

f. Martha

*Martha:
I had already
made my own complete
copy of this before
you gave it to me.
Just discovered
it -*

Feb 28

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COMMENTS

ON THE

DRAFT ENVIRONMENTAL/SECTION 4 (f)
STATEMENT TO COMPLETE I-40
THROUGH MEMPHIS, TENNESSEE BETWEEN
CLAYBROOK AND BON AIR STREETS

SUBMITTED
BY

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ON BEHALF OF
THE CITIZENS TO PRESERVE
OVERTON PARK, INC.

INTRODUCTION

This Environmental Statement draft has missed a great opportunity. There was a chance to make a comprehensive, objective analysis that could have ended the long controversy over this highway. This Statement could, and should have provided the systematic compansion of alternatives and the solid foundation of facts that are going to be needed - sooner or later - to solve the I-40 problem and to heal the scars that the fifteen years of highway battle have created in this community.

Another, and possibly more important opportunity was also missed by the people of Memphis. Here was a chance to pause in the building of highways and to reflect on what is happening to your city. You had a chance that few cities have had to stop and analyze the trends that are right now creating the Memphis of the 1980's and 90's - the city your children will live in. In a sense, this is an opportunity you share with many cities in the South. There is no need to repeat here the mistakes that have messed up our Northern cities. You can avoid their mistakes. You can, if you want to, build a different way of urban life based on Southern traditions and Southern ideas about land, history and family life. It is those missed opportunities that make the Statement so disappointing.

It is fragmentary there is not nearly enough information to make an objective decision, and, worse, because it is incomplete, this statement only prolongs the controversy.

I believe however that the Environmental Statement can be made more useful to the people of Memphis, and that is the subject of the comments that follow. Fortunately, there is one more chance to take advantage of the opportunities, the final Environmental Statement. I hope that those responsible for the Statement will take these and other comments in the spirit in which they are intended - not as obstructism but an honest effort to find a solution to the complex problems of building a better city.

PART I: The overall impact of the highway on Memphis.

What is the overall impact of a new highway on the environment of a city?

Highway impact, of course, varies from place to place, and it depends on the size and the stage of growth of a city. But we now have enough experience with Interstate Highways and urban freeways so that specific impacts can be assessed. I'm afraid this Environmental Statement ignores most of them.

There are several well known effects that could have been analyzed here. For example, highways tend to disperse cities. As highway systems improve people, industry, stores and offices tend to move to the suburbs. It is no accident that the construction of the Interstate system coincides with a period of massive suburban growth -- or as some people say "the flight from the cities." The nineteen fifties and sixties were decades of highway construction and decades of suburban shopping centers, industrial parks, suburban office parks, etc. They are not, except in isolated cases, decades of downtown prosperity.

Those isolated cases of downtown revivals have some important lessons. Many of the downtown revivals -- Boston, Nashville, Minneapolis for example -- depended on land being cleared and building sites being made available through urban renewal. A new highway does something similar to urban renewal, but in the outlying areas. It opens up new lands for development. It makes remote areas accessible, and it is in those newly accessible areas with vacant land that most new city growth takes place. The rapid development along the Washington Beltway, the enormous concentration of offices at Valley Forge outside Philadelphia, the locating of Walt Disney World near Orlando, Florida -- these are the major kinds of impact Interstate highways are having on cities.

It is important to realize, too, that at each step in the completion of a highway system, the impact is different. One might ask what difference could be made by short, three mile segment of highway located in a built-up section of a city. The answer is: Plenty. Many people have already recognized that Memphis transportation and economics are very different with or without the segment through Overton Park. For example, the Statement repeatedly refers to important, economic benefits that would result from completing this short link. Furthermore, many people in Memphis believe

that this link will have a major impact on downtown -- an area 2 or 3 miles from Overton Park.

What are the economic benefits to which the Statement refers? What will be the impact on downtown? Unfortunately, the Statement could, but does not, analyze those impacts. Even though each link of a highway is a powerful influence on the form and functioning of the city, the Statement simply does not distinguish between different impacts of the various alternatives, and it dismisses the economic development impact of not completing the link with:

"Business activities would slow down due to inconvenience of access from consumers. Some would probably relocate causing further inconvenience to the area residents and employees."

