

Cover Note to Planning Commissioners and Planning Staff

July 16, 2026

Commissioners and Planning Staff,

Thank you for your service and for the time you are devoting to Case 7-B-26-UR. I respectfully submit these supplemental comments for the public record because this application raises issues that extend beyond routine quarry operations. It involves a proposed expansion east of Graybeal Road, the potential closure or relocation of a public road, nearby residential development approved since the prior 2009 review, adopted land use and transportation planning documents, and long-term compatibility questions that will affect residents, the applicant, and Knox County for decades.

I submit these comments as an affected resident of Buttermilk Road, as a citizen representative of CARE, Citizens for Accountable Review and Engagement, and as an engineer and corporate executive who has spent more than 30 years working on power, infrastructure, industrial, and public-interest projects. I have lived at 12605 Buttermilk Road since 2003, and my history with Dixie Lee Quarry is both personal and professional. I understand that aggregate is important to roads, bridges, utilities, schools, hospitals, homes, and economic growth. I also understand that large industrial and infrastructure decisions must be evaluated carefully when they affect established communities.

My purpose is not to oppose quarrying as a land use in general or to suggest that Vulcan Materials is acting improperly. Dixie Lee Quarry has operated in this area for many years and provides material that supports regional infrastructure. CARE's approach has been to engage Vulcan respectfully and constructively while also communicating the community's serious concerns about compatibility. CARE's objective is not to attack Vulcan or Knox County, and it is not to make unsupported accusations. CARE's objective is to be factual, respectful, organized, and useful to the public process.

CARE is also continuing to engage directly with Vulcan and to look for practical ways to address community concerns. If this expansion is ultimately approved, CARE wants the resulting conditions, mitigation measures, monitoring, communication commitments, and road decisions to be as protective, practical, and enforceable as possible. At the same time, CARE believes it is appropriate to state clearly that many residents do not believe the expansion east of Graybeal Road has yet been shown to be compatible with the residential community that exists today.

I also worked with Vulcan and the community during the 2009 review process, when Graybeal Road became an important boundary and part of a practical compromise. At that time, land east of Graybeal Road was not approved for quarry use, and any future quarry-related use of that land was expressly reserved for a separate Use on Review. That separate review is now before the Planning Commission, Planning Staff, and ultimately County Commission.

The community today, however, is not the community of 2009. Since that time, Hardin Valley has changed substantially. New homes have been built. New neighborhoods have been approved. Hickory

Meadows now exists. Other residents live near the proposed expansion who were not part of the 2009 process. Transportation planning has advanced. The Hardin Valley Mobility Plan has identified the Graybeal Road and Buttermilk Road area as needing transportation improvements, not elimination of public connectivity. These changes matter because the Use on Review criteria must be applied to the community that exists today, not only to the quarry's historic operation.

The adopted planning maps appear to reinforce this same point. The Future Land Use Map does not appear to show the land east of Graybeal Road as a future industrial or mining area. Rather, the surrounding area east and north of Graybeal Road appears in a rural and Rural Living planning context, while the existing quarry area is reflected separately as mining or heavy industrial. The Growth Policy Plan map likewise appears to place the area in a Planned Growth Area, not an industrial expansion area, and the current zoning map shows the subject area in the Agricultural zone, with nearby residential planned development approvals and rural residential uses surrounding it. These maps do not by themselves decide the Use on Review application, but they are highly relevant to the compatibility analysis. If quarry operations are to be expanded east of Graybeal Road, the record should explain how that expansion is consistent with the County's adopted land use planning framework and why Graybeal Road should no longer function as the practical boundary between the quarry and the rural/residential community.

One of the central Use on Review questions is whether the proposed use is compatible with the character of the neighborhood where it is proposed. Planning Staff's report already acknowledges the tension in this case by stating that "mining and extraction, while not generally compatible with surrounding residential development, already exists at this location." I respectfully believe that statement requires further analysis. The fact that quarrying already exists west of Graybeal Road does not, by itself, answer whether quarrying should now be expanded east of Graybeal Road, closer to existing homes, newly approved subdivisions, and areas Knox County has recently reviewed for residential growth.

