



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

ROY COOPER
GOVERNOR

J. ERIC BOYETTE
SECRETARY

MEMO TO: Clean Transportation Plan Draft Committee

FROM: Maya Hoon
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DATE: April 6, 2023
Open Houses: March 1st, 2nd, 6th

SUBJECT: Clean Transportation Plan Draft Feedback

Public Engagement Summary

The N.C. Clean Transportation Plan (NCCTP) public commentary feedback period was an open period to collect public feedback between March 1st and 15th, 2023. There were six open houses held from 5 p.m. – 7 p.m. across the state at the beginning of March. The location and attendance at each open house site were as follows:

March 1st Elizabeth City – 4 Leland – 15	March 2nd Pembroke – 1 High Point – 4	March 6th Vilas – 7 Hendersonville – 19
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The open houses were held to communicate with community members the details of the NCCTP Draft purpose and recommendations and receive written or virtually submitted feedback on the draft. The Transportation Planning Division reviewed the comments and strategized how to incorporate the feedback into the plan where possible. The public comment period ended on March 15th with a total of 298 comments received. The responses provided in this summary are applicable at the time this memorandum was drafted.

Open houses were set up so that attendees could walk in and view poster boards with NC Clean Transportation plan background and recommendations. NCDOT staff and Kimley-Horn consultant staff members were on site to answer questions from the public and elaborate further on poster boards where needed. Poster boards covered the process of why and how the N.C. Clean Transportation plan was developed, the focus areas of the plan (Governance,

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Infrastructure, Funding/Finance, and Communication & Engagement), the 11 key recommendations proposed in the plan with state actions and suggested actions, and the NEVI grant formula program. A looped slideshow was playing in the background of each meeting to provide attendees more information on Executive Orders 80, 246, and 271, the core themes of the plan, and the work groups. Attendees were reminded of the ability to submit comments via the NCDOT Clean Transportation website and the NC Clean Transportation email until the close of the comment period on March 15th, 2023.

PROJECT SUMMARY

- The N.C. Department of Transportation strategized and developed the NCCTP following the creation of Executive Order 246 on January 7, 2022.
- The NCCTP is a guidance document that provides a coordinated strategy for accelerating decarbonization in the transportation sector and supports Governor Roy Cooper’s decarbonization goals as outlined in Executive Orders 80 and 246. The NCCTP outlines how North Carolina can prepare for a clean transportation future and provide equitable outcomes.
- After over a year of workgroup and stakeholder discussions, 11 key recommendations were developed with proposed state actions and supporting strategies categorized by near-term (0-2 years), mid-term (2-5 years), and long-term (5+ years) actions.

STATISTICAL OVERVIEW OF COMMENTS

Comments Received

- 300 comments

Comment Types

- Written Feedback – 6
- Virtual Feedback – 186
- Emails – 108

Comment Subjects

- | | |
|--|---------------------------------|
| • Bicycle/Pedestrian: 132 | • Electric Vehicle Operation: 9 |
| • Communication/Engagement: 14 | • Equity: 33 |
| • Electricity Concerns: 29 | • Funding: 145 |
| • Electrify Ferry Fleet: 92 | • General: 52 |
| • Electric Vehicle Environmental: 12 | • Governance: 13 |
| • Electric Vehicle Infrastructure: 109 | • Land Use: 28 |

- Rail: 6
- Transit: 123
- Vehicle Miles Traveled (VMT) Reduction: 115

Special Interest Groups

Comments were received from the following organizations:

- American Petroleum Institute
- Bike Durham
- BikeWalkNC
- Cape Fear River Watch
- Carolina Advocates for Climate, Health, and Equity
- CleanAIRE NC
- Copper Development Association
- Down East Coal Ash Environmental and Social Justice Coalition/Goldsboro Resilience Hub
- Electric School Bus Initiative
- EVHybridNoire
- Generation 180
- MountainTrue
- Natural Resources Defense Council
- NC Environmental Justice Network
- North Carolina Black Alliance
- North Carolina Conservation Network
- North Carolina NAACP
- North Carolina Justice Center
- North Carolina Sierra Club
- RedTailed Hawk Collective
- Southern Environmental Law Center
- Southern Alliance for Clean Energy
- WakeUp Wake County
- West End Revitalization Association

General Project Opinions

- 210 expressed support for clean transportation
- 41 expressed opposition to clean transportation
- 21 expressed neutral opinions on clean transportation, in which most suggested revisions to the document and specific VMT-reducing examples and recommendations be included in the plan.

