

December 5, 2025

*Via Email*

**Secretary Daniel Johnson**

North Carolina Department of Transportation  
i-77south@ncdot.gov

Re: I-77 South Express Lanes – Public Comment

**Dear Secretary Johnson:**

We submit these comments on behalf of the 24 undersigned organizations, which collectively represent thousands of residents who live in and around the project corridor and would be directly harmed if this project proceeds, as well as thousands more across Charlotte, Mecklenburg County, and the region.

Speaking with one voice, all signatories oppose this project, and we respectfully ask that you stand with our communities. Our reasons for opposition, along with our requests of you, are outlined below.

**What NCDOT Is Proposing**

NCDOT has proposed widening approximately 11 miles of I-77 South from the South Carolina line to I-277/NC 16 by adding two new tolled express lanes in each direction, rebuilding interchanges, and, in some segments, potentially stacking an elevated roadway above the existing interstate. NCDOT intends to utilize a public-private partnership, similar to the one used for the I-77 North project. A private company would operate the lanes and set dynamic prices to keep them flowing, which is exactly what has led to very high, unaffordable tolls for low to moderate-income residents on I-77 North.<sup>1</sup>

**Why This Repeats and Deepens Past Harms**

The highway cut a swath through nearly every one of Charlotte's historically Black communities along its length — starting in the Historic West End with Biddleville, Oaklawn Park, McCrorey Heights, Dalebrook, and parts of Wesley Heights and Seversville, then continuing south to Wilmore and into the West Boulevard and South Tryon corridors that served Black Charlotteans pushed out of other parts of the city.

77 South brushes or bisects Black and historically Black communities along the West Boulevard and South Tryon corridors — Reid Park / Arbor Glen, Revolution Park, Clanton Park / Irwin Creek, and the West Boulevard villages. These areas sit immediately west of I-77 or depend on greenways, parks, and streets that would be affected by widening or an elevated option.<sup>2</sup>

**Equity and Access**

This project would create premium, high-priced lanes for those who can afford them, while everyone else remains in the general-purpose lanes, which NCDOT's own analysis shows will continue to be congested over time. **That is the definition of a two-tier system.** We have already seen on I-77 North that dynamic pricing can push tolls to levels that are out of reach for many working families. Building more lanes that only some people can use is not transportation equity.<sup>3</sup>

### **Environmental and Community Impacts**

NCDOT's October 2024 project materials show 13 interchanges, four grade separations — including a greenway — and multiple retaining walls within this 11-mile stretch. Each of those is a potential impact point to parks, cemeteries, industrial-legacy sites, and housing. It will also take part of Frazier Park in Third Ward and would make a planned extension of the Irwin Creek Greenway through McCrorey Heights effectively impossible, permanently barring neighborhood access to the beautiful, peaceful Irwin Creek corridor that residents have already been cut off from for decades by the existing I-77.<sup>4</sup>

**The construction of I-77 through Charlotte's Black neighborhoods stands as one of the most harmful examples of environmental injustice in the city's and state's history** — and rather than working to repair that injustice, this project would deepen it even further.<sup>5</sup>

Tailpipe emissions from vehicles are the single largest source of dangerous air pollution in Mecklenburg County.<sup>6</sup> Residents in the Historic West End have already documented elevated exposures using community monitors and EPA EJScreen, precisely because of the concentration of highways, freight, and industrial uses around them.<sup>7</sup> EPA EJScreen and the 2024 Charlotte MSA Priority Climate Action Plan flag census tracts along this corridor as disadvantaged because they face both higher pollution and higher vulnerability.<sup>8</sup>

Adding more lanes and moving traffic faster through this tight corridor will increase traffic-related pollutants (NO<sub>2</sub>, PM<sub>2.5</sub>, diesel exhaust) next to homes, parks, schools, and churches. Charlotte's Strategic Energy Action Plan (SEAP<sup>+</sup>) commits the city to cutting community-wide greenhouse-gas emissions 72 percent by 2035 and reaching net-zero by 2050.<sup>9</sup>

Expanding this freeway pushes us further from those goals by locking in more driving and more emissions in the very place we are trying to reconnect.