Stated simply, if mining and extraction are not generally compatible with surrounding residential development, the record should explain how moving quarry operations closer to residential development makes the use more compatible, or what additional enforceable conditions are necessary to make the proposed expansion acceptable under the Use on Review standards.

The question is not simply whether mining may be considered by Use on Review in the Agricultural zone. The question is whether this specific expansion, in this specific location, is compatible with the character of the neighborhood and with the adopted planning framework. The Future Land Use Map, Growth Policy Plan, current zoning, recent residential approvals, and Hardin Valley Mobility Plan all appear to point toward continued rural/residential planning east and north of Graybeal Road, not an eastward migration of quarry operations toward existing and approved homes.

Planning's own Administrative Rules reinforce the importance of this broader review. Staff review of a Use on Review application is to include the effect of the proposal on the subject property, surrounding property, and the community as a whole, as well as conformity with the applicable zoning ordinance and applicable plans. The Planning Commission's bylaws also require Commissioners to consider Staff

reports, zoning standards, interested-party comments, and all applicable plans and formal policy statements. Accordingly, the Comprehensive Plan, the Hardin Valley Mobility Plan, recent residential approvals, the Future Land Use Map, the Growth Policy Plan, current zoning, and the surrounding residential context are not collateral concerns. They are part of the required review.

For that reason, I respectfully ask that the revised Staff Report reflect more than the applicant's presentation of the project. Vulcan's public meeting was useful and appreciated, and Commissioners and Planning Staff who attended were able to hear the applicant's explanation of the proposal. However, that meeting was primarily a presentation of the proposed expansion and mitigation concepts. It was not the same as an independent Staff effort to gather, document, and evaluate the specific concerns of affected homeowners regarding blasting, vibration, dust, noise, wells, structures, outdoor use, emergency access, road connectivity, and neighborhood compatibility.

To my knowledge, there has not yet been an independent process in which Planning Staff interviewed or otherwise systematically collected concerns from nearby homeowners and residents most directly affected by the proposed expansion. I respectfully submit that this would be valuable before final action is taken, particularly because the Use on Review standards require consideration of surrounding property and the community as a whole.

In my professional work, I help evaluate and make decisions on large infrastructure and industrial projects. Not every concern means a project must stop. But when a community raises serious concerns, the right response is not to rush past them. The right response is to listen, educate, evaluate, modify where appropriate, and build a record that people can understand, even if they do not all agree with the final outcome. That is the purpose of this submission.

Planning's Administrative Rules for street and alley closures also require Staff to evaluate present use, future needs, the necessity of the right-of-way to the overall street and road network, and the effect of closure on adjacent properties. In addition, Planning's traffic-study guidelines state that traffic studies are intended to assess compatibility with local transportation plans and help appointed and elected officials understand the implications of their voting decisions. These provisions support a broader review of Graybeal Road than short-term intersection delay alone.

Based on the record available to date, my own preference is that the proposed quarry expansion east of Graybeal Road not be approved because I do not believe the applicant has yet demonstrated that the expansion is compatible with the residential community that exists today. However, if Planning Staff or the Commission reaches a different conclusion, I respectfully ask that any approval be based on a complete, independent, and well-documented Use on Review analysis. That analysis should address the County's own approval criteria, adopted plans, surrounding residential development, public-road impacts, emergency access, and enforceable mitigation conditions. It should not rest primarily on applicant-prepared materials or on the fact that quarrying has historically occurred west of Graybeal Road.

This is not a request for the Commission to disregard Vulcan's history, property ownership, or operational importance. It is a request for the Commission to apply the Use on Review criteria to the community that exists today, including the residential development, transportation planning, emergency-access needs, adopted land use maps, and neighborhood character that have changed substantially since the 2009 review.

This is a long-term decision. The proposed expansion, if approved, could affect the surrounding community for the next 20 to 50 years. Residents are still working to understand the proposal, separate fear from fact, identify legitimate concerns, and engage with Vulcan and Planning Staff in a constructive way. Vulcan has had significant time to study, prepare, and develop this proposal with professional assistance. The surrounding community has had only a short time to become aware of the application, organize, review the record, and participate meaningfully in the process. I respectfully believe the community should be afforded sufficient time for its concerns to be heard, documented, evaluated, and addressed before an irreversible decision is made.