GENERAL RESPONSE TO COMMENTS

Bike/Pedestrian

Comment Summary

There were 131 comments received relating to bicycle and pedestrian elements of the NCCTP. A majority of the comments expressed a need for more bike and pedestrian infrastructure and also suggested a larger emphasis on enhancing bike and pedestrian safety elements. The types of comments received were as follows:

1. Build more multi-use pathways, greenways, and connecting sidewalks
2. Increase the number of bike and pedestrian projects by:
 - a. Modifying the State Transportation Improvement Program's prioritization equation to support transit and non-motorized modes of travel
 - b. Rescinding the law limiting funding to independent bike and pedestrian projects as standalone projects

3. Include electric bikes in the plan's bike and pedestrian funding-prioritization related efforts
4. Local NCDOT departments (NCDOT Divisions 1-14) should cooperate with municipal departments to improve bike and pedestrian infrastructure
5. Improve bike and pedestrian safety by reducing speed limits and improving the quality of crash data and exposure data for different contexts
6. The plan is too focused on electric vehicles and not enough on other modes of travel

Responses

1. *As part of the State Actions outlined in the NCCTP's Infrastructure Key Recommendation #2, the NCDOT will support and promote programs for non-vehicular alternative modes of travel and expanding infrastructure to support these different modes. This already includes expanding multi-use pathways, greenways, and sidewalks to enhance community connectivity.*
2. *The NCCTP's Governance Key Recommendation #4 will guide the NCDOT in evaluating the STI normalization process and strategizing how to provide a higher percentage of funding for non-highway projects which promote clean transportation strategies and meet transportation needs. These types of non-highway projects include non-motorized modes of travel. In the same key recommendation, "Removing barriers to funding standalone multimodal projects" includes barriers to independent bike and pedestrian projects. These barriers and ways to modify the STI normalization process will be researched as part of the Supporting Strategies.*
3. *The NCCTP will ensure electric bikes are outlined in the report. When describing bicycle travel, "(including e-bikes)" will be added after the word "bike" at least once in the report. From then on, the term "bike" will suggest the inclusion of e-bikes throughout the report.*
4. *The NCCTP will be edited to incorporate more cooperative activities between NCDOT and municipal departments such as MPOs and RPOs to improve bike and pedestrian infrastructure.*

A new Supporting Strategy will be added to the Communication and Engagement Key Recommendation stating that relevant state agencies and stakeholders will coordinate with the MPOs and RPOs on local outreach to community members. Additionally, the CTP will include a new supporting strategy in coordination with MPOs and RPOs, outlined below in Response #5, covering an effort to improve crash and exposure data.

5. *Connecting people, products and places safely is a major focus on NCDOT's mission, and this mission is incorporated in all aspects of planning and implementation. As such, while safety is an overarching concern, the NCCTP will not develop recommendations specific to safety as the focus of the plan is on emission reductions.*

However, the NCCTP will be edited to include a new supporting strategy under Infrastructure Key Recommendation #2. This new supporting strategy will recommend NCDOT coordination with MPOs, RPOs, and other relevant stakeholders to improve

quality of crash data and exposure data for rural and urban contexts. The crash data may include crash frequency, severity of the crash, injury patterns, contributing factors, and crash types. The exposure data may include volume of crashes, severity, and occurrence.

6. Several key recommendations do outline activities to improve non-EV modes of travel such as public transit, biking, and walking. These key recommendations are included in the following respective sections:
 - a. Governance - #5
 - b. Funding and Finance - #2
 - c. Infrastructure - #2

However, the NCCTP will be edited to further highlight non-EV modes of travel by creating a new "Alternative Modes of Travel" page to discuss VMT-reducing clean transportation modes, including rail, bus, ferry, carpooling, biking, and walking.