There is no way of being sure whether that conclusion is as wrong as it sounds. It is not supported by any evidence nor any specifics. Nor are any of the more positive conclusions. All we get from the Statement is a general assumption that this segment of highway will have only good economic impacts on Memphis.

There are some significant specifics hidden inside that generalized assumption. Consider example, the impact on downtown. Those people who look on the completion of I-40 as a stimulant to downtown growth should study the experience of other cities. Typically, improved highways tend to move residents and industry out of the cities into the suburbs. Shopping centers and businesses follow them. Downtown declines. In some cities, however, like Memphis, which have historically had a regional economic function, the need for a regional office center will often bring about a downtown "revival" - an office construction boom. But in these cases a city's history and the regional highway system tend to play the major roles in the process, not the inner-city highway links.

In fact, when a major office boom does hit a downtown area, no feasible amount of inner-city highway construction will make it a convenient place to reach and to park. Highways and a dense cluster of high rise offices in old downtown areas simply do not work well together. With our present patterns of land ownership, our building financing, arrangements and zoning laws, the growth of a downtown usually brings with it daily, miles-long traffic jams, and worse parking problems. As a result, of such problem many of the cities that have seen their downtowns grow -- Atlanta, Washington, San Francisco, Honolulu - are spending millions in some cases hundreds of

millions of dollars to find an alternative to urban highways. And consider this: San Francisco, where the city government stopped highway construction completely and turned down Interstate funds has a booming downtown; across the Bay, downtown Oakland, at the focal point of a highway system (and the new rapid transit system), is not.

In the case of San Francisco, many people would argue that stopping all Interstate highway construction has helped to make the city, including the downtown, grow and prosper. Stopping highway construction, along with other related efforts, has demonstrated that San Francisco is a city profoundly concerned with its way of life. It is a city determined to preserve a superior living environment, and those efforts and that environment may well have been a factor in attracting residents and business. It would not be difficult to find out if that argument is correct; and it would not be difficult to analyze its applicability to Memphis.

Downtown development issues -- all economic development issues - are complicated ones. If an environmental impact statement is going to do its job, a highway segment must be analyzed as much more than just a structure for moving cars and trucks. Much of the growth you see happening around you

in Memphis; is profoundly influenced by highway segments; much of it is not. Impact can be assessed in a meaningful way only if it is related to the other city-building forces at work in Memphis today.

I am not trying to describe here the history or the future of Memphis. The point I am trying to make is this: the overall impact of the completion of a highway segment can be analyzed -- we, and other planners do that for our clients as an every day part of our business. Except for some general statements about transportation and economics, however, the impact of this highway segment on Memphis simply is not analyzed in this Statement. It does not even seem to me to conform to the rock-bottom requirements of the Federal Highway Administration policy and procedures. (PPM 90-1, Appendix E.)

PART II: The full impact on the neighborhoods.

What is the impact of a highway on the neighborhoods through which it passes -- or, to use the wording of the Statement, through which it "slashes"?

This Statement illustrates two disturbing assumptions.

The first assumption is a tendency, also evident throughout the trial, to treat the impact of a highway as if it ended at the right-of-way line. There are exceptions, of course: the traffic on streets feeding the highway has been calculated -- but most of its impact is ignored; noise impacts on adjoining land are calculated -- and, incidentally, are shown to exceed Federal standards along almost all of this highway segment; and finally the impact on businesses affected by closing the L & N track is considered -- but, of course, the track does not have to be condemned and closed.

There is much more, however, that happens beyond the right-of-way that could and should have been analyzed. They are all impacts well known and regularly used by professionals in my field and I believe in many others.

For example, it is well known that new highways and their interchanges bring about major changes in land uses. That probably sounds self-evident, but this impact Statement actually says:

"Land uses in the vicinity of this highway section are not expected to change to any significant degree in the foreseeable future."

I could not believe that when I read it. That conclusion could only be true if Memphis had a totally different economic system and totally different way-of-life from the rest of the country. As a matter of fact there have already been at least ten rezoning cases already approved within a few hundred feet of the constructed portion of I-40 in Memphis.

