

March 15, 2023

Via e-mail

Secretary J. Eric Boyette
North Carolina Department of Transportation
1 South Wilmington Street
Raleigh, NC 27601
NC-Clean-Transportation@PublicInput.com

**Re: Comments on NCDOT's Clean Transportation Plan related to Reducing
Vehicle Miles Traveled**

Dear Secretary Boyette,

Thank you for the opportunity to comment on the draft North Carolina Clean Transportation Plan. We appreciate the work that has gone into this draft, particularly the effort by NCDOT's staff and consultants to be responsive to feedback from the workgroups and Advisory Committee. While this draft incorporates many of the important ideas coming out of this inclusive process, it requires significant change before submission to the Governor.

The current draft misses the mark set out in Executive Order 246, where Governor Cooper directs the Department of Transportation to come up with a plan that recommends "*actionable strategies, with an emphasis on near-term action*, for decarbonizing the transportation sector" (emphasis added). We are concerned this document is simply a "plan to make a plan," which will not result in the tangible outcomes needed to meet North Carolina's climate goals. We encourage NCDOT to make changes so the final plan assigns responsibility to specific people with dedicated time, resources, and skills necessary to accomplish concrete goals.

Climate change is not an issue we can wait to address. The Administration has recognized the seriousness of the climate crisis in the executive orders on climate change the Governor has issued over the past four and a half years—starting with Executive Order 80 in October 2018, then Executive Order 246 in January 2022, and Executive Order 271 in November 2022. In Executive Order 246, the Governor committed to reducing statewide greenhouse gas emissions 50 to 52 percent below 2005 levels by 2030 and net-zero emissions by 2050.¹ The Department of Transportation has been working diligently for the past fourteen months to come up with this Clean Transportation Plan. North Carolina has spent more than enough time preparing to tackle the problem—now is the time for action.

This plan needs to meet the urgency of the moment with proactive short- and long-term strategies that can actually be implemented based on the reality of what we know about North Carolina. The plan needs to provide clear leadership to ensure the State's transportation sector

¹ E.O. 246, Section 1(a).

(currently the leading contributor to greenhouse gasses in North Carolina) can be swiftly transformed to a cleaner future and assist North Carolina in meeting its ambitious climate goals. The current plan does not provide this leadership. Instead, the plan suggests assembling teams and task forces sometime over the next three years to “research,” “assess,” “evaluate,” “review,” and “explore” a range of strategies that might eventually be implemented. The plan can do better. Over the past year, the workgroups have assembled expertise that can provide the basis for a set of specific actions the Administration can take in the next few months to start to move North Carolina forward.

These comments focus primarily on the parts of the plan geared toward reducing vehicle miles traveled. We also are fully supportive of the Administration’s efforts to electrify North Carolina’s transportation sector and the Administration’s work to promote equity and inclusion and endorse the comments submitted by the Natural Resources Defense Council.

I. The Importance of Reducing Vehicle Miles Traveled

Reducing the number of vehicle miles driven is a critical strategy for reducing greenhouse emissions in North Carolina. While electrification will play an important role in emissions reduction, studies confirm electrification alone will not resolve the climate crisis.² The vast majority of the cars and trucks on the road today are still powered by climate-polluting fossil fuels, and any near-term solutions must include a strong focus in reducing emissions from those vehicles—that means less driving.

Reducing vehicle miles traveled is challenging because driving is so heavily ingrained as the primary (and often only) mode of transportation. In most places around North Carolina, people need cars to get around. Many communities lack the multimodal infrastructure required to make the shift from driving to other, less polluting modes of transportation. And many people need to drive long distances to access jobs, healthcare, and other services. Big systematic changes need to happen to reduce vehicle miles traveled—from reprioritizing the transportation budget so more money is spent on multimodal infrastructure, to reforming land use laws to encourage the development of denser, more connected communities. But smaller local changes, like the addition of a bike lane or a telework policy, can also begin to make a big impact as these projects increase in number with better State support.