Communication and Engagement

Comment Summary

There were 12 responses received relating to communication and engagement aspects of the NCCTP including targeted education and outreach efforts and specific partnerships. These comments identified specific types of stakeholders and outreach methods and tools that should be considered in the NCCTP's coordinated communication strategy. The types of comments received were as follows:

1. List specific partners that can provide direct communication and partnerships with communities and stakeholders
2. Ensure industries also receive technical resources and assistance in the clean transportation transition
3. NCDOT should engage in the legislative process and advocate for legislative action to remove barriers to funding multimodal travel modes. The NCDOT should also commit to working with stakeholders to educate and advocate for legislation
4. Increase communication, engagement, and technical resources for school districts in traditionally underserved communities to electrify bus fleets
5. Partner with schools and post office fleets to initiate pilot programs using different alternate fuel options (not electric)
6. Ensure there is grant writing support especially for rural areas
7. Ensure community leaders help facilitate outreach

Responses

1. The NCCTP team has reached out to some non-profit advocacy partners to carry out the necessary community-based education and outreach activities outlined in the plan and will provide a small list of currently identified partners in the Supporting Strategies of the

Communication and Engagement Key Recommendation. More partners will continue to be identified after the final draft of the plan is written.

2. *The CTP intends to provide technical resources, technical assistance, and education and outreach activities for both public, private, and nonprofit entities.*
3. *NCDOT Clean Transportation Team has limited ability to directly engage in the legislative process as the NCDOT is prohibited from lobbying, but the NCCTP work plans will include suggested areas where work groups and relevant external stakeholders can participate in the legislative process.*

An additional State Action will be added to the Communication and Engagement Key Recommendation where materials will be created and made available to aid stakeholders in their engagement of elected officials and the legislative process.

4. *When strategizing and conducting the coordinated communication strategy outlined in the CTP, the NCDOT and Interagency Task Force will include school districts in traditionally underserved communities in its tailored communication, engagement, and resource assistance efforts. NCDOT and Interagency Task Force will evaluate and consider using identification tools suggested by the World Resources Institute Electric School Bus Initiative.*
5. *NCDOT, the Interagency Task Force, and any other relevant stakeholders will partner with schools and will consider partnerships with post offices in its coordinated communication strategy. NCDOT and other relevant stakeholders will consider looking into benefits and use cases for other alternative fuels.*
6. *The CTP intends to provide technical resources, technical assistance, and education and outreach activities for both public, private, and nonprofit entities. There will be a targeted focus on entities in rural and traditionally underserved locations and disadvantaged business enterprises.*
7. *As part of the coordinated communication strategy outlined in the State Actions of the Communication and Engagement Key Recommendation, the NCDOT and Interagency Task Force will expand and update current communication methods to support education about clean transportation within traditionally underserved communities. This includes ensuring community leaders and diverse speakers are involved in events, communication and outreach efforts. These community members will be integral to the success of the coordinated communication strategy.*

Electricity Concerns

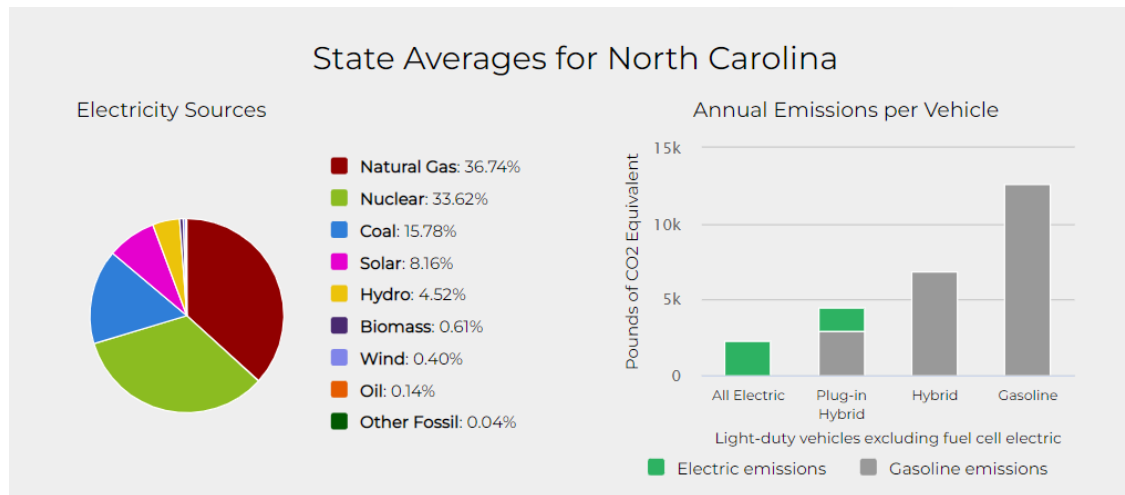
Comment Summary

There were 29 responses received relating to electricity concerns, specifically regarding:

1. The electric grid's capability to handle the adoption of the targeted number of EVs and EV sales percentage
2. The fuels being used to generate the electricity vehicles being unclean or non-carbon-reducing

Responses

1. There is ongoing work by the utilities and energy sector to strategize managing increased demand requirements and enhancing storage infrastructure to support electrification. As part of Governance Key Recommendation #6, the Interagency Task Force will work with utilities to support this ongoing effort to improve the infrastructure.
2. The kinds of fuels used to generate electricity varies by state. North Carolina has been pushing towards using cleaner, less carbon-intensive fuels and has shifted from using coal – the largest greenhouse gas (GHG)-emitting fuel – to renewable energy, a carbon-free source, and natural gas combustion, a process which emits 40% less carbon. The current make up of electricity sources in North Carolina can be viewed from [the Alternative Fuels Data Center](#) figure below:



This figure and a new section describing North Carolina’s progress towards cleaner electricity sources will be added to the CTP.

Electrify Ferry Fleet

Comment Summary

There were 92 responses received relating to the electrification of North Carolina’s ferry fleets. The majority of responses received were from members of the North Carolina Sierra Club. All comments relating to electrification of the ferry fleet recommended the NCCTP document ensure the ferry fleets in North Carolina are electrified to better connect rural communities using clean transportation and enhance coastal tourism.

Responses

*A call-out box will be added to the new section in the CTP addressing alternative modes of transportation (See **Bike/Ped** Response #6). This call-out box will discuss NCDOT’s ongoing efforts to electrify North Carolina’s ferry fleets through the “Vessel Electrification Investigation for the NCDOT Ferry Division Fleet.” The results from this study will support the integration of infrastructure improvements and vessel modification into long-range budget and operation plans.*

Electric Vehicle Environmental

Comment Summary

There were 12 responses received relating to environmental concerns surrounding electric vehicles and the batteries used to operate them. Specifically repeated concerns covered the following:

1. Reliance on internationally sourced materials, such as cobalt, to produce EV batteries
2. The potential for increased environmental pollution from battery disposal once a battery has reached the end of its lifespan.

Responses

1. *The U.S. has some of the world's largest lithium reserves and has begun to focus on domestic mining processes to meet the growing demand for EV batteries which will decrease dependency on foreign imports.*
2. *Different funding programs through the Infrastructure Investments & Jobs Act (IIJA) will provide support and insight into how to recycle critical materials efficiently and extend battery life. Specifically, the IIJA invested \$6 billion to create a battery material processing grant program and a battery manufacturing and recycling grant program. Additionally, the IIJA will be investing \$335 million in lithium-ion battery recycling programs over the next five years. Understanding how to recycle these materials and EV batteries may lead to reduced EV battery waste and potentials for pollution caused by old battery disposal.*

Electric Vehicle Infrastructure

Comment Summary

There were 109 responses received relating to EV charging infrastructure concerns. The majority of the comments expressed concern about the availability of EV charging stations. The types of comments received were as follows:

1. There are not enough EV charging stations available for the different types of vehicles (light-, medium-, and heavy-duty), especially in rural areas and multi-unit dwellings.
2. EV charging stations should be placed in state parks and historical sites
3. Free apprenticeship and workforce training programs for infrastructure maintenance and development should be available

Responses

1. *One of North Carolina's ongoing efforts to expand the state's EV charging network is the [National Electric Vehicle Infrastructure](#) program. In phase 1 of the program, the state will be receiving up to \$109 million to build level 3 fast charging stations within every 50 miles of each other along the state's alternative fuel corridors. In phase 2, discretionary grant funding opportunities will be provided to build out level 2 charging stations to fill*

out the gaps in the charging network. During this phase, communities may apply for funding to build out these charging stations; NCDOT intends to prioritize the needs of traditionally underserved and rural communities to ensure an equitable statewide charging network.

The different medium- and heavy-duty charging infrastructure needs will be assessed through the Advanced Clean Trucks Rule being developed by the NC Department of Environmental Quality as part of Executive Order 271.

A strategy item to consider the charging infrastructure needs of residents in multi-unit dwellings and for consumers lacking off-street parking is addressed in the Infrastructure Key Recommendation #1's Supporting Strategies.