Consider as one example, the new traffic patterns on all of the streets that feed a new interchange. The greatly increased traffic and the new pattern of accessibility will have an impact all along those streets on noise and air pollution, on land values, on rezoning applications and, as a result, on changes in use. On some streets, for example those that have industrial or commercial zoning important interchanges, there will be new gas stations, eating places, and other highway related

development. On other streets, Avalon for example, when the hazards of greatly increased freeway-bound traffic are added, a quiet, secure residential way-of-life will be disrupted and you can expect to find families selling their houses to land speculators and apartment developers. Other streets will be dead-ended, totally changing their function. Furthermore, many commercial uses on arterial streets depend on large volumes of through traffic. If that traffic were diverted to an expressway, they may be put out of business.

There are methods of projecting all of these kinds of land use and environmental changes, and there are methods no more speculative than the traffic projections that underly this whole highway proposal.

Unfortunately, the raw material needed to analyze neighborhood impacts apparently was not gathered. Some neighborhood data is in this report.

The Statement takes eleven pages (almost 10% of the document) to describe the "individual neighborhoods" through which I-40 will pass. However, the Statement hardly refers to this information again; it mentions that the highway is a barrier, a noise generator, and a taker of land. But few questions about the impact on neighborhood life are discussed or even asked. For example, the report from which the neighborhood information is a report with very limited objectives. It is intended to be a basis for studying "blight" and recommending neighborhood "conservation" and "rehabilitation" efforts. But the Statement

does not even consider whether the highway help or hinder those efforts?

What does happen in neighborhoods when noise, odors and the visual presence of the highway are added to other "blighting influences" already present?

If there had been a thoughtful analysis of the neighborhoods, the Statement could have described the actual "descriptions" and the actual "inconveniences" caused by the highway. Are they major or minor? Are a group of old or poor people (who cannot drive) cut off from their services and churches? Who specifically are the businessmen or the churches who must be relocated? Can they relocate easily? Would they welcome the opportunity to relocate because of all of the other changes that are going on around them? Or will relocation put them out of business? Many of the commercial areas in central Memphis are in transition or planned for changes. Is the highway an aid to some desirable, planned renewal? Or is it a disaster? What happens to whom? What we need are specifics; all we get is generalities. There is no analysis of the realities of people's lives.

The second assumption that underlies much of this impact Statement is related to the first.

It is the assumption that most of the impact, and virtually all of the negative impact of this highway segment has already been felt. The full discussion of community disruption on the so called "approved alignment" lists only

those changes caused by purchase and clearing of the right-of-way, primarily taking of property, and minor adjustments to public service and community boundaries.

Further, the full discussion of economic impact of the so-called "approved alignment" mentions only two specifics, the taking of businesses and reducing the taxable property, both the result of purchase and clearing the right-of-way. No other economic import is analyzed, although there are many comments about the general benign effect of completed highways on the "overall economic picture."

It is difficult for me to believe that people charged with continuing, comprehensive, cooperative planning of an urban area can consider that all of the significant community disruption and economic impact have occurred once a highway right-of-way is purchased and cleared. Here are just a few impacts not felt until after a highway is built:

1. The new patterns of accessibility. It is common knowledge that a new highway and its interchanges open up new land for development or redevelopment and blights other land. A new highway changes the geography of a city, just like our old highways did. There is no mystery about that. Some land owners and real estate developers anticipate it, but

most do not. The big changes in land use are still to come, and there will be plenty of them.

2. The new patterns of traffic loading on the streets; Avalon Street, for example, has not felt that impact yet. (One of the comments often heard at highway hearings is that the people whose houses are taken are the lucky ones; their neighbors left behind are the ones who suffer.)
3. No streets are yet closed nor traditional routes blocked. For example, no church or school or shop is cut off from those who have been using it.
4. The disruptive and economic effects of noise and air pollution. Consider for example, those houses whose backyards will be a highway -- or those a few lots away. It is difficult for many people to imagine the meaning of "70 dba" until they are trying to sleep on a hot night with the windows open.

PART III: The L & N Alternatives: What is unique?

The authors of this Statement spend 38 pages describing their analysis of the L & N Alternatives and concern for unusual and unique factors. But are there unique factors? The answer to that question is clearly "no". This is a unique situation only in the sense that every situation, like every person, can be called unique. The conditions encountered in this highway location are common, everyday problems encountered in highway after highway and city after city. The overwhelming conclusion of the Statement is that any highway through any part of this district is disruptive. If there is anything "unique" here, in the usual sense of the word, it is clearly Overton Park.