In addition to the concrete actions discussed below, the plan should include a more nuanced discussion of all these issues related to vehicle miles traveled to promote better understanding both internally at NCDOT and externally for other agencies, legislators, and the general public, of why these measures reducing vehicle miles traveled are so essential.

Finally, there are a few factual references in the plan that should be reframed to more accurately describe current conditions. On page 8, the plan mentions North Carolina is mostly made up of rural communities, which is true but may create a misconception that most North Carolinians live in rural communities, which is not the case. As of July 1, 2019, the majority of

² RTI International, *Evolving Transportation In North Carolina* (2020), https://legacy.uploads.southernenvironment.org/publications/Transportation_Report_0120_web_F.pdf.

North Carolina's population (57 percent) lived in urban areas.³ On page 11, the infographic about access to vehicles is misleading because it refers to the whole population—including people younger than 16, who cannot drive. It would be more informative if it referred to households rather than people.

Suggested changes:

1. Include a section in the beginning explaining the concept of vehicle miles traveled and why reducing vehicle miles traveled is important for both greenhouse gas reductions and equity. It would also be useful to more clearly explain how improved safety (e.g. decline in traffic injuries and deaths) and reduced maintenance costs intertwine with reduced vehicle miles traveled reduction and increased multi-modal infrastructure. This section should include the current measure of vehicle miles traveled per licensed driver in North Carolina, the rate of change over time, and how North Carolina compares nationally.
2. Include the vehicle miles traveled reduction targets NCDOT is required to set by law⁴ as well as a plan to achieve them.
3. In this initial opening, explain how vehicle miles traveled reductions interact with both transportation and land use policy and involve the work of many levels of government, as described above.
4. While the VMT reduction study and tool kit are helpful, they haven't been widely distributed. On page 29, the plan would benefit from better explanation as to how the VMT reduction tool kit could be employed by the state, cities, and MPOs to reduce vehicle miles traveled as part of meeting the goals set out in the plan.
5. The plan references the VMT taskforce (page 17), which only met twice and took no action. This reference should be revised to include information on NCDOT's plans for reconstituting the VMT taskforce.
6. Edit the discussion of urban and rural communities on page 8 to clarify while much of North Carolina is rural, most people live in urban areas.
7. Edit the infographic on page 11 to focus on household access to vehicles, rather than the general population.

³ N.C. Office of State Budget and Management, *Is North Carolina Rural or Urban?* (Nov. 19, 2020), <https://www.osbm.nc.gov/blog/2020/11/19/north-carolina-rural-or-urban>.

⁴ 540 Settlement Agreement at ¶ A(15), <https://www.ncdot.gov/projects/complete-540/Documents/complete-540-settlement-agreement.pdf>.

II. Accountability

The draft plan lacks accountability. While accountability is cited as an expectation of the executive orders, e.g. page 3, there is little detail given on how accountability will actually be accomplished. We appreciate efforts made to establish some level of accountability—notably the distinction between “State Action” versus other supporting strategies to be accomplished by other partners, the creation of a dedicated clean transportation team, and the identification of “near-term” and “mid-term” timeframes, but they fall short of making this document an actionable plan. The plan needs to actively give NCDOT directive, rather than sit on a shelf.

For example, the activities listed under “State Action” by and large are not specific actions that will reduce vehicle miles traveled or promote equity. Instead, they are plans to “convene” meetings; “review” policies; and “involve” various stakeholders to “inform” policies. The recommendation most likely to move the needle on vehicle miles traveled—changes to project prioritization—includes plans to “identify” (but not use) metrics; “review” (but not implement) best practices; “evaluate” and “research” (but not modify) the prioritization process; and “research” (but not change) normalization percentages. None of these actions by themselves will reduce vehicle miles traveled. If the State does not commit to taking specific action, it cannot be held accountable. Commitment to specific actions now will also help ensure the plan’s longevity for future administrations. See section V below for more detailed comments on the plan’s recommendations.

We also appreciate the recommendation to create a clean transportation team, but the plan should include some structure for the team, including who is on this team. NCDOT staff serving on this team should also receive dedicated time and resources for plan implementation. The plan should identify the time and resources that will be made available to support this effort. See section V(a) below for additional comments on this recommendation.