- 2. As the Clean Transportation Team builds out the EV charging infrastructure, they will consider prioritizing EV charging in state and historical sites.*
- 3. The NCCTP's Communication and Engagement Key Recommendation's Supporting Strategies will be edited to address affordability of EV infrastructure training and apprenticeships.*

Electric Vehicle Operation

Comment Summary

There were 9 responses received relating to concerns regarding EV batteries' cost and operational functions (e.g., limited range, long charging times, and reduced quality in performance in cold weather).

Responses

*As efforts to strategize how to recycle EV battery materials increase through IJJA investments (See **Electric Vehicle Environmental** response), the cost of EV batteries may be driven down. Governance Key Recommendation #4 also includes a Supporting Strategy where the NCDOT Clean Transportation Team and the NCCTP Work Groups will continue researching rebates and incentives to improve affordability of clean transportation vehicles.*

*The range, battery lifespan, and cold weather performance of an EV battery can be managed to an extent through recommended EV-user maintenance which will vary based on the manufacturer. EV charging stations throughout the state are expected to increase through programs such as the NEVI program (See **Electric Vehicle Infrastructure** response), minimizing range anxiety. With increased availability to charging options in areas such as workplaces an EV-owner has the option of charging while at work. Additionally, EVs can be charged overnight from an EV user's home.*

For those living in multi-unit dwellings or lacking off-street parking, the NCCTP's Infrastructure Key Recommendation #1's Supporting Strategies covers a strategy to consider charging infrastructure needs of these types of consumers.

Equity

Comment Summary

There were 33 responses received relating to equity. A majority of the comments expressed concern that traditionally underserved communities would not be appropriately included in the development and deployment of the NCCTP's strategies. Recommendations on how to equitably include these populations were provided from the public feedback. Overall, the types of comments received were as follows:

1. Community-based organizations from traditionally underserved communities and relevant expertise should be consulted in the development of equity metrics
2. Equity metrics should also include metrics and established milestones to track progress and strengthen accountability (other specific equity metrics were suggested for consideration)
3. Improve equity and inclusion in communication and engagement strategies (specific examples were provided)
4. Adoption of EVs will be difficult for those from low- and middle-income households
5. Older populations should be considered under the category of traditionally underserved populations
6. Prioritize communication and engagement with traditionally underserved communities and rural communities
7. Include more pictures of diverse individuals using alternative modes of transportation throughout the plan
8. Replace the word Native American with American Indian in the CTP

Responses

1. *The NCCTP Governance Activity #3's Supporting Strategy will be edited to include partnership and consultation with community-based organizations, stakeholder groups, and appropriate experts when developing equity metrics. This strategy will be moved to the State Action subsection.*
2. *The NCCTP Governance Activity #3's State Action will be edited to include a "Progress-tracking" metric to ensure milestones are being met and accountability over the timeline of a project. The NCDOT and Interagency Taskforce will consider the specific equity metrics suggested through the public feedback and strategize where they may fit under the plan's specified anticipated metrics.*
3. *The NCCTP Communication and Engagement Key Recommendation will be edited to include some of the suggested edits to better incorporate equity in the coordinated communication strategies. Some of these edits include:*
 - a. *Conducting workshops and other education activities in coordination with local community leaders*
 - b. *Bringing in diverse speakers and local community leaders to address community-specific challenges*

More suggestions were provided through public feedback and will continue to be considered when developing and deploying the planned coordinated communication strategy.

- 4. As part of the NCCTP's Governance Key Recommendation #4, the NCDOT Clean Transportation Team and the NCCTP Work Groups will continue researching the best ways to improve EV affordability for traditionally underserved populations through rebates, incentives, leasing options, and other support.*

Additionally, NCDOT and the Interagency Task Force will promote the benefits of EVs and available rebates, incentives, leasing options, and other support through its coordinated community strategy as outlined in the Communication and Engagement Key Recommendation.

- 5. As part of the NCDOT's Title VI Nondiscrimination Policy Statement, the NCDOT will "ensure that no person shall, on the ground of race, color, national origin, limited English Proficiency, income-level, sex, **age**, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any NCDOT program or activity, including where applicable, religion." This statement is on pg. 7 in the Clean and Equitable Transportation of the NCCTP Draft released on March 1st, 2023.*

While the elderly are not included in the plan's definition of traditionally underserved communities, they are a group lacking access to transportation and the NCCTP's initiatives will work to improve conditions to meet the elderly population's unique needs. Title VI of the Civil Rights Act of 1964 applies to all state agencies. Title VI of the Civil Rights Act of 1964 applies across all state agencies.