I respectfully ask that the Commission consider this memorandum as a request for a complete and well-documented review. Where the application can be approved with appropriate conditions, those conditions should be clear, measurable, and enforceable. Where additional information is needed, that information should be provided before decisions are made.

Respectfully,

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Individual resident and citizen representative, CARE
Citizens for Accountable Review and Engagement

Supplemental Planning Review Comments

Case 7-B-26-UR

Vulcan Dixie Lee Quarry Expansion and Graybeal Road Closure or Relocation

Submitted to:	Knoxville-Knox County Planning Staff
Attention:	Mike Reynolds, Planning Staff
Submitted by:	Dr. Thomas Keith Kirkpatrick, 12605 Buttermilk Road, Knoxville, Tennessee 37932
Capacity:	Individual resident and citizen representative, CARE, Citizens for Accountable Review and Engagement
Date:	07.15.26

This memorandum is submitted to supplement prior public comments and to assist Planning Staff in preparing a complete revised Staff Report and public record for Case 7-B-26-UR. The purpose is not to oppose quarrying as a land use in general, or to create unnecessary delay. The purpose is to identify ordinance, adopted-plan, transportation, public-safety, and condition-of-approval issues that should be addressed before the application proceeds further.

1. Executive Summary

The current application is not a routine operational adjustment. It would authorize mining and mineral extraction east of Graybeal Road, incorporate the remaining approximately 57.8 acres of Vulcan-owned land, and rely on either the vacation or relocation of a public road to create a contiguous amended quarry permit area. Staff has recommended approval subject to conditions, but several issues require further clarification and stronger conditions before the Planning Commission and County Commission act.

The principal requests are as follows:

- Evaluate the application under the full Use on Review standards, not only the numerical setback provisions of Article 4.50.02.
- Address the Hardin Valley Mobility Plan directly, especially Safety Project S-2, which identifies improvements or realignment for the Graybeal Road and Buttermilk Road area but does not identify road closure as an adopted plan option.
- Clarify that Graybeal Road is integral to the application because the applicant states that closure or relocation would release the current road surface and allow the expansion to become contiguous with the existing quarry operation.
- Require a transportation and public-access review broader than short-term level of service and intersection delay. The review should address future connectivity, emergency access, school traffic, route redundancy, and long-term growth.
- Add enforceable conditions preventing mining, pit development, overburden removal, material placement, berm construction, blasting, or other quarry operational activity east of existing Graybeal Road until the road issue is resolved and a final concept plan is reviewed.
- Strengthen monitoring, reporting, blasting, air quality, stormwater, berm design, and complaint-response conditions so that the record shows how neighboring interests and public health and safety will be safeguarded.

Requested Staff Action

- Revise the Staff Report to address the issues in this memorandum.
- Provide written clarification on the ordinance interpretations and conditions before the continued hearing.

- Consider replacing conditional approval with postponement or strengthened conditions if the Graybeal Road issue remains unresolved.
- Add a dedicated residential compatibility and community-character analysis that addresses the surrounding Rural Living and Planned Residential context, recent residential approvals, and the human impacts of long-term quarry expansion adjacent to existing and developing neighborhoods.

2. Key Background Facts Relevant to Review

Based on the current Staff Report, Vulcan application materials, the Knox County Zoning Ordinance, the Hardin Valley Mobility Plan, and the 2009 Use on Review record, the following facts appear material to the review:

Issue	Planning Relevance
Current application	Case 7-B-26-UR seeks Use on Review approval for mining and mineral extraction expansion on approximately 60 acres east of Graybeal Road, south of Buttermilk Road. The property is zoned A, Agricultural, and is in the Rural Area under the Growth Policy Plan.
Surrounding land uses	Staff identifies rural residential and single-family residential uses to the north, single-family residential development under construction to the east, rural residential and agricultural land to the south, and existing mining and landfill uses to the west.
Road dependency	The Staff Report states that parcel 129 080 spans Graybeal Road and that expansion onto the east side would entail crossing the street with the operation. The applicant proposes closure of Graybeal Road or two relocation options. Staff notes that either relocation option or closure would release the land occupied by the current street surface and allow the quarry expansion to be on contiguous land.
Staff compatibility findings	Staff states that the proposed development may be inconsistent with Comprehensive Plan Implementation Policy 2 because expansion of quarry activity will produce smoke, noise, and vibrations on neighboring properties. Staff also states that mining and extraction are not generally compatible with surrounding residential development, although the use already exists at this location.
Applicant representation	The Plan of Operations states that the extension would be used exclusively for stone extraction, with no accessory buildings, structures, fixed production equipment, or lighting, and no change to customer truck traffic or public access.
2009 condition	The 2009 approval included a condition that land east of Graybeal Road owned by Vulcan was not to be used in any way associated with quarrying unless a separate Use on Review was approved permitting such use. That separate review is now before Planning Staff, the Planning Commission, and County Commission.

3. Use on Review Standards Require More Than Setback Compliance

Article 4.10, Section 2 of the Knox County Zoning Ordinance gives special consideration to uses permitted on review because they may be unique, require large land areas, be potentially incompatible with existing development, or have

effects that cannot definitely be foreseen. Mining and mineral extraction fit squarely within that framework. Numerical setbacks are important, but they are not the end of the analysis.

The Planning Commission must be guided by adopted plans and policies and by the general Use on Review standards. Those standards include consistency with adopted plans and policies, harmony with the purpose and intent of the zoning regulations, compatibility with neighborhood character, injury to adjacent property by noise, lights, fumes, odors, vibration, traffic congestion, or other impacts, substantial traffic through residential streets, and whether surrounding development creates an undesirable environment for the proposed use.

The current Staff Report acknowledges several facts that require deeper review under those standards. Staff states that the proposal may be inconsistent with Comprehensive Plan Implementation Policy 2, that smoke, noise, and vibrations will be produced on neighboring properties, and that mining and extraction are not generally compatible with surrounding residential development. These statements should not be treated as background observations only. They are directly tied to the Use on Review approval criteria.

Requested Staff Clarification

- Identify each Use on Review standard and explain how the application satisfies, fails to satisfy, or satisfies only with added conditions.
- Clarify whether Staff believes the proposed use is compatible with the neighborhood as it exists today, including Hickory Meadows and other recent residential development.
- Clarify how Staff reconciles possible Comprehensive Plan inconsistency with a recommendation for approval.

4. Article 4.50.02 Requires Safeguarding of Neighboring Interests and Public Health and Safety

Article 4.50 recognizes that mineral extraction is a basic industry, but it also recognizes that mineral extraction may seriously affect mined parcels and surrounding properties. Article 4.50.02 requires more than a dimensional site plan. It requires a Plan of Operations that provides adequate safeguarding and protection of neighboring interests and the general public health and safety, along with satisfactory truck and equipment routing and restoration planning.

This requirement is particularly important here because the proposed expansion is adjacent to existing and newly developing residential areas, is tied to a proposed public road closure or relocation, and involves overburden removal, pit development, drilling, blasting, haulage, stormwater management, and long-term reclamation. The proposed operations are not limited to a passive buffer area. They include activities that Staff already recognizes can produce smoke, noise, and vibration.

Staff should expressly determine whether the submitted Plan of Operations provides adequate safeguarding in all respects, not merely whether the drawing shows 100-foot, 200-foot, or 300-foot distances from certain boundaries.

5. Graybeal Road Is Integral to the Application

The Staff Report states that the road location is not part of the Use on Review application. However, the Staff Report and applicant materials also show that Graybeal Road is operationally integral to the application. The proposed mining area is separated from the existing quarry by Graybeal Road. The applicant proposes closure or relocation to avoid crossing the public street with quarry operations and to create a contiguous quarry area.

For that reason, the road issue should not be treated as collateral or deferred. A conditional Use on Review approval that assumes a later road vacation or relocation risks approving the quarry expansion before the public infrastructure question has been resolved. The public road issue affects transportation planning, emergency access, public

connectivity, physical layout, setbacks, buffers, stormwater routing, property access, and the final form of the mining operation.

