

# ENVIRONMENTAL JUSTICE AGENCY GOALS

North Carolina  
Department of Transportation  
2024

# INTRODUCTION

Environmental Justice (EJ) is an increasingly important subject at North Carolina Department of Transportation (NCDOT). Low-wealth communities and communities of color have historically endured disproportionate harm related to transportation construction impacts and exclusion from transportation investments and policies. Modern federal laws and regulations have helped to prevent further harm and improve inclusivity and equity for all North Carolinians, yet there is still much work to be done. NCDOT is deeply committed to advancing EJ in all areas of transportation planning and decision making.

Executive Order (EO) 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (59 FR 7629; 1994) directs each Federal agency to develop a strategy for identifying and addressing disproportionately high and adverse human health or environmental effects on low-income populations and minority populations, including our lead agency, USDOT.

NCDOT adheres the USDOT EJ principles, which are as follows:

- To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

NCDOT incorporates these EJ principles when administering the requirements of NEPA, Title VI of the Civil Rights Act and related statutes, and other statutes, regulations, and EOs that address or affect transportation infrastructure planning and decision-making; social, economic, or environmental matters; public health; or public involvement.

In October of 2023, North Carolina's Governor Roy Cooper issued EO 292: Advancing Environmental Justice in North Carolina. This EO established the NC Governor's EJ Advisory council, and required each cabinet agency to develop a minimum of three EJ goals with measurable outcomes. In this document, we present the five goals developed by NCDOT.

These goals were developed in alignment with USDOT's Equity Action Plan, NC Executive Orders 305, 292, and 80, NCDOT's Strategic Plan, NCDOT's Climate Strategy Report and Resilience Strategy, NCDOT's Complete Streets Policy, and the NC Vision Zero Initiative.

Work on these goals is already underway. We have established an EJ workgroup comprised of representation from various business units across the Department, bringing diverse expertise to the table to thoughtfully accomplish the task at hand. This workgroup is seeking to develop reliable metrics and indicators for environmental justice and equity across departmental programs and will continue identifying policies and opportunities for advancement of EJ throughout the Agency. Annual updates on these goals will be provided beginning in October 2024.

NCDOT looks forward to building upon this opportunity to further a whole-of-government approach to advancing environmental justice throughout the State. Alongside other State cabinet agencies, we strive to shape a better NC for all.

1. STRIVE FOR EXCELLENCE IN PUBLIC INVOLVEMENT
2. Improve safety and health outcomes for vulnerable road users improve safety and health outcomes for vulnerable road users.
3. Eliminate disparities in access to opportunities and services.
4. Mitigate canopy deserts and address heat islands in Environmental Justice communities
5. Invest in historically underserved communities

Strive for Excellence in Public Involvement

Status: in development

Expected Completion Date: October 2025/TBD

**Background:**

One of the core tenets of Environmental Justice, and a fundamental principle guiding NCDOT actions, is the full and fair participation by all potentially affected communities in Agency decision-making. Low-income populations and minority populations were historically underrepresented in the transportation decision-making process, leading to those populations also being historically underserved and even harmed by transportation outcomes.

As a modern agency, NCDOT takes a proactive approach to engaging historically underrepresented voices throughout project lifecycles. We seek to equip the public with resources for meaningful participation in the transportation decision making process, such as the [Residents Guide to Transportation](#) and our online [Engagement Hub](#). At the beginning of projects, a project-specific public involvement plan is outlined to identify Environmental Justice populations, propose tailored outreach and education strategies to reach and inform impacted individuals with key messages. The goal of this effort is to maximize opportunities for meaningful dialogue and involvement early and often. By reviewing the feedback and concerns of impacted individuals and communities from beginning to end of projects, NCDOT can identify and address adverse effects of projects and deliver context-sensitive, community-informed solutions.

When the public comment period for a particular outreach effort (project, plan, study, or initiative) concludes, a detailed summary is prepared. This summary includes the number of participants, the nature of the feedback received, and responses to submitted comments. It serves as a crucial document for internal review. All feedback is thoroughly reviewed and considered in an post-outreach meeting, with representatives from various units involved in the project's development attending to ensure that diverse perspectives are considered.

While public input is an important component of our decision-making process, NCDOT must balance it against other critical factors such as safety, costs, operations, and impacts on the natural and human environments. This approach ensures that final decisions reflect both technical considerations and community input.

The effectiveness of public involvement efforts are often described qualitatively but can be difficult to quantify. For example, data such as number of participants or number of outreach events does not necessarily reflect quality of efforts, because size, complexity, and location of projects may impact these metrics. This goal seeks to establish clear quantitative performance metrics that will help provide transparency and accountability and track the effectiveness of

outreach efforts. In addition, this goal seeks to improve guidance for public engagement earlier in the planning process, at the project scoping phase. This will help identify concerns with EJ communities earlier, giving planners a head start on finding the best mitigation options.