### **Physical and Cultural Destruction**

Beyond the emissions: Widening this freeway with four more lanes means pushing more ugly, intrusive concrete farther into already-burdened neighborhoods — destroying existing houses, tree canopies, and commercial buildings, and once again lowering property values and quality of life, just as the existing freeway did.

**Perhaps the most disrespectful impact of all is on Pinewood Cemetery.** Pinewood was established in 1853 as the burial ground for Black Charlotteans, located directly beside but separated from Elmwood Cemetery by a fence, where white residents were buried. When the interstate was first built, it was routed through Pinewood, not Elmwood, splitting the Black cemetery into multiple pieces and requiring the removal or relocation of graves of early Black residents.

The current proposal would add insult to injury by pushing even more concrete highway infrastructure deeper into this sacred site, rather than repairing the harm that has already been done.<sup>10</sup>

### **It Won't Fix Congestion**

Highway widening has been studied for decades, and the results are consistent everywhere: it does not reduce congestion for long. When new lanes are added, they may appear to relieve traffic at first, but within a few years, they fill right back up — often to worse levels than before.

This occurs due to a well-documented phenomenon known as “induced demand.” In simple terms, when you make driving easier or faster, people drive more. More people take trips they previously avoided, move farther from work or school because travel feels faster, or choose to drive instead of taking the bus, carpooling, or biking. Over time, all those extra miles driven erase the temporary congestion relief the new lanes created.<sup>11</sup>

Extensive research confirms this pattern. A University of California, Davis study analyzing 30 years of highway data found that a 10 percent increase in lane miles leads to roughly a 10 percent increase in vehicle miles traveled within just a few years, effectively erasing any congestion benefits.<sup>12</sup>

The Texas A&M Transportation Institute found that metro regions investing most heavily in highway expansion did not experience better congestion outcomes than those that invested less.<sup>13</sup> The Congressional Research Service and Federal Highway Administration likewise conclude that adding lanes on congested urban freeways “often results in only short-term improvements before congestion returns.”<sup>14</sup>

**Locally, NCDOT's ongoing project to widen I-485 from I-77 to U.S. 74 in South Charlotte provides a cautionary example.** The project began in 2019 and is adding one tolled express lane in each direction, as well as a third general-purpose lane in each direction between Rea Road and Providence Road. The new general-purpose lanes opened in late 2021, and the tolled express lanes are still under construction, with an expected opening in winter 2025, following multiple delays.

Since the additional lanes opened, traffic volumes in that corridor have already increased, reinforcing what decades of research have shown nationwide: **when driving becomes easier or faster, more people drive until congestion returns.**<sup>15</sup>

So while NCDOT's I-77 South project may promise smoother travel in the first years after completion, the long-term result will almost certainly be more cars, more congestion, and higher costs — not lasting relief. Those who can afford the tolled express lanes will continue to move freely, while everyone else will be stuck in even heavier traffic on the “free” lanes.

Charlotte deserves better than another billion-dollar experiment that's already failed here and in cities across the country.

### **A Better Path**

The only effective way to move more people in this corridor is to invest in reliable, frequent transit — dedicated bus lanes on I-77, buses that come at least every 15 minutes on primary roads parallel to I-77, safe and accessible bus stops, and coordinated land use to shorten trips.

NCDOT's current plan offers no public transit alternative, requiring local residents to fund improvements to transit and active transportation themselves — with no financial support from the state.

### **Our Request**

For all of these reasons — historic and racial injustice, environmental and public-health burdens, financial risk, and the creation of “lanes for the affluent” — we are asking Charlotte City Council, the Mecklenburg Board of County Commissioners, and the members of the CRTPO board to:

**1. Unequivocally oppose this project** and any plan to widen I-77 South. There is no adjustment, mitigation, or design alternative that can justify further cutting through these communities. Rather than deepening the wounds of the past, Charlotte, Mecklenburg County, and NCDOT must lead in healing them.