We appreciate the shift of some responsibility from workgroups to this internal clean transportation team. There is, however, still a big expectation that the workgroups will continue beyond the plan. While we see the value of maintaining an advisory committee with State agency leads and stakeholder representatives to provide expertise, track progress, identify needs, opportunities, etc., the executive branch cannot outsource implementation and decision-making to workgroups. We know this is not the intent but trusting the success of the Clean Transportation Plan to groups of to-be-determined volunteers will be perceived as the State skirting its responsibility to invest in and deliver on the executive order commitments this plan’s strategies build upon. To a certain extent, this already happened with the formation of the plan. Rather than having a streamlined, targeted stakeholder process that sought expertise and support for specific, actionable strategies, the Department used the workgroup process to crowdsource ideas for the plan and ended up with an unwieldy list of strategies in the work group plans, too numerous or vague to be very useful. While we agree an inclusive approach is important, the Department must show leadership and apply its technical expertise in crafting and implementing the plan. At the very least, the plan should identify a small list of skilled stakeholders willing to engage and take responsibility for part of the process going forward.

We also appreciate the inclusion of timeframes for each recommendation, but the timeframes are too long-ranging. The near-term timeframe should take place within the next year—not the next three years, and the mid-term timeframe should take place within the next two to three years. Climate change is a challenge requiring an urgent response, and the Administration must act swiftly—particularly if it is going to meet its climate commitment of reducing statewide greenhouse gas emissions 50 to 52 percent below 2005 levels by 2030 and net-zero emissions by 2050.⁵ As the Intergovernmental Panel on Climate Change has warned, the next few years are crucial—if we want to avoid disastrous consequences and achieve net-zero by 2050, emissions must begin to decline by 2025 at the latest and be reduced to 43% by 2030.⁶ This means the time to act is now. There’s no time to waste.

Finally, it is important for the plan to differentiate between actions the Administration can accomplish based on current law, and actions that will require legislative change. This report is, after all, a report from the executive branch. This differentiation is important to set clear expectations for stakeholders, including the public, to understand which goals the executive branch can accomplish more immediately on its own and which goals will require broader participation—including legislative approval. The people tasked with plan implementation should begin implementing executive branch changes immediately, for example modifications to the prioritization process described below, such as adjusting the normalization percentages to shift more funds to non-highway projects. At the same time, NCDOT staff and the interagency taskforce must also get to work immediately on the parts of the plan needing legislative approval, which will require the Governor, state agencies, and other stakeholders to advocate for change and may require a longer timeline than the actions the executive branch can implement immediately on its own. Distinguishing between executive and legislative actions will help clarify the path for plan implementation. See section V below for more specific comments on changes needed to make this clarification.

Suggested changes:

1. Revise the recommendation to create a dedicated clean transportation team (p. 20) to identify members of the team and the time and resources that will be made available to them for plan implementation, including any necessary budget amendments to accommodate the team.
2. Modify the timeframes defined on page 18 so that near-term represents the first year, and mid-term represents years two and three.
3. Commit to implementing concrete actions (or “strategies”) listed in under each key recommendation (pp. 20-31) that can be accomplished in the next year (i.e. activities that will create real change—not plans for further study)—see the

⁵ E.O. 246, Section 1(a).

⁶ IPCC, *The evidence is clear: the time for action is now. We can halve emissions by 2030* (April 4, 2022), available at <https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>.

sections below for specific recommendations related to reducing vehicle miles traveled.

4. Assign responsible actors other than the workgroups and more specific than “the State” and a deadline for each committed action (pp. 20-31).
5. Clarify which priority strategies require legislative action and commit to working with stakeholders to educate and advocate for legislation over the coming year, including incorporating these legislative changes in the Department of Transportation agency bill.

III. Measuring Progress

The plan should set forth key performance indicators to measure success. We are glad to see reduced vehicle miles traveled included as a measure of progress to be tracked in the list on page 3 of the draft plan. NCDOT is already required by law⁷ to collect and monitor data regarding the rates of VMT per North Carolina licensed driver and set targets for reduction. These data and targets are central to all VMT reduction efforts and should be included in the report. NCDOT already tracks this information and is supposed to have a target, so it should be readily available to include.

