, but their conclusions do have the benefit (from the developer's perspective) of making the case that the development should cause minimal disruption to traffic flows.

It appears that about 60 pages of the study are not included in the material posted on the MPC website. The pages included are 1-3 and then 63-84. This omits about 70% of the study from public view. What is in the 70% the public can't see? Is this standard practice to only show less than half of a traffic study for a development? One cannot tell what was included or omitted in the study since over half of it is missing.

Regarding this study, it must be considered that during the period in which the study was conducted, Knox County, along with much of the country has been under duress from COVID restrictions. At times this has caused schools to close and travel to be restricted due to business, factory, restaurant, entertainment venue, and even church closures. Traffic flows during this period cannot be taken as "normal". As the pandemic fades and travel increases, what was measured as "normal" traffic flow will no doubt increase.

Traffic count projections for N. Ruggles Ferry Rd most recently showed about 2500 vehicle trips per day. The **additional** traffic the development would produce of over 4400 vehicle trips and would almost triple the daily vehicle volume on a road **currently** experiencing high delay times during morning and evening commutes. What's almost as bad, the additional traffic will be on N. Ruggles Ferry for most of its length, thus slowing traffic for a longer distance.

The development is to have 2 entrances from N. Ruggles Ferry Pike. N. Ruggles Ferry Pike is a 2 lane road with a 40mph speed limit and frequent travel by farm tractors and implements during the growing season. The DOT signs showing the silhouette of a tractor are posted on this road.

The Ajax study projects an *additional* 4420 trips on the average weekday. As someone who travels N. Ruggles Ferry on a daily basis at various times, I can tell you it seems that the *current*

traffic volumes are a challenge for the road's capacity. This is confirmed in the report in that of the recommendations the plan makes on pages 2 and 3, almost 1/3 are recommendations are determined to be needed immediately for the *current* traffic. As excerpted from the Ajax study page 1, "The two intersection ends of North Ruggles Ferry Pike at Asheville Highway and Andrew Johnson Highway were examined in the study. Both have been calculated to operate with **high vehicle delays currently**. Without modifications at these intersections, they are also **projected to operate very poorly in the year 2028.**"

Pages 4-62 of the Ajax traffic study do not appear in the case documents for this development on the MPC website and their omission is puzzling. But it is stated on page 63 of the report, "Overall, North Ruggles Ferry Pike's minor approaches at Asheville Highway and Andrew Johnson Highway currently operate with high vehicle delays. The requirement of increasing the tabulated traffic volumes by 20% and distributing all generated trips to each end of North Ruggles Ferry Pike at Asheville Highway and Andrew Johnson Highway resulted in worse Levels of Service and extreme vehicle delays in the projected conditions."

The Ajax study makes no mention of additional traffic from delivery vehicles (FedEx, UPS, food delivery services, etc.) Certainly an almost 500 home development will have this additional traffic.

Numerous subdivision traffic variances are required, apparently to allow the homes to be packed as closely together as possible given the grade of the terrain.

Numerous roadway improvements are recommended to the interchanges of Asheville Hwy. and AJ Hwy. with N. Ruggles Ferry Rd. These improvements will be made when and at whose expense? No mention is made of improvements to feeder roads. Pleasant Hill Rd., Cash Rd., N Wooddale Rd., Arms Rd. and Molly Bright Rd. were not studied as feeder roads and so no impact to traffic flow on these roads is projected. Was this reasonable?

20 named roads turn off N. Ruggles Ferry between its intersection with Asheville Hwy and Andrew Johnson Highway. Many of these feed existing neighborhoods and have cars turning off/onto N. Ruggles Ferry at morning/afternoon drive times. With the increased traffic flow, were any recommendations made concerning the addition of lanes for traffic turning left (across traffic) off N. Ruggles Ferry onto these roads? If there are no turn lanes, traffic turning left will either back up (causing increased rear-end collisions) or turn across oncoming traffic and get t-boned. For many months of the year, there are dense morning fogs covering much of Ruggles Ferry due to the parallel course of the Holston River. This additional challenge will add to the danger the increase traffic flow will bring

No proposal is seen for widening of N. Ruggles Ferry Rd. to allow for increased traffic. This admittedly would be challenging in multiple areas since it is bounded at times by a cemetery

(difficult to relocate) and homes on opposite sides that are already too close to the existing 2 lane road surface to give up any land for widening.

Did the study give any consideration to the increased traffic flow on Asheville Hwy at the E. Gov John Sevier Hwy intersection? As there is no I-40 exit for Gov John Sevier Hwy., I-40 traffic must use Asheville Hwy from the exit 394 ramps for access to Gov John Sevier Hwy. Much of the traffic traveling this stretch of Asheville Hwy is bound for Gov John Sevier Hwy. At the intersection of Asheville Hwy and Gov John Sevier Hwy, collisions are frequent and sometimes fatal. Increased traffic through this intersection should be considered for the safety of the community.

