



National Trust *for*
Historic Preservation

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SENT VIA E-MAIL

October 8, 2019

Bryan L. Jones, PE
South Carolina Department of Transportation
Rural Road Safety Program
Project Manager
955 Park Street, Room 525
Columbia, SC 29201

Re: Comments on Proposed Changes to Historic Ashley River Road (South Carolina Highway 61) in Dorchester County, South Carolina

Dear Mr. Jones:

I am writing on behalf of the National Trust for Historic Preservation (the “National Trust”) regarding the South Carolina Department of Transportation’s (“SCDOT”) proposed changes to a portion of the historic Ashley River Road (also known as South Carolina Highway 61) from South Carolina Highway 165 to the Charleston County line under the Rural Roads Safety Program (the “Project”). National Trust staff members, John Hildreth (Senior Advisor for Special Projects) and Anne Nelson (Associate General Counsel), attended the Public Information Meeting on September 24, 2019 in Summerville, SC. While we support SCDOT’s efforts to improve safety on the Ashley River Road, we strongly oppose the proposed plans for the Project as they will irreparably damage the historic and cultural landscape of the Ashley River Road and the broader historic district. The plans for this Project should be tailored to preserve this iconic and nationally significant historic corridor.

The National Trust is a federally chartered, 501(c)(3) nonprofit organization established by Congress in 1949 to “facilitate public participation in the preservation of sites, buildings, objects, and antiquities of national significance or interest...” with a mission to protect significant places representing our diverse cultural experience by taking direct action and inspiring broad public support. (*See* 54 U.S.C. §§ 312102-31216.) Currently, the National Trust has more than one million members and supporters, including many in South Carolina. Since 1974, the National Trust has owned Drayton Hall, a National Historic Landmark, which is open to the public as a National Trust Historic Site and has been operated by the Drayton Hall Preservation Trust since 2015. The National Trust, in addition, owns several parcels of land within the Ashley River Historic District, which were acquired for conservation and preservation purposes.

The Ashley River Road is thought to be the oldest road in South Carolina still in use today and is characterized by the moss-draped live oak tree canopy covering the road. The unique, historic, and scenic qualities of the Ashley River Road are acknowledged through its designation as a National Scenic Byway, individual listing in the National Register of Historic Places (the “National Register”), and identification as a contributing resource to the 23,800-acre Ashley River National Register Historic District (the “Historic District”). For over four decades, the National Trust has worked, in collaboration with local partners, to protect and defend the historic character of the Ashley River Road and the Historic District.¹ In June 2018, the National Trust designated the Historic District as a “National Treasure.”²

The Project proposes to resurface and widen the Ashley River Road in a way that will likely forever change its historic and natural character with adverse impacts to existing historic resources and the removal of numerous trees. We support the comments recently submitted by the South Carolina Coastal Conservation League (“SCCCL”), and we provide the following additional comments on the Project for your consideration:

1. A Context Sensitive Design Approach for the Entire Ashley River Road Corridor that Preserves More of the Historical and Cultural Character Should be Developed by SCDOT.

The National Trust appreciates SCDOT developing two alternatives for the section of the Project located around Middleton Place, a National Historic Landmark. However, given the cultural, historical, and natural significance of both the road and the larger Historic District, we support SCCCL’s request for SCDOT to develop a context sensitive design approach for the entire corridor that preserves more of the historical and cultural character of the Historic District.

We also agree with SCCCL that the potential impacts to the historic character and trees around Middleton Place in Section #2, Alternative #2 remain too high. The adverse impacts to trees cannot be fully understood since only trees with a diameter of eighteen inches or greater were considered in SCDOT’s analysis of the impacts. Trees of various sizes, even though not eighteen inches in diameter, contribute to the iconic tree canopy and the larger cultural landscape of the Ashley River Road and Historic District. We

¹ Most recently, in March 2018, the National Trust filed a lawsuit jointly with the City of Charleston to challenge the purported annexation of an approximately 2,200-acre tract in the Historic District by North Charleston that could lead to zoning changes, likely ushering in intensive development that could irreparably damage the historic landscape and forever alter the integrity of the Historic District.