Consider what the Statement finds "unusual" and "unique" -- pages 113 and 114 -- about the "L & N Alternative". This is where the Statement summarizes and concludes the L & N analysis.

First, the Statement quotes me as saying that the L & N Alternative would pass through unusually nice neighborhoods. That is true. The so-called "approved alignment" through Overton Park does the same. In most major cities, I can think of highways have cut through what I would call unusually nice neighborhoods. Let's face it; any highway between Claybrook and Bon Air Street will go through unusually nice neighborhoods.

Next, the Volluntine-Evergreen neighborhood is cited and referred to as unique. I think we all admire and applaud the accomplishments of the group there, and certainly city planning and highway planning efforts should be influenced by the extremely important work being done there, but to call efforts to integrate a neighborhood "unique" or "pivotal" is to ignore decades of social history in the United States. Furthermore, Memphis has many integrated neighborhoods and blocks, as an examination of the census will show. If the city and highway planners genuinely want to help the Volluntine-Evergreen group, and I think they should, they would not build this highway segment at all. They would use the existing cleared right-of-way to make this part of the city a highly desirable place to live -- and they would preserve this neighborhood's major amenity, the recreation facilities of Overton Park.

Next the Statement says:

"In addition to the 'unusualness' or 'uniqueness' of the neighborhoods through which the L & N route would pass, many of the other features along the alignment which have been previously described are unique."

The following items are listed as "significant". Look at each of them.

What is the impact? What is unique?

- "1. The industrial park, because of its importance to the economic and employment situation in Memphis."

This item refers to a two-paragraph analysis (page 96):

"As either Route A or C continues through the industrial park, Figure D-5, two companies will significantly be affected. The Shelby County Growers Association Market, which is the wholesale produce exchange for produce markets in the Memphis area, will lose two large buildings if Route A is used, and the Buckeye Cotton Oil Company will be impacted, as well as the Growers Association Market, if Route B is used.

As the alignment approaches Scott Avenue, Figure D-6, both routes will follow the same alignment in order to pass between the major buildings of the Ivers and Bond Piano Company and the Buckeye Cotton Oil Company. There is approximately 400 feet separating these buildings which restrict the highway in this area. As mentioned briefly earlier, the highway will be on structure to pass over Cypress Creek, Scott Avenue, four tracks of the L & N Railroad, two tracks of the Union Railroad, loading and storage areas, and finally Jackson Avenue. An interchange with Jackson Avenue should be placed here to serve the needed access to the industrial park. However, any

attempt at providing this structure to service the directional movements needed would result in massive taking of right-of-way and disruption to the industrial park and community as previously discussed."

What that adds up to is this: the highway would do three things:

- a) take two buildings, which are open sheds, from an open air market;
- b) have some unspecified impact on the corner of Cotton Oil plant; and
- c) involve a large but not unusual interchange requiring an unspecified land taking of unspecified impact. In fact, much of that interchange could probably be located on a car wrecking lot and a storage yard.

There is nothing here of unique importance to the economic and employment situation in Memphis. In fact, there is no evidence that the economic welfare or employment in Memphis would be affected in any way.

"2. Cypress Creek, because it is a major drainage facility."

Cypress Creek is not a unique drainage facility. It is a small watershed of the type crossed by almost every major highway in Tennessee.

Furthermore, the Statement does not identify any impact that the

L & N Alternative would have on Cypress Creek. It states that three

long culverts would to be built, but if they are properly designed, which they would be, their impact on the Creek would be the same as anywhere else -- practically negligible.

(If the author of this Statement considers three "long" culverts unique, I wonder what he thinks of the Mississippi River Bridge.)

"3. The L & N Railroad, because of the economic survival of the many companies it serves along the Memphis Main Line depend heavily on the service it provides."

The L & N can be left in service. There are other places in Memphis where a railroad and Interstate highway share parts of the same right-of-way. There is a section on I-40 itself in Memphis where the highway and railroad are located together. In other cities there are innumerable similar examples. There is nothing unique here.

Further, as this Statement points out, since the L & N can remain in service and there need be no impact on companies dependent on its service.

"4. The water well sites along the L & N Railroad right-of-way, because they are major water supply for the city of Memphis, and because they serve as valuable mini-parks for the surrounding communities."