Requested Staff Clarification

- State whether Staff would recommend approval if Graybeal Road remains in its current public alignment.
- State whether closure, relocation to Buttermilk Road, and relocation to Hickory Meadows Way are materially different from a Use on Review standpoint.
- State what quarry activities, if any, may occur east of existing Graybeal Road before County Commission acts on the road vacation or relocation.

6. Hardin Valley Mobility Plan Consistency

The Hardin Valley Mobility Plan should be central to the Graybeal Road review. The plan identifies Hardin Valley as a fast-growing area with new residential development, at-capacity schools, increasing congestion, and a need for additional roadway connections to serve future residents and relieve stress on the existing system. The plan also identifies the importance of roadway safety, congestion mitigation, school traffic, truck traffic, cyclists, and pedestrians.

Most importantly, the plan includes Safety Project S-2 for the Graybeal Road and Buttermilk Road area. S-2 identifies two options: a new northbound Graybeal Road alignment connecting to the intersection of Buttermilk Road and southbound Graybeal Road, or realignment of both Buttermilk Road and Graybeal Road intersections with additional sight-distance signage. The adopted mobility planning document identifies Graybeal Road as infrastructure to improve or realign, not as infrastructure to eliminate.

A traffic letter concluding that short-term redistributed traffic will not materially change intersection delay does not answer the planning question. Level of service is only one transportation measure. It does not resolve adopted-plan consistency, future network connectivity, emergency access redundancy, school traffic, route resiliency, or the value of preserving public right-of-way in a rapidly growing area.

Requested Staff Action

- Add a dedicated Hardin Valley Mobility Plan analysis to the revised Staff Report.
- Explain whether road closure is consistent or inconsistent with Safety Project S-2 and the plan goal of improving connectivity and safety.
- Request review from Knox County Engineering and Public Works, Fire/EMS, School Transportation, and emergency management before any road closure recommendation proceeds.

7. Limitations of the Submitted Traffic Letter

The Cannon & Cannon traffic letter appears to evaluate the proposed Graybeal Road closure primarily through existing conditions, redistributed traffic volumes, intersection capacity, and level of service. The letter concludes that closure between Buttermilk Road and Pittman Drive would not cause additional delay to the roadway network. That conclusion may be useful for a narrow traffic-operations question, but it is not sufficient for the broader Use on Review and public-road decision.

The public record should address at least the following additional issues:

- Future residential growth already approved or under construction near the site.
- School arrival and dismissal conditions, including peak school-period traffic.
- Emergency access, fire response, EMS response, law enforcement response, and evacuation or detour redundancy.

- Whether closure would shift traffic to other rural local roads or reduce alternate routes during incidents, storms, utility work, construction, or emergency events.
- Consistency with the Hardin Valley Mobility Plan and long-term network planning.
- Whether a public road should be vacated when an adopted plan identifies improvements or realignment in the same area.
- Whether the proposed private access for remaining western Graybeal properties adequately protects public services, deliveries, and emergency access.

8. Conditional Approval Before Road Resolution Should Be Avoided or Strictly Limited

Current Staff condition 8 states that a concept plan will be required if Graybeal Road is relocated. That condition is helpful but incomplete. It does not address what happens if the road is closed rather than relocated. It also does not prohibit operational activity east of existing Graybeal Road before the road issue is resolved.

A stronger condition is needed because the applicant seeks approval for quarry expansion that depends on future County Commission action concerning a public road. The Use on Review approval should not create practical momentum for road vacation before the road issue has been independently evaluated.

Recommended Condition

- No mining, pit development, overburden removal, material placement, spoilbank or stockpile placement, berm construction, drilling, blasting, internal haul-road construction, vegetation removal for quarry operations, or other quarry operational activity shall occur east of existing Graybeal Road until County Commission has resolved the Graybeal Road vacation or relocation issue and Planning Staff has reviewed and approved a final concept plan showing the approved road condition and all related setbacks, buffers, berms, stormwater features, access controls, and operational limits.
- If Graybeal Road is not vacated or relocated, any Use on Review approval shall be returned to Planning Staff, the Planning Commission, and County Commission for review of a revised Plan of Operations before any quarry activity east of existing Graybeal Road begins.