- 6. One of the core focuses of the NCCTP is to ensure the plan's initiatives are achieved and conducted in an equitable and inclusive manner. The plan addresses how it will work towards equitable outcomes and prioritize traditionally underserved communities and rural communities through its various key recommendations and will edit some key recommendations' State Actions and Supporting Strategies using the public feedback to further ensure equitable outcomes are achieved and the needs of traditionally underserved communities and rural communities are appropriately met.*

The CTP's Governance Key Recommendation #1 will be edited to include a State Action item to include and support traditionally underserved communities on clean transportation priorities, including engaging with communities to identify community-level transportation needs and priorities and aligning those needs with available state and federal funds.

- 7. The CTP team incorporated more pictures of diverse individuals using alternative modes of transportation in the CTP summary report.*
- 8. The CTP team replaced the word Native American with American Indian throughout the CTP summary report and Work Group Plans.*

Funding

Comment Summary

There were 145 responses received relating to the funding key recommendations and other financial elements of the NCCTP. A majority of the comments urged NCDOT to prioritize funding modes of travel that will reduce VMT, increase transit options and infrastructure, and increase bike and pedestrian infrastructure. Comments also suggested the NCCTP list out the specific sources of funding that will be relied upon to progress the strategies of the NCCTP. Overall, the types of comments received were as follows:

1. Specific sources, such as IJJA funding sources, for how the state will fund its proposals should be explicitly stated
2. Evaluate and apply for all available funding sources that leverage IJJA investments
3. Modifying the State Transportation Improvement Program's prioritization equation to support transit and non-motorized modes of travel
4. Prioritize investments in multimodal transportation infrastructure over highway and road widening projects
5. Recalculate or remove the additional EV fee included in the yearly vehicle property tax and consider additional state tax breaks for those who purchase EVs
6. Address funding limitations that prevent equitable access to all types of transportation options
7. Fund reliability improvements for the utility sector
8. Invest in further research to improve bike and ped safety needs and conditions
9. Include an e-bike incentive program
10. Incentivize state employees to use other modes of travel

Responses

1. *Current and anticipated funding sources are specified in the NCCTP in both the Funding and Finance Key Recommendations. Funding sources specified include the Congestion Mitigation and Air Quality (CMAQ), Carbon Reduction Program (CRP), Diesel Emissions Reduction Act (DERA), Inflation Reduction Act (IRA), Infrastructure Investments & Jobs Act (IJJA). The NEVI program will be added as another current funding program in Funding and Finance Key Recommendation #1.*
2. *As part of Funding and Finance Key Recommendation #2, applicable federal funding opportunities under the IJJA will be evaluated by NCDOT and the Interagency Task Force.*
3. *The NCCTP's Governance Key Recommendation #4 will guide the NCDOT in evaluating the STI normalization process and strategizing how to provide a higher percentage of funding for non-highway projects which promote clean transportation strategies and meet transportation needs.*

These types of non-highway projects include non-motorized modes of travel. In the same key recommendation, "Removing barriers to funding standalone multimodal projects" includes removing barriers to funding independent bike and pedestrian projects and will be researched as part of the Supporting Strategies.

4. *The allocation of funds between modes is governed by the STI legislation. As part of that legislation a Workgroup is convened on a recurring basis to review the process and make adjustments. These recommendations should be sent to the Prioritization Workgroup.*
5. *The NCDOT does not have jurisdiction or the ability to modify state tax breaks or property tax formulas.*
6. *As part of the CTP's Communication and Engagement Key Recommendation, the NCDOT and Interagency Task Force will support a coordinated communication strategy to provide technical resources and services to communities to support and guide them in acquiring clean transportation-related funding.*

As part of the CTP's Governance Key Recommendation #4, the NCDOT Clean Transportation Team and the NCCTP Work Groups will continue researching the best ways to improve EV affordability for traditionally underserved populations through rebates, incentives, leasing options, and other support.

7. *As part of the NCCTP's Governance Key Recommendation #6, the Interagency Task Force will partner with electric utilities to encourage funding for clean energy and clean transportation infrastructure. This includes improvements to the current infrastructure to handle the transition to clean transportation.*
8. *Connecting people, products and places safely is a major focus on NCDOT's mission, and this mission is incorporated in all aspects of planning and implementation. As such, while safety is an overarching concern, the NCCTP will not develop recommendations specific to safety as the focus of the plan is on emission reductions.*

However, the NCCTP will be edited to include a new supporting strategy under Infrastructure Key Recommendation #2. This new supporting strategy will recommend NCDOT coordination with MPOs, RPOs, and other relevant stakeholders to improve quality of crash data and exposure data for rural and urban contexts. The crash data may include crash frequency, severity of the crash, injury patterns, contributing factors, and crash types. The exposure data may include volume of crashes, severity, and occurrence.