Moving these wells is simply a matter of cost, but neither the cost nor engineering problems are extraordinary. By way of comparison, the Statement refers to the "complex interchange" at Watkins and North Parkway. One reason that it cost \$1,533,000, as noted in the Statement, was because it involved a major change in underground pipes. There was an "unusual" cost there, but a routine engineering problem. The same applies to the wells. There are utility problems on almost every highway.

Regarding the mini-parks, they are grass plots around the wells; they can hardly be considered unique and particularly when compared to Overton Park.

"5. Southwestern University, because it is an important educational institution."

Southwestern may be unique among the universities of Tennessee and the world, but whether it is or not, according to the Statement, the L & N Alternative has no identifiable impact on it, except to make it more accessible to more people in Memphis.

"6. Woodmont Towers, because of the high density of people it houses."

This apartment building is certainly not unique in its size or density. I do not know how many such apartments are in Memphis, but there are thousands not much different all over the country. In any case, according to the Statement, the L & N route does not have any identifiable impact on it.

"7. Sears and the adjacent commercial center, because of its importance to the economy of Memphis, and because of the service it provides to the surrounding communities, the State of Tennessee, and many other southeastern States."

Again, no impact is described in the Statement except that some commercial land will be taken. There are no unique features about this commercial area. In fact the current city plans call for a re-development of this area. This is a routine highway relocation problem.

As for Sears, there is no impact identified nor is any likely.

"8. The North Parkway-Watkins Avenue interchange, because of its structural complexity and the high volume of traffic it handles."

This is not a uniquely complex interchange, nor is its traffic volume unique. There are many interchanges not much different. In any case, the Statement identifies no impact on the interchange; its structure is not affected; its volume of traffic would probably be reduced by the highway.

"9. The reduced service the L & N alignment would provide, because its alignment is north of east-west desires generating from the south, and because it cuts across the north-south, east-west pattern established in Memphis causing increased disruption and interchange problems."

There are two separate issues in this item:

a. . The first is "reduced service", caused by the more northern alignment. The Statement does not describe the difference in service, which, according to Highway Department figures, would be about 1 1/2% or 2 1/2%. That difference is negligible in view of the projection techniques used. The reduction in service could hardly be considered unusual or unique.

This seems to me a specious argument, particularly in view of the present proposal to build a highway on a southern route

that seems to coincide exactly with those "east-west desires generating from the south."

- b. The second issue has to do with following the existing street grid. Since this issue is mentioned many times in the Statement, I would like to look at it closely. It is probably natural for traffic engineers to look at community patterns primarily in terms of streets, but community grain and boundaries are also the result of breaks in topography like the bluffs along river, drainage facilities such as Cypress Creek, railroads, including the L & N, and large land holdings, such as a golf course or a university or park.

In fact, Cypress Creek is a factor in community pattern and grain. It presents a more significant break in patterns than any feature traversed by the so called "approved route" except for Overton Park itself. The diagram at the top of Figure C-7 (page 52), which presents the preferred practice, for locating highways is a fair diagrammatic representation of the Cypress Creek area.

Further, the L & N alignment is also a break -- a seam in the city patterns. About two-thirds of the alignment that is used,

from Hollywood to McLean, is fairly represented by the preferred diagram at the top of Figure C-7.

The fact is that the L & N Alternative follows the grain and pattern of the community, and that fact is amply demonstrated by every measure of disruption used in this study and before it. The L & N Alternative takes fewer houses, fewer businesses, fewer institutions, and no Overton Park land.

After listing the nine significant features discussed above, the Statement asks us to judge them collectively. All right. For five of the nine items (2, 3, 5, 6, and 8), even if they were unusual, which they are not, the Statement describes no impact at all. Three others (1, 4, and 7) and part of the fourth (9b) are routine land taking or utilities problems, in sum total less of an impact, less disruption and cost, than the land taking along the so called "approved route". The final point boils down to a traffic engineering issue of little environmental impact.

In other words, if there were anything unique, unusual or extraordinary about the L & N Alternatives the factors were not found in this study nor described in this Statement.

When I finished reading this part of the report and the conclusions that were drawn I was ashamed of my government.

PART III: The "do-nothing" alternative

Two points come through very clearly and persuasively in the Statement.

The first: the L & N Alternative presents no unique or unusual problem and indeed is less disruptive than the "approved" route. The second persuasive point: this highway segment should not be built at all.