9. Ordinance Interpretation Issues That Should Be Clarified

The current application uses terms such as overburden removal, pit development, material placement, buffer, berm construction, and quarry extension. These terms matter because Article 4.50.02 imposes specific restrictions on excavation, overburden, spoilbank, stockpile, buildings, equipment, roadways, and operations in a nonindustrial zone.

Before approval, Staff should clarify how the ordinance applies to each major activity and physical feature shown in the Plan of Operations. This is especially important because the preliminary drawings include proposed overburden removal and pit development areas, material placement and buffer areas, and vegetated berms near residential properties and public right-of-way.

Topic	Requested Clarification
Excavation	Does Staff interpret excavation to include overburden removal, pit development, drilling, blasting, and removal of topsoil, clay, weathered rock, shale, dolomite, limestone, or other earth materials in the extension area?
Overburden, spoilbank, stockpile, and material placement	Does Staff interpret proposed material placement, berm material, spoilbank, stockpile, or overburden storage to be subject to the 100-foot limitation from relevant property lines unless written consent or another ordinance exception applies?

Road right-of-way setback

How will the 100-foot setback from an existing or platted street, road, or highway be applied if Graybeal remains public, is relocated, is vacated, or becomes private access?

Berm construction

Is berm construction considered quarry operational activity, grading, overburden placement, or some combination? What permits and reviews apply before berm construction begins?

Performance standards

What baseline and ongoing information will be required to demonstrate continuing compliance with noise, vibration, dust, air quality, lighting, stormwater, and safety standards?

10. Recommended Additional Conditions of Approval

If Staff continues to recommend approval, the following conditions should be considered. These are intended to be practical, enforceable, and tied directly to the Use on Review standards, Article 4.50.02, and the public-interest concerns created by the road issue and surrounding residential development.

Recommended Condition	Purpose
Final integrated plan	Before any land disturbance east of existing Graybeal Road, require a final surveyed and engineered plan showing property lines, existing and proposed right-of-way, platted subdivision boundaries, dwellings, excavation limits, overburden areas, spoilbank or stockpile areas, berm toes and crests, haul roads, fences, gates, stormwater features, wetlands, streams, sinkholes, monitoring locations, and final buffers.
Road condition precedent	No quarry operational activity east of existing Graybeal Road until County Commission resolves the road issue and the final concept plan is reviewed for consistency with the approved road condition.
Mobility Plan consistency	Require a written transportation planning analysis addressing Hardin Valley Mobility Plan Safety Project S-2, future connectivity, emergency access, school traffic, route redundancy, and long-term growth.
Emergency services review	Require written review by Knox County Engineering and Public Works, Karns Fire Department or applicable fire authority, EMS, law enforcement, school transportation, and emergency management before any road vacation or relocation is relied upon for quarry operations.
Residential structure and well survey	Offer pre-activity surveys of residences, accessory structures, and wells within a radius determined by Staff, County Engineering, and a qualified blasting consultant, with consideration of the 2009 community concerns and current residential development patterns.
Blasting monitoring and reporting	Require third-party vibration and air overpressure monitoring for each blast at locations at least as close as the nearest occupied off-site residential structures, with reports maintained for regulator review and made available to affected residents upon reasonable request.
Blast design near residences	Require site-specific blast design controls as quarry activity approaches residential areas, including conservative charge weights, delay sequencing, borehole logging, geology review, and adaptive blast management to remain below legal limits and reduce community impacts where practicable.
Noise and dust controls	Require a written dust and noise control plan addressing haul roads, water trucks, exposed areas, drilling, berm construction, complaint response, and periodic review of controls. Confirm that