Suggested Changes:

1. Revise the language on page 3 to track “vehicle miles traveled (VMT) per *licensed driver*” or per capita rather than per vehicle. This will better ensure that we reduce driving and account for policies that allow people to give up vehicle ownership entirely.
2. Assign the clean transportation team responsibility on page 20 for tracking and reporting vehicle miles traveled reductions, see section V(a) below for more detail.

IV. The Plan’s “Key Recommendations”

The key recommendations listed on page ix and detailed on pages 20-31 help provide clear direction. The recommendations’ State Action and Supporting Strategies, however, oftentimes weaken the strength of the recommendation by calling for further study and deferring immediate action. In general, the activities listed on these pages should be revised to be action-oriented. We describe specific changes that could be made to the activities related to reducing vehicle miles traveled below.

⁷ 540 Settlement Agreement at ¶ A(15), <https://www.ncdot.gov/projects/complete-540/Documents/complete-540-settlement-agreement.pdf>.

Suggested changes on page ix:

To match our suggestions below, the recommendation summaries on this page should be revised as follows:

1. “Create a dedicated clean transportation team—This group will *receive resources and time for plan implementation* and be dedicated to advancing the NCCTP objectives, *implementing the plan, and tracking progress.*”
2. “Align statewide policy through an interagency task force—*This taskforce will coordinate plan implementation across the executive branch.*”
3. “Increase equitable outcomes in transportation planning projects—Introducing new *opportunities, empowering traditionally underserved communities* in transportation decision-making, *and focusing on maximizing key indicators like improved access* will lead to more equitable outcomes.”
4. “Evaluate and update project prioritization programs—*modify project evaluation and prioritization under the STI to increase funding available for non-highway projects.*”
 - a. **“Create a dedicated clean transportation team”**

As discussed above, we appreciate the identification of a clean transportation team, but the plan should include much more detail about it. NCDOT staff serving on this team must receive dedicated time and resources for plan implementation—this work must be an agency priority and needs to be fully resourced and staffed. The plan should identify the time and resources that will be made available to support this effort. To achieve what the plan is tasking the DOT team, it will need extensive expertise, including zero-emissions technologies, environmental justice, federal grant administration, community and stakeholder engagement, land-use planning, and multi-modal alternatives. Ongoing stakeholder workgroups can provide additional expertise and perspective but cannot be held accountable for plan success. NCDOT therefore must build and maintain a multi-person team dedicated to advancing holistic and equitable clean transportation. Without a formal commitment in the plan to do so, we fear this team will languish and plan implementation will falter.

Much of the success of the clean transportation team will depend on whether the plan is revised to include more specific actions than further studying, reviewing, and evaluating potential strategies. The plan needs to give the team clear direction so the team can actually “advance . . . track and communicate implementation.” The team should be responsible for leading these efforts, including making recommendations to the interagency task force when certain measures require collective action across the executive branch.

Training NCDOT staff will also be important for the plan’s success. The clean transportation team should be responsible for this training. Training should be focused especially on key NCDOT staff, including everyone from policymakers to engineers. Staff will

need to be trained on topics like assessing climate impacts in planning and design, serving traditionally underserved communities, and promoting transportation demand management strategies. The plan should be more specific about who will be trained, how, and within what timeframe.

Finally, including traditionally underserved communities in clean transportation opportunities should not be an action left only to the interagency task force (first bullet point on page 21) but should be a core responsibility of NCDOT's internal clean transportation team. As an equity priority within the plan, the State should deliver effective engagement to underserved community to identify community-level transportation-related needs and priorities, align those with available State and federal funds, prioritize and support grant applications to draw down funds to meet identified community needs and priorities and ensure Justice40 expectations are met.