9. *The CTP will be edited so that electric bikes are outlined as a part of the term "bike" or "bicycle" throughout the report. Therefore, when the plan discusses efforts to prioritize and fund bicycle projects, this includes e-bike projects.*
10. *The CTP's Infrastructure Key Recommendation #2 will be edited to include a State Action to incentivize state employees to use VMT-reducing modes of travel (e.g. carpool, bus, bike, walking).*

General

Comment Summary

There were 52 responses that were categorized as general comments. The majority of these comments expressed general support of dissatisfaction towards the plan or current state government administration with no specific suggestions, in terms of editing the plan's content, provided. Only a few specific content edits that related to wording edits were suggested:

1. Removing the word “progressive” from pg. 34 of the NCCTP Draft document
2. Use language in the key recommendations that express a stronger commitment (e.g. ensure)
3. Include a telework statistic to pg. 11’s figure
4. Include other carbon-neutral fuel sources when discussing alternative fuel sources

Responses

1. *The word “progressive” will be removed from the requested page.*
2. *The CTP team has written the report with the minimum level of commitment that the NCDOT and Governor’s Office can guarantee as of this time.*
3. *A telework statistic is already provided in the footnote of pg. 11’s “How we travel to work” figure.*
4. *An “Alternative Fuels” glossary term will be added to the CTP. This definition will be pulled from the Environmental Protection Agency’s definition of alternative fuels which is as follows:*
 - a. *These fuels include gaseous fuels such as hydrogen, natural gas, and propane; alcohols such as ethanol, methanol, and butanol; vegetable and waste-derived oils; and electricity.*

When alternative fuels are referred to throughout the CTP, it will be referring to the fuel sources listed in this glossary definition which includes low- and zero-emission fuels.

Governance

Comment Summary

There were 13 responses relating to the governance key recommendations and other governance-related elements in the NCCTP. Many governance-related comments requested the plan address specific elements and funding sources for the NCDOT’s new Clean Transportation Team. Overall, the types of comments received were as follows:

1. Clearly state the following for the Clean Transportation Team
 - a. Team members
 - b. Quantity of positions
 - c. Roles of the positions
 - d. Budgetary allocation and source of funding needed to support the team
2. The Clean Transportation Team should have a core responsibility to include traditionally underserved communities
3. Train staff involved in transportation planning and the clean transportation plan to incorporate the NCCTP’s recommendations and goals into decision-making
4. Pursue more programs reducing vehicle miles traveled
5. The interagency task force should be convened by the Governor’s Office instead of the NCDOT

Responses

1. *The NCDOT Clean Transportation Team's anticipated members, quantity of positions, roles of the positions, budgetary allocation, and source of funding cannot be specified at this time. However, a budget proposal was recently submitted to develop and fund the new Clean Transportation Team.*
2. *The NCCTP's Governance Key Recommendation #1 will be edited to include a State Action item to include and support traditionally underserved communities on clean transportation priorities, including engaging with communities to identify community-level transportation needs and priorities and aligning those needs with available state and federal funds.*
3. *The NCDOT will work with its internal departments, such as the Office of Civil Rights, to train its staff so that the NCCTP's strategies and goals can be advanced.*
4. *The NCCTP's Governance Key Recommendation #1 will be edited to include a State Action item to annually track and report on key metrics including Executive Order goals, GHG remission reductions, equity objectives, **VMT reduction targets** and other metrics as appropriate.*

The NCCTP's Governance Key Recommendation #4 will guide the NCDOT in evaluating the STI normalization process and strategizing how to provide a higher percentage of funding for non-highway projects which promote clean transportation strategies and meet transportation needs. These types of non-highway projects focus on VMT-reducing modes of travel.

As part of the CTP's Infrastructure Recommendation #2, VMT-reducing programs and infrastructure projects will be promoted and pursued.