**2. Champion a new vision for restoration and reconnection.** Around the nation, cities are taking bold steps to repair the injustices caused by mid-century highway construction.

Projects like ReConnect Rondo in St. Paul, which is building a land bridge over I-94 to restore a Black community erased by freeway construction; the Albina Vision Trust in Portland, which is capping I-5 to reclaim land for housing and cultural space in the historic Albina neighborhood; and the Cap and Stitch initiative over I-35 in Austin and the Central 70 project in Denver, which are creating green decks and community plazas over freeways, all point to what justice-driven leadership looks like today.<sup>16</sup>

We urge you to work with us to initiate similar reconnection and restorative projects here in Charlotte, not further division. The City of Charlotte has already recognized through its own “Reconnecting the West End” initiative that highway construction, specifically I-77, demolished minority neighborhoods such as Brooklyn Village and displaced families into the West End, only for those neighborhoods to be destroyed again by I-77 and I-277 interchanges.<sup>17</sup>

It is time for the city, the county, the state, and the federal government — whose past decisions inflicted this generational harm — to lead the way in re-establishing the connections that were torn apart by I-77.

**That is what justice requires.** It is the opposite of what this proposed project would do.

We look forward to your response.

Respectfully,

Charlotte City Council Member Joi Mayo

Board Chair

**Transforming Nations Ford**

Sean Langley

President

**McCrorey Heights Neighborhood Association**

Al Austin

President

**Historic Third Ward Neighborhood Association**

Rickey Hall

President

**West Boulevard Neighborhood Coalition**

Jerod Brown

President

**Biddleville-Smallwood Community Organization**

LaDonte Lee

President

**Concerned Citizens of Washington Heights**

Shannon Hughes

President

**Five Points Collaborative and Wesley Heights Neighborhood Association**

Ismaail Qaiyim

Core Member

**Charlotte Housing Justice Coalition**

Rev. Greg Jarrell

Senior Campaign Organizer

**The Redress Movement**

Jennifer Wilson  
President  
**Seversville Neighborhood Organization**

Virginia Keogh  
President  
**Southwest Area Neighborhood Coalition**

Javier Lopez  
President  
**Steele Creek Residents Association**

Tiffany Fant  
Executive Director  
**Sol Nation**

Mary Foxx Johnson  
President  
**Dalebrook Neighborhood Association**

Trilby Meeks  
President  
**Lincoln Heights Neighborhood Association**

Ron Ross  
President  
**The Northwood Estates Neighborhood Association**

Eleanor Ervin  
President  
**Oaklawn Park Neighborhood Association**

Shamaiye Haynes  
President  
**Greater Enderly Park Neighborhood Association**

Rev. Jennifer Helms Jarrell  
Co-Director  
**QC Family Tree**

June Blotnick and Former Charlotte Mayor Jennifer Roberts  
Co-Founders  
**Charlotte Mecklenburg Climate Leaders**

Jeff Robinson  
Executive Director  
**Clean Aire NC**

Megan Kimball  
Senior Attorney  
**Southern Environmental Law Center (SELC)**

Clayton Sealey  
Owner/Chief Creative Officer  
**CLT Development LLC**

Shannon Binns  
Founder + Executive Director  
**Sustain Charlotte**

**Cc:** Tony Lathrop, Board of Transportation, Chair  
Stephen Rosenburgh, Board of Transportation  
Chris Peoples, NCDOT  
Patrick Norman, NCDOT  
Brett Kanipe, NCDOT  
Felix Obregon, NCDOT  
Julie White, NCDOT  
Ebony Pittman, NCDOT  
Tonya Smith, NCDOT  
Robert Cook, CRTPO  
Neil Burke, CRTPO  
Lisa Qualls, CRTPO Board, Chair  
Brad Richardson, CRTPO Board, Vice Chair  
Charlotte City Council  
Mecklenburg County Commission

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