

We are submitting this comment regarding the proposed Unified Development Ordinance and Draft Zoning Map 2, particularly as they affect the areas surrounding **7404 Wickam Road and 8141 Wiebelo Drive**.

We are not opposed to responsible growth or new housing. We are opposed to increasing the development capacity of existing neighborhoods without an enforceable requirement that the infrastructure serving those neighborhoods can safely support that growth.

Residents in these areas are already dealing with significant traffic and difficulty safely entering and exiting our neighborhoods. Roads, intersections, schools and other public infrastructure have not kept pace with the amount of growth Knox County has experienced. Increasing the number of homes that can ultimately be built without first addressing those existing deficiencies will compound the problem.

This is especially concerning because Advance Knox states that zoning may be changed to support the Comprehensive Plan in areas **where infrastructure is in place**. I am asking Knox County to demonstrate what objective measures are being used to determine that adequate infrastructure is actually “in place” before increasing development potential.

These concerns are not new. Knox County Planning Commission records show that residents of Camelot II were raising concerns about traffic, visibility, limited neighborhood access and connecting existing neighborhood streets to additional development as far back as 2005. Similar Planning Commission records concerning development connected to Golden Meadows and Gray Hendrix document concerns about congestion, narrow roads, emergency access and school traffic. At that time, County Engineering itself acknowledged a sight-distance problem at Gray Hendrix/Garrison Road as well as problems involving school buses.

More recently, a transportation analysis prepared for development along West Emory Road described portions of West Emory as a two-lane road narrowing to approximately 18 feet, with very limited shoulders and areas where there is no recovery area beside the pavement. These conditions illustrate why simply determining that an individual development meets a traffic threshold is not sufficient. The cumulative effect of development matters.

The proposed NR-1 standards also allow single-family detached lots as small as 5,000 square feet. Even though not every existing parcel can or will be subdivided, the County should calculate and publicly disclose how much additional residential build-out capacity the proposed zoning map creates across these areas and whether the existing infrastructure can accommodate that additional growth.

Before this UDO is adopted, we are asking Knox County to establish an enforceable infrastructure-concurrency or adequate-public-facilities standard. Increased development intensity should not be approved unless the roads, intersections, schools, stormwater systems and emergency services serving that development have adequate existing capacity, or the necessary improvements are funded, scheduled and completed concurrently with the development.

Infrastructure review should consider **cumulative development**, including projects already approved or pending, rather than evaluating each development in isolation. Traffic studies should include peak-hour conditions while schools are in session, actual queues and delays at neighborhood exits, crash and sight-distance conditions, school capacity, fire and EMS access, drainage and stormwater capacity, and the impact of additional traffic on roads that were not originally designed for current levels of development.

Developers should also be required to contribute an appropriate share of the infrastructure improvements made necessary by their projects. Existing residents should not bear the safety consequences and tax burden of repeatedly approving development first and trying to correct inadequate infrastructure years later.

I also ask that future street connections or stub-road extensions into established neighborhoods not be approved solely for the purpose of providing access to new development without a documented traffic and safety analysis that considers the impact on the existing neighborhood and provides meaningful notice and input to affected residents.

Growth and infrastructure need to occur together. Before increasing residential development capacity in these areas, Knox County should be able to demonstrate publicly that the roads, intersections, schools, stormwater infrastructure and emergency services can safely support the cumulative development that the new zoning will permit. If that capacity does not currently exist, the infrastructure improvements should be funded and scheduled before additional density is approved.

Sincerely,

Kimberly S. & Elena W.