Stormwater and water quality	no fixed production equipment, crushing plant, processing plant, or customer truck access is permitted in the extension area without additional review.
Berm design and maintenance	Require final stormwater and erosion-control plans prepared by a qualified professional before land disturbance, with specific protection of Hickory Creek, wetlands, drainageways, sinkholes, and downstream properties. Require proof of all TDEC, USACE, Knox County, and other applicable approvals before disturbance.
Reclamation and financial assurance	Require final engineered berm design, slope stability review, construction sequencing, erosion control, vegetation plan, height verification, replacement planting requirements, and long-term maintenance standards. Require the screening berm and vegetation to be substantially complete before extraction begins behind that segment.
Public liaison and complaint process	Clarify the expected 50-plus year operating horizon, permit duration, reclamation obligations, and financial assurance or bonding sufficient for current reclamation costs.
Prior conditions preserved	Require a documented neighbor notification and complaint-response process, including a community liaison, response time expectations, complaint log, corrective-action tracking, and periodic summary reports to Staff and affected residents.
Future changes require review	Carry forward all applicable 2009 conditions unless expressly modified through the current approval, and identify each modification in the Staff Report.
	Require additional review before any change to external access, public truck routing, fixed production equipment, lighting, processing equipment, operating hours, or material placement outside approved areas.

11. Suggested Questions for the Revised Staff Report

1. Would Staff recommend approval of the Use on Review if Graybeal Road remains public and in its current alignment?
2. Does Staff believe the proposed road closure is consistent with the Hardin Valley Mobility Plan, including Safety Project S-2?
3. What is the basis for concluding that a short-term level-of-service analysis is sufficient for a public road closure in a growing area?
4. How will emergency access and route redundancy be maintained if the public connection between Buttermilk Road and Pittman Drive is removed?
5. What conditions prevent quarry operations east of Graybeal before the road issue is resolved?
6. How will Staff verify compliance with Article 4.10 performance standards for noise, vibration, dust, air emissions, lighting, odors, stormwater, and safety?
7. How will Staff verify that buffers, berms, fences, and vegetation remain effective during construction, operations, and the long operating life of the quarry?
8. What specific changes from the 2009 approval are being approved now, and what 2009 conditions remain enforceable?

11A. Residential Compatibility, Community Character, and Human Impacts

The current application should be reviewed in the context of the community that exists today and the community Knox County has recently approved and planned for, not only in the context of the quarry's historic operation. This issue is

related to the road and transportation concerns addressed above, but it is broader than road alignment alone. It goes to the core Use on Review question of whether the proposed expansion is compatible with surrounding development and whether neighboring interests and the public health, safety, and welfare are adequately safeguarded.

The Knox County Comprehensive Land Use and Transportation Plan establishes a countywide vision for growth, infrastructure investment, community character, housing, conservation, recreation, transportation, and quality of life. The Plan's vision is "a thriving county that honors its natural beauty and cultural heritage, while supporting diverse people and businesses." Its stated goals include community character, housing options, conservation, transportation, infrastructure investment, recreation, economic growth, and workforce opportunity.

The area around Buttermilk Road, Graybeal Road, Pittman Drive, Yarnell Road, Hickory Meadows, and the adjoining residential developments is not simply an isolated industrial edge. It is an area where Knox County has approved and continues to consider residential growth. Recent Planning records for nearby Ball Homes development identify the area as Rural Living and Hillside/Ridgetop Protection, with surrounding land uses including single-family residential, rural residential, agricultural uses, and forested land. Planning Staff also found that nearby Planned Residential zoning was consistent with adopted plans and compatible with surrounding development.

The Comprehensive Plan describes Rural Living areas as primarily single-family residential within a rural setting, with agriculture, open space, limited supporting commercial uses, and civic uses. That description is important because residents are not asking Planning Staff to ignore Vulcan's existing operation. Rather, residents are asking Staff to evaluate whether extending quarry operations east of Graybeal Road remains compatible with the residential and rural living pattern that Knox County itself has approved, encouraged, and relied upon in recent planning decisions.

The Comprehensive Plan also recognizes Mining and Heavy Industrial as a place type. However, that place type is described as mostly representing existing conditions and as appropriate in locations outside urban growth areas, generally in existing industrial areas or with interstate or arterial highway access. The fact that mining is recognized as a legitimate land use does not eliminate the need for a compatibility analysis when mining activity is proposed to expand closer to existing homes, newly approved subdivisions, rural residential properties, and public roads.