What would happen if this segment of highway were not completed? The Statement refers to this as the "do-nothing" alternative. The environmental impact is analyzed almost solely in terms of increased congestion on the streets.

There is no doubt that without this segment some of the existing streets would have more cars on them. But what is the "environmental impact"? This Statement does not tell us. There are warnings and generalizations, but there is no information that gives any one a basis for comparing this alternative to any other alternative.

For example, the Statement says non-completion "would adversely effect (sic.) the mobility of the metropolitan area." That is probably true, every city has traffic congestion, even small towns, but the environmental impact question is how much inconvenience, how much delay, what kinds of adversity? It is quite possible that people in Memphis might be willing to put up with some

adverse effects in order to preserve their park, if they knew what these effects were, but this Statement offers no measures. One study of Memphis indicated that without this segment of highway, it might take people in two Memphis districts an extra few minutes to drive downtown. In other words, the adverse effects might well be negligible and they might be preferable to damaging the Park.

Furthermore, the consequences of "congestion" are stated only in generalized terms. For example, the Statement says that residential streets will be loaded with "dangerous" traffic. Which ones are they and how will the situation differ if the highway is completed? The proposed highway interchanges will load residential streets, too. Congestion is a fact-of-life on, as well as off, all urban highways including the Interstate highways.

Regarding business activities slowing down, the incredible comment of this Statement (quoted previously) is contrary not only to common sense, but to every day experience. Regarding access to institutions, there is no analysis of which ones would be affected or how. For example, most people go to church on Sundays, not during the congested hours.

The most incredible analysis of impact has to do with the impact on Overton Park. This Statement actually says that if this highway segment is not completed through Overton Park, the use of the Park "would be restricted". The reason

presumably is that fewer people could get there. What about the thousands of people who get there now? What about the noise? What about the use of the Park?

And what about the positive results. If the highway were not built, many negative impacts will not be felt. There would be no land depletion, no vegetation destruction, construction inconveniences, noise, etc., etc.?

If one were to accept the total list of negative impacts listed, and then compare them to the positive impacts -- that is the elimination of all of the pages and pages of problems and disruptions referred to throughout the Statement -- then one is led to the obvious, inescapable conclusion that it is far better not to build this segment of highway at all.

The Statement goes on to make this conclusion even more persuasive. On page 128, the transportation aspects of the completion of I-40 are discussed in very specific terms. (It is too bad that environmental impacts are not discussed in equally specific terms.) It describes the basic purpose of I-40 in this way:

"The I-240 circumferential route is a part of the entire system and has been designed to meet the future growth in the adjacent areas while I-40 was designed to solve the more urgent needs of the already developed urban area....Figure D-19, which was previously shown

as Figure A-13 depicts the areas which I-40 is primarily intended to serve."

Figures D-19 and A-13 have a note that the east-west route (I-40) "Serves large residential areas north and south of Interstate route and commercial properties on Summer. Connects with major north-south streets." A city map outlines the area served. It is a strip of land from 2 to 3 miles wide extending from the mid-town interchange to a point just east of Perkins Road, and roughly centered on I-40.

What is the character of the area to be served by this segment of I-40. As the Statement says, it is an "already developed urban area." It has had a stable population for over a decade; in fact, it lost population between 1960 and 1970. If that is the case, why build the new highway segment at all? If there is no growth in this corridor, little more traffic will be generated. "Congestion" will not be much worse than it is today. There would hardly be any noticeable negative impacts.

One might argue that this area is already redeveloping with major new construction that will generate more traffic. The Statement finds "the area just north of Overton Park to have major apartment complex growth and significant population increase. The area northeast of Overton Park is an area of significant land use development for residences." No such development is taking place. If it were taking place, it would be in violation of the law, since

there is only one 3 acre site zoned for apartments in that area. In fact, the 1970 Annual Report of The Memphis Urban Area Transportation Study finds that the area referred to here had the lowest population growth of any area in Memphis. (See their tabulation of construction of residential units after 1965.) Looking at the entire corridor there is no evidence that there is enough growth or growth potential in the corridor to justify adding a 6 lane freeway to the existing streets, unless there is also a massive rezoning and redevelopment, and a major investment in related public facilities.