² National Treasures are a portfolio of nationally significant historic places where the National Trust is taking direct action.

similarly encourage SCDOT to provide a more thorough analysis of the trees (not limited to eighteen inches or more in diameter) that fall within one or two feet of the edge of the proposed twelve-foot clear zone that should be avoided.

2. The National Trust Supports the Proposal Put Forth by the Middleton Place Foundation, and Other Local Partners, to Make Sensitive Improvements to the Ashley River Road.

The National Trust supports the position of the Middleton Place Foundation, SCCCL, Drayton Hall Preservation Trust and other local partners to improve the safety of the Ashley River Road thorough a series of sensitive improvements to preserve the historic character of the area. These improvements are consistent with those recently completed on the Charleston County section of the road, and include: (1) repaving the lanes immediately; (2) adding a 2-foot paved shoulder; (3) increasing rumble strips and reflectors; (4) decreasing the speed limit to 45 MPH and encouraging increased enforcement; and (5) creating a management plan for the scenic road that includes on-going maintenance. We also encourage SCDOT to explore other sensitive traffic-calming remedies, such as the use of guardrails or cable barriers.

Similarly, we agree that, given the significance of this area to South Carolina and the nation, this Project should be developed in consultation with other state agencies (including Department of Public Safety; Department of Parks, Recreation, and Tourism; and the Department of Archives and History) so that a comprehensive approach can be developed to improve the safety of the Ashley River Road while preserving the important cultural and historic resources.

3. Additional Information is Needed on the Project's Potential Impacts to Wetlands.

Additional information and clarification from SCDOT are needed on the Project's potential impacts to wetlands. The Project will cross an unnamed tributary to the Ashley River and appears to traverse other areas that may be wetlands based upon data in the National Wetlands Inventory³ and the Web Soil Survey⁴. At the Public Information Meeting, our staff received mixed responses from SCDOT about possible wetlands impacts. For example, SCDOT staff stated that: (1) wetlands might be impacted in Section 1, (2) there are possible wetlands impacts to both sections of the Project, but SCDOT has not identified them yet, and (3) wetlands are not expected to be impacted.

³ See <http://www.fws.gov/wetlands/>.

⁴ See <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.

It would be helpful for SCDOT to clarify whether the Project will, or has the potential to, impact wetlands, and whether SCDOT has consulted with the U.S. Army Corps on the need for a permit. Should a U.S. Army Corps permit be required, or federal funds used for the Project, SCDOT must comply with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), and consider the effects of the undertaking on historic properties, including the National Register-listed resources—the Ashley River Road and the Historic District—and the National Historic Landmarks—Drayton Hall and Middleton Place. We also request that SCDOT make any existing studies or documentation on the Project's potential impact on wetlands available to the public.

We appreciate the opportunity to provide comments on the proposed changes to the historic Ashley River Road and encourage SCDOT to review the plans to protect the unique historic character of the Ashley River Road and the Ashley River Historic District. Should you have any questions, please contact Anne Nelson, Associate General Counsel, at 214.734.8952 or anelson@savingplaces.org.

Sincerely,



Paul W. Edmondson
President & CEO

cc: Nate Berry, Open Space Institute
Laura Cantral, South Carolina Coastal Conservation League
Ashley Demosthenes, Lowcountry Land Trust
Winslow Hastie, Historic Charleston Foundation, Magnolia Plantation
John Hildreth, National Trust for Historic Preservation
Carter Hudgins, Drayton Hall Preservation Trust
Kristopher King, Preservation Society of Charleston
Katherine Malone-France, National Trust for Historic Preservation
Anne Nelson, National Trust for Historic Preservation
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Dr. Eric Emerson, South Carolina Department of Archives and History
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