

Harvey Broome Group Sierra Club
Statement to the Knox County Growth Policy Coordinating Committee
January 10, 2024

I am Gerald Thornton, 413 Sugarwood Drive, Farragut, TN 37934. I am Chairperson of the Harvey Broome Group Sierra Club, a citizen organization many of whose members reside in or enjoy Knox County and the City of Knoxville.

We appreciate the many hours of work this committee has put into the proposed Knox County Growth Plan. However, we think the planning process has been handled badly. Planning should begin by evaluating the “carrying capacity” of each area of the county to accommodate population growth without causing environmental harm and plan accordingly. This approach was not taken.

We have identified several flaws in the Plan, and consequently ask that the Committee postpone voting on a recommendation to approve the Plan until the concerns identified by us and other citizen groups and individuals have been addressed.

The Plan would amend the Growth Plan approved in 2000 to provide growth plan for the unincorporated portions of the county. The Plan is intended to guide growth for the next 20 years but is based too much on existing conditions and infrastructure, current trends in land use, population projections, and the natural environment. The needs of the metropolitan area for the next 20 years cannot be adequately addressed by basing the Plan primarily on existing conditions.

The plan also purports to incorporate the recommendations in the Knox County Comprehensive Plan, a document that is only in draft and has not been subjected to public scrutiny or made final. In this regard, we believe the cart is before the horse! You should not adopt a growth plan for our next 20 years based on a draft document that has not been subjected to public scrutiny.

The proposed plan appears to envision urban, suburban, and rural areas designed to accommodate transportation only by individual vehicles. This concept is obsolete and has been shown in numerous instances to have negative effects on the quality of life of the residents and of the local environment. Any growth plan needs to account for the impacts of climate change and greenhouse gas emissions, which are primarily caused by the transportation sector. This Plan does not do that. The Plan should guide growth toward the development of self-sustaining clusters corresponding to the town center concept that provides housing, employment, shopping, and recreation within walking distance of the residents, and not toward continued urban sprawl that only benefits the developers profiting from it.

Thus, we support the position of the farmers and residents of east Knox County to keep existing farmlands classified in the rural areas. Why not designate specific areas exclusively for agriculture and also designate some areas for County Parks and

additional natural areas? The Plan makes no specific designations of parklands or natural areas. This is a major omission.

Here are some additional concerns:

1. The amended plan eliminates existing sector plans entirely, thus ignoring the enormous amount of existing planning based on more local considerations. It removes the essential concept of permitted density, except in the rural area. This change denies property owners the existing protection against harmful adverse impacts on properties and neighborhoods. No justification for removing the Sector Plans has been provided.
2. This Plan would have profound effects. Under TCA 6-58-107(a) all land use decisions must be consistent with the Growth Plan. Therefore, the Amendment to the Growth Plan MUST be put on hold and MUST be considered in conjunction with the draft Comprehensive Plan and map, which have not yet been vetted by citizens or elected officials.
3. The amendment eviscerates all protection for hillsides, slopes, and ridgetops in the unincorporated areas, despite much public support for such protections, which are crucial to protection of water quality in Knox County streams; Ridgetop, hillside, and slope protections should be mandatory.
4. Infill growth should be emphasized in the plan. New and infill developments must be well planned, attractive, and include a variety of housing options, retail and restaurants, schools, parks, and other amenities for the growing population.
5. The amendment makes no mention of enhancing public transportation, assuming business as usual. The growing congestion on city, county, and state roads, and the increasing vehicle miles traveled, needs to be addressed in this growth plan. It is time to start making some provisions for efficient, effective public transportation systems that make the cities and county more pedestrian oriented than vehicle oriented.
6. Allowing residential development in the rural areas at two dwelling units per acre is too dense and does not provide adequate protection for the rural landscape.
7. The Growth Plan does not consider increasing energy efficiency standards for dwellings, commercial buildings, and factories, which would make the Knox County environment more sustainable for everyone. Nor does it designate any areas of the County for solar farms or wind farms, which will be needed as the economy becomes more electrified.
8. There appears to be inconsistent statements of the criteria for rezoning decisions. Section 2 says "Rezoning decisions shall be consistent with the Growth Plan Map and policies." Then, Section 3 says "Rezoning of slopes shall be based on the adopted policies of each legislative body." This will likely lead to inconsistencies in zoning decisions across the county. So does Section 4.2, which limits rezonings to three placetypes and to be consistent with the "adopted comprehensive land use and transportation plan," which is not a final document. Finally, Section 5.3 says that rezonings in the Planned Growth Area shall be

consistent with the adopted land use map and comprehensive plan adopted by the Knoxville-Knox County Planning Commission and legislative bodies," ...none of which has happened. Once again, the cart is before the horse, and the cart is full of inconsistencies!

For all of the above reasons, we urge you to postpone any vote on this plan until it can be revised in light of these and other criticisms. If you must vote tonight, please vote no.

Respectfully submitted,

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