One might still argue that all of those "east-west desires" still remain -- that you can not argue with the figures. Is that true? The east-west travel desires are projections, not facts, but projections, and they are necessarily subject to some error. As it turns out, however, they are based on at least one assumption that has turned out to be wrong. The assumption is written in this Statement as follows:

"Extensive residential development around Memphis and to the east has increased the east-west desires and the need for an east-west expressway. The area to the east of Memphis offers the best potential for future urbanization. Such barriers as the Mississippi River to the west, the Mississippi State line to the south, and the Wolf River with its low lying marshy areas to the north make these directions less

desirable than the easterly direction for land development. The most recent report from Memphis Urban Area Transportation Study for fiscal year 1970 includes the Location of Significant Land Use Study area, Figures A-15 and A-16."

However, if one studies the 1970 report and glances at A-15 and A-16, it is evident that eastward is not the direction of major growth. Of course, areas to the east are developing, but consider what MUATS has found. Of the eight residential areas designated, "areas of Major Population Growth", three are to the north, four are to the south, only one is to the east, and it is south of Walnut Grove. Likewise, of seven apartment growth areas, two are shown along I-40 and one of those, north of Overton Park seems to be in error. The other five are all to the south of Southern Avenue.

The same applies to recent areas of so-called "Significant Land Use Development" in the report. Three residential areas are shown in the corridor served by I-40. (There are no major residential developments going on in two of the areas shown.) Of the remaining seventeen significant areas, one is downtown, two are north, two are east (both south of Walnut Grove), and twelve are south. Other recent studies confirm that the bulk of growth is to north and south, and especially to the south.

In other words, traffic projections that have been used to justify I-40 are possibly wrong -- or at least misleading.

That should surprise no one; first, because the projections are fifteen to twenty years old, and second, and more important, because land use and development tend to follow the availability of transportation. If new highways were built to the north, development would tend to go that way. If they were built to the south, which they were, development would tend to go that way, which it has. Land use and development do not take into account the "total transportation plan" that is drawn in reports, they respond to the partial systems that are built on the ground. The city's growth adjusts itself to the transportation system.

Thus it is misleading to say, as the Statement does:

"Regardless of whether I-40 is completed or not, the east-west traffic desires as previously shown on Figure A-10 will exist."

If this segment of I-40 is not built, then transportation and therefore the pattern of accessibility in Memphis will be different. A different land use pattern will result. The east-west desires will change. The city will adapt itself -- just as it has over and over again in the past.

In summary then, based on what is in this Statement, and what can be seen in Memphis, this seems to be the situation:

1. The purpose of this I-40 segment is to serve an "already developed urban area" that cannot grow much more without massive rezoning, and except in one limited area, is not growing now.
2. Contrary to what happened in the past, the principal new commercial and residential development (if MUATS is to be believed) is to the south of Memphis, and to a lesser extent to the north, not downtown and to the east. It is misleading to assume that the east-west desires projected years ago still exist.
3. There appears to be no urgent need for this last segment of I-40. If it were not built, it seems unlikely, based on this Statement, that the I-40 corridor will become much more congested than it is today. A redesign of Highland Interchange and some street changes could help solve the problems one sees today.

4. Even if it does become more congested, there are no specific negative impacts identified in the Statement, only a few generalities, and nothing "extraordinary."
5. If this segment of I-40 is not built, none of the negative impacts detailed elsewhere in the Statement need occur -- and Overton Park need not be disturbed.

It would make a lot of sense to take a serious look at this idea rather than dismiss it. It might be the best way out for Memphis. You might also save a whole lot of money.

As an outsider, I would like to conclude with this observation. This is an important year in the history of Memphis. Decisions will be made that will affect this city long after our present highway officials have retired and all of us are gone. It seems to me very sad and frustrating that this Environmental Statement does not help anyone make a rational decision. You deserved better.

NOTE: Re use of words

As a professional who works with engineers, including traffic engineers, and occasionally supervises their work, I object to the way the phrases "sound engineering" and "not feasible" are used in this Statement. "Sound engineering" is used here to mean something like "the best possible highway engineering", including concepts of lowest cost from a highway builder's point of view, standard handbook practice, etc.

In the normal professional usage, "sound engineering" means reliable, sensible, thorough and complete engineering. In normal practice there are several "sound engineering" solutions to most problems, and, of course, there are several solutions to this relatively simple, straightforward highway engineering problem.