**Connection to NCDOT Strategic Plan:**

- Goal 4 of NCDOT’s Strategic Plan is to provide excellent customer service.
- Goal 6 of NCDOT’s Strategic Plan is to be a transparent and accountable organization.

**Objectives:**

- Develop and implement a framework for measuring effectiveness of public engagement. Numeric goals will be established once this framework is in place. NCDOT is committed to making public participation process improvements if metrics do not reflect quality and increased equity.
- Improve the pre-NEPA process to promote earlier identification of EJ stakeholders, earlier opportunities for public participation, and better EJ outcomes.

**Outcomes:**

- Quantitative scoring of public involvement efforts.
- Improved Agency transparency and accountability for EJ public outreach efforts.
- Earlier engagement allowing greater opportunity for historically excluded populations to influence transportation decision-making. This may be difficult to quantify but may be reflected in the scoring of public involvement efforts, the extent to which public feedback informs project implementation, and mitigation measures.

Goal: Improve Safety and Health Outcomes for Vulnerable Road Users

Status: Ongoing

Expected Completion Date: Annual progress, complete by 2050

**Background:**

Everywhere we go, we are surrounded by transportation infrastructure – transportation features make up the environment in which we live, work, worship, learn, play, and grow. Everyone deserves equal access to a safe environment. However, minority and low-income individuals are more likely to be vulnerable to transportation-related safety risks and inequities. NCDOT is a partner in NC’s Vision Zero, which seeks to eliminate traffic deaths and serious

injuries altogether. In addition to this commitment, the Department recognizes the need to focus particularly on efforts directed toward those who are facing disproportionate risk.

Many of the most disadvantaged communities in the state (as scored by NCDOT's Transportation Disadvantage Index) are also communities with persistent safety concerns; a disproportionate number of motor vehicle incidents involving pedestrians and other non-motorized road users occur in areas that have been historically underserved and excluded from transportation decision making. These areas can lack sidewalk connectivity, curb extensions, bike lanes and separated bike facilities, crosswalks, sufficient lighting, and other important safety infrastructure measures. Minority and low-income populations are more likely to depend on non-motorized modes as a connector to resources, but less likely to live in highly walkable, bikeable, and rollable neighborhoods, which results in disproportionate exposure to safety risks.

Another important intersection of public safety and transportation is human trafficking. While human trafficking can happen anywhere, a 2018 survey of human trafficking survivors revealed that 42% of surveyed victims in the United States were trafficked using local or long-distance buses. Train stations, bus stops, and other facilities are key locations used to recruit, meet, or transport victims. Since minority and low-income individuals are more likely to depend on alternative modes, this is another area of disproportionate safety risk.

In addition to the prevention of accidental death, injury, and other harm, access to streets and trails that are safe for walking, biking, and rolling promotes an active environment and improved health outcomes, which should be equally accessible to all.

### **Connection to NCDOT Strategic Plan:**

Goal 1 of NCDOT's Strategic Plan is to Make Transportation Safer.

Objectives:

- Improve safety for vulnerable road users by investing in safety infrastructure, messaging, and improved community access to safe and affordable transportation modes in historically underserved project areas.
- Promote safe designs, safe speeds, and implement systemic safety improvements for vulnerable road user safety in accordance with the NCDOT's current Strategic Highway Safety Plan and the Vulnerable Road User Safety Assessment.

Outcomes:

- Reduced frequency of pedestrian fatalities and injuries, with a goal of zero by 2050.
- Reduced crash involvement for LEP, minority, and low-income individuals.
- Long-term: Improved public health outcomes.

**Objectives:**

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- Reduced frequency of pedestrian fatalities and injuries, with a goal of zero by 2050.
- Reduced crash involvement for LEP, minority, and low-income individuals.
- Long-term: Improved public health outcomes.

Goal: Eliminate Disparities in Access to Opportunities and Services

Status: in development

Expected Completion Date: short-term: 2025; long-term: re-evaluate on 10-year basis

**Background:**

EJ populations are more likely than the general population to rely on public transportation to access essential livelihood services such as work, food, daycare, medical care, education, and other facilities. Much of transportation infrastructure has historically centered on cars, meaning lack of vehicle availability translates to inequitable time cost to access basic needs, as well as disparities in access to opportunities altogether. These inequities have been observed to be especially prevalent in rural areas and low-wealth areas. Increasing the reliability and connectivity of public transportation and reducing gaps in service is critical to advancing environmental justice in North Carolina.

**Connection to NCDOT Strategic Plan:**

Goal 2 of NCDOT's Strategic Plan is to improve the reliability and connectivity of the transportation system.



**Objectives:**

- Develop strategies to eliminate disparities by increasing access to alternative modes in communities with limited vehicle availability, so that all residents have equitable access to opportunities and services.
  - Strategies may include working with local governments and EJ communities to increase competitiveness of multimodal projects for discretionary grant funding.
- Bring awareness to existing access disparities between driving and non-driving modes by developing and distributing descriptive data and resources.

