

# SOUTHERN ENVIRONMENTAL LAW CENTER

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*VIA E-MAIL AND U.S. MAIL*

Mr. Michael Dennis  
PE SCDOT Program Manager  
P.O. Box 191, Room 513  
Columbia, S.C. 29202-0191

Re: I-85 Corridor Study Comments

Dear Mr. Dennis,

The Southern Environmental Law Center submits these comments on behalf of Upstate Forever in response to the public notice regarding the Analysis of the I-85 Corridor between US-25 (White Horse Road) in Greenville County & SC-129 (Fort Prince Boulevard) in Spartanburg County as prepared by Civil Engineering Consulting Services, Inc. (CECS). We commend the agencies for completing this study and look forward to working with various stakeholders to address the transportation and mobility challenges and opportunities in the rapidly-growing Upstate region.

Upstate Forever has attempted to closely follow the proposed widening of the I-85 Corridor since originally learning of its possibility through an article in the Greenville News on September 30, 2008. Website information has been difficult to access, but Upstate Forever has met with SCDOT and CECS representatives on two occasions – November, 2010 and April 2011– to receive briefings on the status of the I-85 Corridor Study. Upstate Forever representatives have also attended the two public meetings conducted in July, 2010 and April, 2011. We are concerned, however, that there were only two public meetings conducted and that the Draft Study was not available to the public even for the second meeting of April 28, 2011. In fact, the Draft Study is not available as of this date, even though comments are due May 17, 2011. For this reason, we reserve the right to supplement our comments once the Study has been finalized and made available to the public. Please forward me a copy or notify me when the study is complete and posted on the website.

We applaud the consideration in the project scope of a range of approaches beyond only highway lane-mile capacity additions to address existing and future congestion along the I-85 Corridor. In particular, demand management, improved connectivity on the existing street network, transit and freight rail strategies can be used, in combination, to avoid expensive, destructive widening projects that encourage greater driving over the long term. We are concerned, however, that the study scope and timing has not been integrated with the study of options for the I-385 Corridor prior to the inception of the current widening project, and the study of alternative configurations for the I-85/385 intersection. These three related projects should be considered together, as they are clearly related to each other. Our other specific comments and recommendations follow:

**Eight Lane Highway Corridor.** We believe it is premature to recommend that the entire I-85 Corridor be widened even in the long range planning horizon of 2035. Such an approach should be considered a last resort after other less expensive approaches, which do not compromise air and water quality through their direct and sprawl-inducing effects, are deployed. Similarly, construction of a massive collector/distributor system to expand the highway system will have many of the same detrimental effects of an eight lane highway footprint.

Such an approach is of particular concern due to the ongoing air quality issues in the Upstate. While the area has managed to avoid formal designation by participating in the “Early Action Compact” program, similar programs are unlikely in the future. Moreover, the proposed new ground level ozone standard will be difficult to meet in the Greenville/Spartanburg area, even without the addition of significant highway capacity. The Spartanburg ozone monitor has shown average ozone levels at 0.083 parts per million, which is over the current EPA standard of 0.08 parts per million. The area is only in compliance by virtue of the fact that the EPA currently rounds figures down. Although the EPA new standards are not yet issued, the proposed updated standard in March of 2008 was 0.075. This standard is under consideration for further strengthening to 0.70 or lower based on the recommendation of the EPA scientific advisory panel.

**Road Network Connectivity.** The study map identifies a few major road corridors parallel to I-85 that might carry some of the traffic that would otherwise use I-85. This concept should be expanded upon with a goal to make a more robust, grid-like network of streets along the corridor, as well as throughout the metro area. Diverting less local traffic onto the Interstate network, which constitutes a majority of the vehicles on the highway, rather than through travelers, would lessen congestion both on and off the Interstates. One parallel corridor that deserves particular focus is the U.S. 29 Corridor connecting Greenville, Greer and Spartanburg. The corridor is already seven lanes wide in most locations, has significant potential for transit oriented development (TOD) and would be an ideal place for enhanced bus transit in the short term and a light rail or trolley upgrade over the 2035 planning horizon.

Again, one key concern regarding the existing road network is the pending plan to expand the I-85/385 interchange. This project should be integrated into the larger corridor study, rather than proceeding on a piecemeal basis prior to developing and committing to a mobility strategy for the entire I-85 Corridor.


**Metro Transit.** While current densities and development patterns are auto-centric, the Upstate region is well-positioned to increase transit as a way to address congestion and help shape future growth in the region. The linear nature of the population distribution along the I-85 Corridor is particularly well suited to transit, including, potentially, bus rapid transit using HOV lanes, light rail, trolleys and other alternatives to single occupant driving. According to a Brookings study released last week ranking Greenville in the bottom quarter, similar sized communities in the US have much more robust transit capacity and plans than the prognosis reflected in the CECS Corridor study. See website [www.brookings.edu/metro/jobs\\_and\\_transit.aspx](http://www.brookings.edu/metro/jobs_and_transit.aspx).

**Passenger Rail.** The I-85 Corridor through the Upstate is strategically positioned along the Southeast High Speed Rail corridor, midway between Charlotte and Atlanta. As in other metro regions along the corridor, there is tremendous potential to promote greater passenger rail connectivity to these larger metro areas. Increased passenger rail service might even be integrated with local transit in Greenville, Spartanburg and Anderson, as is being considered in the Triangle area of North Carolina.

**Freight Rail.** The I-85 Corridor already serves as an important distribution link for rail freight, taking trucks off the highway. Not only do trucks add significantly to local congestion but they also disproportionately add to wear and tear on the highway system and increase particulate pollution. This concern will be greatly magnified if the I-85 Corridor were to become an eight lane highway, posing a toxic air emissions danger to nearby residents, schools and other public facilities.

We appreciate the opportunity to submit these comments and look forward to working with the South Carolina Department of Transportation and other state and local agencies to address mobility and growth issues in the Upstate in a proactive fashion.

Sincerely,



J. David Farrén  
Senior Attorney

Cc: Ron Patton, SCDOT  
John P. Edwards, SC DOT Commission  
Wesley B. Anderson, Greenville MPO TCC Chair  
Jim D'Amato, Spartanburg MPO Technical Committee Chair