As for "feasible", in normal professional use this term means "possible, something that can be done in a reasonable, practicable way". This Environmental Statement not only ignores normal usage, but also ignores the Supreme Court definition of feasible in such conclusions as:

"For the reasons discussed above, I-40 is contrary to "sound engineering" and therefore not "feasible."

I believe that every conclusion in this Statement that uses those terms in these ways is misleading and itself contrary to sound engineering practice.

I would reject any report submitted to me with such misuses of our professional language.

NOTE: Regarding "urban planning"

The discussion of the urban planning process in the Statement may explain in part why I find the analysis of impact so incomplete.

The definition of urban planning on Page 28 ignores the last ten years of development in the field, particularly with regard to the setting of goals and objectives, citizen participation in planning, and so-called middle-range development plans, to name a few common elements of most big city planning processes.

Furthermore, city plans prepared using the process described in the Statement become as often as not hopelessly out of date in a few years, especially in a fast-growing city. Compare, for example, the "generalized land use" map on which the general location of I-40 was based, Figure A-12, with Figures A-15 and 16, which show actual land use trends in Memphis. There are some similarities and some very important differences.

Reading this Statement and analyzing its city planning background, one is drawn to the conclusion that this transportation planning process is not a part of an up-to-date city planning process, that there is not overall city planning foundation for this work, and therefore all of its conclusions are, in my mind, subject to question.

CONCLUSION:

Before a responsible decision can be made about this highway segment, more information is needed than is now available in the Draft Environmental Statement. The following kinds of questions can and should be answered. (A more complete discussion of each of these points is in the accompanying text.)

1. The overall impact of the highway.

What are the specific broad, overall impacts on Memphis?

How does the completion or non-completion of the highway segment affect other plans and objectives of the city, for example, with regard to downtown, the rate and direction of residential growth, neighborhood development or conservation, the adequacy of public facilities, such as parks, and the distribution of employment in the metropolitan area?

The years of Interstate highway construction in this country have also been years of suburban growth and central city decline. Will Memphis follow that pattern? There is now enough experience on which to draw to answer all of these questions.

2. The neighborhood impact.

What are the impacts of the highway beyond its right-of-way?

What additional impacts will be felt after the highway is built and operating?

It is well known that land use and transportation are intimately interrelated. A change in one inevitably affects the other.

What will those changes be if this highway segment is built or not built?

For example, what will be the impact of the increased traffic bound for the highway interchanges Avalon or on East Parkway or other streets? What will be the impact of the highway nuisances -- noise, fumes, visual intrusion -- on the neighborhoods through which it passes?

What are the specific impacts on these neighborhoods?

3. The L & N Alternatives.

What unique problems are raised by the L & N Alternative?

What are the problems of extraordinary magnitude? The draft statement does not even describe the impact on, much less

the uniqueness of, the most "significant" features, and there is no comparison with the "approved" alignment. The conclusion of this section of the Draft is totally unsupported by evidence.

4. The "do-nothing" alternative.

The impacts are, for all practical purposes, simply not analyzed in the Draft. What evidence is there to indicate the degree and duration of congestion? What would be its specific impacts of congestion on these specific neighborhoods? What about the "negative" impacts that are avoided if the highway segment is not built?

The Draft raises serious questions about the justification for this segment of I-40. How do the projections of land use and population, on which the highway plan is based, compare to actual growth and development of Memphis? What evidence is there to indicate that the "already developed" urban corridor, which I-40 is designed to serve, will grow enough to justify adding a six lane highway?

5. The use of words.

Since the Draft uses "sound engineering" and "feasible" in an unusual way, they should either define those terms or use different words.

The meaningful "impact" of this highway segment, that is, its impact on the realities of peoples' lives, can be determined only if questions such as those above are answered. Those questions cannot be answered if the "studies" of the highway are only a repetition of earlier, limited-purpose studies.

This highway controversy will come no nearer to a solution until there is, as a minimum, a thorough up-to-date analysis of:

- (1) The actual impact of not building this highway segment, but building I-240 and making other selected improvements.
- (2) The specifics of the neighborhoods affected by this highway and the specific impacts that would result with or without this highway.
- (3) The current growth patterns and plans of Memphis and their interrelationships with highways.

Those are basic analyses that have not been done. Yet without them, there are not enough facts to make a meaningful judgment on this highway.