Suggested changes on page 20:

1. Revise the language under State Action to identify dedicated members of the team.
2. Add a bullet, committing to dedicating time and resources for plan implementation, including any necessary budget amendments to accommodate the team.
3. Add a bullet, requiring the team to *“Train staff involved in transportation planning on the clean transportation plan, so they incorporate the plan’s recommendations and goals into decision-making.”*
4. Add a bullet, requiring the team to *“Include and support traditionally underserved communities on clean transportation priorities, including engaging communities to identify community-level transportation-related needs and priorities, align those needs with available State and federal funds, and prioritize and support grant applications for those funds.”*
5. Add a bullet, requiring the team to *“Track and report progress, including vehicle miles traveled reductions, funds spent on clean transportation projects compared to other projects, and greenhouse gas emissions reductions.”*
6. Revise the fourth bullet point under State Action to say, *“Convene and facilitate the Interagency Task Force (outlined in the next page) and make recommendations to the taskforce for plan implementation.”*

b. “Align statewide policy through an interagency taskforce”

While we appreciate this recommendation—particularly because an interagency taskforce will be needed to coordinate agencies to actually implement the plan across the executive branch—the taskforce will be more effective if it is convened by the Governor’s office rather than the Department of Transportation. This is an opportunity for Governor to demonstrate strong, direct leadership to advance executive priorities. In addition to the responsibilities listed, this taskforce should also obtain resources for plan implementation.

Suggested changes on page 21:

1. Revise so the Governor’s office is responsible for convening the taskforce.
2. Revise to move the numbered responsibilities within the introductory paragraph (“(1) clarify responsibility...”) to be action bullet points below.
3. Add a bullet point for “*Obtain resources for plan implementation, including making necessary changes to agency budgets.*”

c. “Increase equitable outcomes in transportation planning projects”

This recommendation is a strong start but could still be improved in a few important ways. First, the draft plan still fails to articulate or commit to measurable equity goals. The actions listed are good and necessary, but they aren’t enough to make any real change. Instead of stopping at “involving” partners and identifying metrics, the State should commit to concrete action, such as committing a percentage of its budget to transportation disadvantaged areas or providing technical support and other resources to build transportation policy capacity in communities, so that communities are empowered to participate in the process and build their own transportation solutions. The commitments set forth in the plan should lead to measurable improvements to the systemic unjust actions and harms identified on page 6 of the plan by establishing transparent and resourced policies and programs that address the challenges and deliver change to these communities.

Second, the “equity metrics” bullet point under State Action lists three types of metrics, none of which are substitutes for measuring equitable *outcomes* of the transportation system as a whole, which are what really matter to North Carolinians. At a minimum, the State should be looking at access to jobs, schools, affordable housing, healthcare, grocery stores, and other services; access to non-single-occupancy modes of transportation; and traveler safety. Others could be added. These measures are especially critical when considering strategies to reduce vehicle miles traveled. Most North Carolinians lack any choice over their mode of transportation—driving is the only option, and this disproportionately harms traditionally underserved communities because they often lack the resources to own, maintain, or drive a car and live in neighborhoods further from jobs and other services, increasing the cost of travel. If North Carolina is going to ensure equitable outcomes for projects aimed at lowering vehicle miles traveled, it must understand all these forces at play by using metrics that measure outcomes in a more targeted way.

Suggested changes on page 22:

1. Revise the second bullet to say, “*Using equity metrics...*” and add outcome metrics, including at a minimum, access to jobs, schools, affordable housing, healthcare, grocery stores, and other services; access to non-single-occupancy modes of transportation; and traveler safety.

2. Add bullet points under State Action for actions that will advance equity in measurable ways, including for example, committing a specific percentage of the budget to transportation disadvantaged communities or providing resources to build community capacity.
3. Move the first bullet point under Supporting Strategies into State Action, and revise so it is a State commitment rather than a partner activity—“*Create new engagement...*”
4. Revise the Supporting Strategies to clarify who will be partnering with whom. For example, who is partnering with CBOs to help ensure the transition to clean transportation? If the State is partnering with CBOs, then this bullet should be moved under State Action and reworded to be more action-oriented (e.g. “*Ensure the transition to clean transportation occurs...*”). The same applies to all other bullet points in this subsection.

d. “Evaluate and update project prioritization programs”