5. *The Governor's Office has directed that the NCDOT will be convening the Interagency Task Force.*

Land Use

Comment Summary

There were 28 responses relating to land use suggestions that should be incorporated in the NCCTP. These suggestions included:

1. Discourage car dependency by incentivizing transit-supporting housing development
2. Modify land use patterns to support high-density communities that support multimodal travel modes
3. De-prioritize highway and road-widening projects

Responses

1. *The NCDOT has no jurisdiction over housing development plans and cannot incorporate the suggestion into the NCCTP.*
2. *The NCDOT has no jurisdiction over land use patterns and land development decisions, and cannot incorporate the suggestion into the NCCTP.*

3. *NCDOT is subject to the STI Law that provides the framework for selection criteria for infrastructure investment. The allocation of funds between modes is governed by the STI legislation. As part of that legislation a Workgroup is convened on a recurring basis to review the process and make adjustments. These recommendations should be sent to the Prioritization Workgroup.*

Rail

Comment Summary

There were 6 responses expressing that the NCCTP failed to address freight rail in the plan and support for rail electrification.

Response

A new section will be added highlighting non-EV, alternative modes of travel. This new section will focus on the alternative modes of travel that do not pertain to operating a single-occupancy vehicle and will reduce VMT. These modes of travel include rail, bus, ferry, carpooling, biking, and walking. In this new section, freight rail will be addressed and a specific example of ongoing freight rail electrification efforts will be included as well.

Transit

Comment Summary

There were 123 responses relating to public transit elements of the NCCTP. A majority of public transit comments expressed a need for more public transit efforts in urban and rural areas statewide. Overall, the types of comments received were as follows:

1. Increase clean public transit options (such as rail) in urban and rural areas
2. Consider target goals for zero-emission public and transit vehicles
3. Emphasize a focus on public transit supportive infrastructure
4. Support bus and commuter rail electrification

Responses

1. *Expanding freight rail and public transit infrastructure is addressed in the NCCTP's Infrastructure Key Recommendation #2. These efforts include both urban and rural contexts.*
2. *Electrification of state fleets and transit vehicles (medium- and heavy-duty) and target goals are already specified as part of Executive Order 271.*
3. *The CTP team will create a new section highlighting non-EV modes of travel. This new section will focus on the alternative modes of travel that do not pertain to operating a single-occupancy vehicle and will reduce VMT. These modes of travel include rail, bus, ferry, carpooling, biking, and walking.*
4. *The NCDOT supports transit electrification through providing funding and encouraging transit systems to consider electrification.*

Vehicle Miles Traveled (VMT) Reduction

Comment Summary

There were 115 responses relating to efforts to reduce VMT and to increase multimodal travel methods. Overall, the types of comments received were as follows:

1. Emphasize a focus on VMT reduction, public transit, and bike and pedestrian supportive infrastructure
2. Increase clean public transit options in urban and rural areas
3. Prioritize pedestrians, cyclists, non-vehicular modes of travel, and public transit in municipal development
4. Include a section at the beginning of the CTP explaining VMT and the importance of reducing it
5. NCDOT should reconstitute the VMT Taskforce
6. The Clean Transportation Team should be responsible for tracking and reporting VMT reductions
7. Electrification State Action and Supporting Strategies on pg. 29 of the plan should be moved to pg. 28

Responses

1. *The CTP team will create a new section highlighting non-EV modes of travel. This new section will focus on the alternative modes of travel that do not pertain to operating a single-occupancy vehicle and will reduce VMT. These modes of travel include rail, bus, ferry, carpooling, biking, and walking.*
2. *Expanding public transit infrastructure is addressed in the CTP's Infrastructure Key Recommendation #2.*
3. *The allocation of funds between modes is governed by the STI legislation. As part of that legislation a Workgroup is convened on a recurring basis to review the process and make adjustments. These recommendations should be sent to the Prioritization Workgroup.*
4. *This new section will be added to the CTP. (See **Vehicle Miles Traveled (VMT) Reduction Response #1**)*
5. *The CTP's Infrastructure Key Recommendation #2 State Action will be edited so that it clearly states the NCDOT will reconstitute the VMT Taskforce.*
6. *The CTP's Governance Key Recommendation #1 will be edited to include a State Action item to annually track and report on key metrics including Executive Order goals, GHG remission reductions, equity objectives, **VMT reduction targets** and other metrics as appropriate.*
7. *The State Actions and Supporting Strategies relating to electrification efforts on pg. 29 of the plan will be moved to pg. 28 as recommended.*