Although the traffic study apparently examined access to the development using the east and west intersections of N. Ruggles Ferry with Andrew Johnson Highway, it ignored the possibility of the use/overuse of Pleasant Hill Rd. Cash Rd. and N. Wooddale Rd. as travel routes. Anyone traveling Cash Rd. is treated to a drive like a roller coaster with blind hills, driveways and mailboxes just over these hills, and speeding drivers despite these conditions since it is fairly straight. The use by additional traffic of Cash Rd. was mentioned only in passing in the traffic study. Pleasant Hill Rd. and Burrus Rd. have short radius curves plus blind hills and narrow roadbeds. Anyone traveling to points on Andrew Johnson Hwy. or Strawberry Plains Pk/I-40 between the eastern and western terminus of N. Ruggles Ferry will be traveling these 3 roads and no increased traffic on these roads was considered in the study.

A number of area residents enjoy bicycling/walking on these roads for exercise and enjoyment. With the increased traffic these roads will no doubt experience, this will become much more hazardous and people will likely die as a result.

## **Safety**

Unless you are a cattle rustler, cow fields are poor attractors of criminals. But when the concentration of people increases, crime increases. As long as we have lived here, there has never been an obvious law enforcement presence in this area. Primarily because this area has avoided being targeted by criminals. It isn't that crime has been completely eradicated here. It just seems that criminals want to concentrate their efforts in areas with more potential targets. With the addition of this many homes in a heretofore largely rural setting, crime will likely increase for area residents since we will have many more potential targets to select from. And being about 5 miles out N. Ruggles Ferry from the Asheville Hwy intersection, it will take law enforcement longer to arrive. Does the sheriff's dept. have extra deputies to move around to keep this area more frequently patrolled or would they have to add staff and patrol cars?

There are numerous variances requested for the road design standards in the development. Do these variances sacrifice the safety of pedestrian and bicycle traffic in the development to achieve more dense packing of houses?

The traffic flow study of N. Ruggles Ferry took only vehicular traffic into account. Ignored were pedestrians, bicyclists, agricultural equipment traffic, and even at times people riding horseback.

None of these users of the road would fare well under the increased traffic flows the study forecasts.

The frequent morning dense fog blanketing much of the N. Ruggles Ferry roadway will only exacerbate the problems increased traffic will bring and make driving during those times even more hazardous than now. During the school year, children often are waiting near the roadway for their bus. During the winter months, they are often waiting in low light conditions. Add fog and many more cars hurrying to work and you have a bad mix from a safety perspective.

### **Community Impact/quality of life**

During the community meetings, it was stated that there are about 720 current dwelling units on N. Ruggles Ferry and in the neighborhoods that line it. As the Innsbruck Farms development plan is presently planned, an additional 482 dwellings would be added. This is a 60% increase in this one development and will be under current rankings the **largest housing development in Knox County history**.

It is not possible to increase by 60% the number people living off N. Ruggles Ferry, especially when concentrating them as the development proposes, without drastically altering the rural setting that has attracted many of those who have lived here for many years.

The developer proposes development over 6 phases of 482 housing units. We were told the projected time to completion is 10 years. Today, this is an area where one can go outside and enjoy the sounds of the wind, the birds, and an occasional barking dog. This will be replaced for those unfortunate enough to live near the development by 10 years of M-F, 8a to 5p bulldozer, backhoe, and nail gun noise. After the development is complete, the bulldozers and backhoes will be replaced by mowers and blowers. Almost 500 of them.

The picture in the traffic study done by Ajax shows a view looking down Blake Ln as it passes Ruggles Ferry Baptist Church. From the picture, it looks like the proposed widening of Blake Ln would require the seizure of much of the church's current parking area.

This is hard for some to understand, but for most people currently living in this area, West Knoxville is not a place they would want to live. It's a nice place to visit, but we wouldn't want to live there. Many who have moved here over the years were former West Knoxville/Knox County residents who were looking for a place to get away from the traffic, noise, and crowds and find a place still in Knox County with less traffic, less noise, and a more serene lifestyle. This development at the size it is proposed will transplant to this community many of the things people who live here purposely moved away from. Even newer residents living here have invested much of their life savings and taken on debt to buy larger lots (at least an acre and often more) where they can be a little further from crowded conditions, have more room to build and maybe have a garden, and in general have a more peaceful lifestyle. If this development goes through as currently proposed, it may change the local environment to the extent that it drives current residents out of Knox County. But maybe that doesn't matter to the MPC. Anything for more money. Current residents be damned.

Given the composition of the MPC board is over 70% people working in various aspects of the real estate development/construction/sales/financing industry, I pray for a fair decision unbiased by business relationships, personal opinions, and profit potentials. This development is too large for this area at the present time. If **YOU** lived in this area, you would agree.

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