This is where the human condition must be addressed. Quarry operations are not merely lines on a plan. They involve long-term blasting, vibration, air overpressure, dust, noise, drilling, overburden removal, truck and equipment movement, stormwater controls, berm construction, reclamation, and complaint response. These impacts may be regulated, and they may be mitigated, but they are not imaginary. They affect how families experience their homes, how children and older residents experience their neighborhood, how residents use outdoor areas, how wells and structures are perceived and monitored, and how much trust the community has in the approval process.

Accordingly, the Staff Report should expressly evaluate compatibility under today's residential conditions. The question is not simply whether Vulcan can comply with minimum statewide blasting, stormwater, or mining regulations. The Use on Review question is whether the proposed expansion, with appropriate enforceable conditions, is compatible with the surrounding neighborhood character and whether neighboring interests and the general public health, safety, and welfare are adequately safeguarded.

Requested Staff Clarification

- Identify the current Comprehensive Plan place type for the proposed quarry expansion area and the immediately surrounding residential areas.
- Explain whether the expansion area is designated Rural Living, Rural Conservation, Rural Agriculture, Mining and Heavy Industrial, or another place type on the Future Land Use Map.
- Explain how the proposed quarry expansion is compatible with nearby properties that Planning Staff has recently reviewed as Rural Living, Planned Residential, single-family residential, agricultural, and open space.

- Explain how the Staff Report reconciles recent residential approvals near the site with a proposed long-term expansion of blasting and mineral extraction.
- Identify the specific conditions needed to protect residential structures, wells, outdoor use, community character, noise, dust, vibration, air overpressure, stormwater, and public confidence over the life of the quarry.
- Clarify whether Staff believes compliance with minimum regulatory standards alone is sufficient to satisfy the Use on Review compatibility standard, or whether additional site-specific conditions are warranted due to the proximity of existing and recently approved residential development.

12. Closing Request

I respectfully request that Planning Staff address these issues in the revised Staff Report before the continued hearing. The current application raises important questions of ordinance compliance, adopted-plan consistency, public road policy, emergency access, residential compatibility, community character, human impacts, and enforceable safeguards for neighboring interests and public health and safety.

The community recognizes that aggregate is an important local material and that Dixie Lee Quarry has operated in this area for many years. At the same time, the present application would move quarry operations east of Graybeal Road into a substantially changed residential and transportation-planning context. A complete record, clear ordinance interpretations, and enforceable conditions will help protect the community, the County, and the applicant by reducing uncertainty before decisions are made.

Thank you for your consideration and for the work Planning Staff is doing on this matter.

Source Documents Reviewed

- Knox County Zoning Ordinance, as amended through April 21, 2025, including Articles 1, 4.10, 4.50, 5.22, and 6.50.
- Knoxville-Knox County Planning Use on Review Report, Case 7-B-26-UR, including Staff recommendation and application exhibits.
- Vulcan Lands, Inc. Plan of Operations and related exhibits for Dixie Lee Quarry Extension.
- Cannon & Cannon Transportation Impact Letter regarding proposed Graybeal Road closure.
- Hardin Valley Mobility Plan, including Safety Project S-2 and the plan discussion of growth, connectivity, congestion, school traffic, and future transportation needs.
- 2009 Use on Review record for Case 4-B-09-UR, including the condition requiring separate Use on Review approval before land east of Graybeal Road could be used in any way associated with quarrying.
- Knox County Comprehensive Land Use and Transportation Plan, adopted by Knoxville-Knox County Planning Commission on March 7, 2024 and Knox County Commission on April 22, 2024, including the Future Land Use Map, Rural Living place type, Mining and Heavy Industrial place type, vision, goals, and implementation policies.
- Ball Homes rezoning and concept/development plan records for nearby Buttermilk Road residential development, including Planning Staff findings regarding Rural Living, Hillside/Ridgetop Protection, Planned Residential zoning, surrounding residential and agricultural land uses, street connectivity, and compatibility with adopted plans.