**Outcomes:**

- Equip local transportation agencies and advocacy groups with data quantifying access disparities for use in planning and grant applications.
- Provide technical assistance to locals on applications for annual multimodal grants.
- Long-term: Reduction in travel time disparities between driving and non-driving modes.

Goal: Mitigate Canopy Deserts and Address Heat Islands in EJ Communities

Status: in development

Expected Completion Date: 2028

**Background:**

Climate change and resilience efforts are frequently linked to Environmental Justice issues, because the environmental impacts of climate change are often disproportionately borne by historically and presently excluded communities. NCDOT has developed a [Resilience Strategy](#) to address the ability of the state's transportation infrastructure to withstand increased extreme weather events and other disruptions. The strategy emphasizes Equitable Access as a key pillar of the Department's efforts; a report on progress is updated annually. This is accompanied by an annual Climate Strategy report which details extensive work the agency is doing in resilience, adaptation, clean energy and decarbonization, climate impact assessment, and more. The Climate Strategy includes a commitment to continuously evaluating opportunities for application of Justice40 funding and requires descriptions of how environmental justice is being considered in each related agency action. This goal seeks to expand on those existing efforts by addressing an additional topic at the nexus of Environmental Justice, climate change, and resilience that has not yet been included in NCDOT's policies and plans.

Land use patterns across North Carolina have resulted in deforestation and segmented canopy cover throughout the state. Linear infrastructure such as roads and railways are among the leading drivers of development, linking transportation projects to loss of canopy over time. There are many environmental impacts to deforestation, such as soil erosion, water and air quality impacts, loss of carbon sinks, loss of habitat connectivity, and the phenomenon of heat islands due to lack of shade. Like many other environmental and climate issues, the impacts of deforestation can be disproportionately borne by low-income and minority populations. Urban heat islands occur in areas with an abundance of paved surfaces and little vegetation, resulting in temperatures up to twenty degrees Fahrenheit hotter than surrounding shadier, less paved areas. Heat islands can result in serious health consequences, as well as increased energy costs, in impacted areas. As we continue to address the impacts of climate change, including higher temperatures at higher frequencies, the impacts of heat islands must be considered. This goal seeks to develop strategies for mitigating canopy deserts throughout the state, with an aim to identify and mitigate heat islands where they impact environmental justice communities whenever possible.

**Connection to NCDOT Strategic Plan:**

Goal 6 of NCDOT's Strategic Plan is to be a transparent and accountable organization, which includes maintaining our environmental responsibility.

**Objectives:**

- Research, develop, and implement a reforestation plan lead by NCDOT's Roadside Environmental Unit. The plan will also aim to address mitigation of heat islands, particularly in low-wealth areas and communities of color.
- Review and revise existing policies and processes to promote the consideration of shade-providing street trees early in the planning process.
- Continue to incorporate equity and environmental justice as essential components of all resilience and climate strategy efforts.

**Outcomes:**

- Mitigation of heat islands
- Incorporation of environmental justice and equity considerations into climate and resilience actions
- Institutionalization of environmentally sustainable development practices

Goal: Invest in Historically Underserved Communities

Status: ongoing

Expected Completion Date: n/a

**Background:**

Environmental Justice is not only concerned with equitable distribution of burdens of projects, but also benefits. Transportation improvements bring economic growth to project areas by delivering costly construction activities, improving highway and road capacity, aesthetic improvements, and more. Economic development is a major benefit of projects, and it is critical that low-income and minority communities and community members have equitable access to this benefit. NCDOT programs can provide training, certification, upgrade job skills, grow entrepreneurs, and increase incomes. Adding an Environmental Justice focus to our workforce development programs and developing new strategies for reinvestment can aid in expanding access and opportunity for economic growth to all communities while focusing on underserved, overburdened and disadvantaged communities.

**Connection to NCDOT Strategic Plan:**

Goal 7 of NCDOT's Strategic Plan is to be a diverse and inclusive organization, which includes diversity spending.

**Objectives:**

- Use Environmental Justice Mapping tool to target On-the-Job Training Academies, DBE Outreach, and other Office of Civil Rights programming more effectively toward minority and low-income communities.
- Advance workforce development programming with a focus on green technology and infrastructure and emerging technologies to prepare a skilled diverse workforce for the evolving future of transportation.
- Provide technical assistance to Metropolitan Planning Organizations and Rural Planning Organizations as needed to promote best EJ practices throughout the state of North Carolina.
- Continue investigating and implementing strategies to invest in historically underserved communities in alignment with USDOT's Equity Action Plan, NCDOT's ongoing commitment to the Justice40 Initiative, the recommendations of the USDOT Advisory Committee for Transportation Equity, as well as other State and Federal initiatives.
  - o One strategy that has been identified is the incorporation of equity action plans into specified projects. Plans would consider cumulative impacts of past and present agency decisions and propose economic mitigation and benefit strategies. A framework to assess need on a project-by-project basis is being developed.

Outcomes:

- Exceed agency wide diversity spending target (10-12%)
- Incorporate equity action plans into specified projects
- Deliver economic growth opportunities to EJ communities.