Prioritizing clean transportation projects is the most critical step the State can take in the next year to reduce vehicle miles traveled, and we are glad to see reforming project prioritization is highlighted as a standalone recommendation in the plan. Nonetheless, this recommendation fails to make a commitment to actually change State practices to prioritize these projects. Several ways to change the current STI prioritization process were identified during the stakeholder process. Executive branch proposals include changing the normalization process to give more funding to non-highway modes and changing the way that current scoring metrics are quantified and changing the percentages applied to the scoring metrics currently listed in law. Legislative proposals include the removal of funding limitations for specific types of projects and changes to prioritization scoring metrics to align with the plan’s goals. This draft plan, however, only recommends the state “review,” “evaluate,” and “research” these changes when they should have been reviewed, evaluated, and researched over the past year. Now is the time to commit to action that will have impact. Instead, the plan kicks this important measure down the road.

Working closely with the SPOT workgroup is crucial, and the SPOT workgroup should have been consulted in the process of putting together this plan. NCDOT may be further in the process of achieving these goals than the plan drafters are aware. At the Board of Transportation meeting on March 1, 2023, NCDOT staff reported the workgroup is modifying the normalization percentages and would ultimately like to eliminate the mode split in future prioritization cycles.⁸ This plan should reflect and build on these commitments.

⁸ Board of Transportation Work Session, (March 1, 2023), <https://livestream.com/nc-dot/events/10783764/videos/235239867> (at 19:10-20:30).

Suggested changes on page 24:

1. Revise the State Action bullet points to be action-oriented:
 - *“Implement best practices...”*
 - *“Adopt STI prioritization scoring metrics that improve equity...”*
 - *“Modify project evaluation and funding prioritization programs to include criteria...”*
 - *“Alter the STI normalization process to dedicate a higher percentage of funding for non-highway projects...”*
2. Add requiring MPOs and RPOs to update plans as a State Action: *“Require updates to all Comprehensive Transportation Plans at MPOs and RPOs throughout the state to align them with the goals of the Clean Transportation Plan by 2027.”*
3. Revise the Supporting Strategies bullet points to clarify where legislative change is required:
 - *“Review land use policies and work with local governments to support multimodal travel modes...”*
 - *“Advocate for legislative action to remove barriers to funding...”*
4. Add changes to STI criteria as supporting strategies:
 - *“Advocate for legislative action to change STI scoring criteria so that criteria like reductions in vehicle miles traveled and environmental quality (including greenhouse gas emissions) are scored.”*
 - *“Advocate for legislative action to change STI scoring criteria to eliminate the distinction between non-highway and highway projects, so that all projects are scored with the same metrics and can directly compete for funds.”*
5. Revise the pull-out section on “Why this is important” to be action-oriented and reflect a commitment to altering the prioritization process, rather than a plan to make more plans.
 - e. **“Maximize existing funding” and “Evaluate new funding”**

The recommendations on pages 26-27 are important because there is no doubt additional funding is needed to meet the goals of the plan. These recommendations are consistent with Executive Order 246, which directs agencies to expend federal funds on projects that will reduce greenhouse gas emissions, promote resilience, and support equity.⁹ In addition to the State Actions and Supporting Strategies already listed, the plan should also commit to (1) limiting the practice of “flexing” money from these federal programs to other projects that do not promote

⁹ E.O. 246, Section 10.

clean transportation, and (2) making funds available to assist communities with local match requirements. These actions will help North Carolina take full advantage of new and existing federal programs.

In addition to these measures, the Department of Transportation should support legislative change that would allow counties to impose a one cent sales tax to raise funds for transportation projects. Currently counties can impose a tax of one quarter of a cent, and an increase in this amount would allow localities with more expensive transportation needs to raise funds for the projects they would like to pursue.

Finally, the State should not prioritize electrification over reducing vehicle miles traveled. These goals should be pursued concurrently and equally. As explained above, electrification is only part of the equation—North Carolina cannot reach its climate goals with electrification alone and must pursue—and adequately fund—measures that will reduce driving.¹⁰

Suggested changes on pages 26 and 27:

1. Revise the recommendation on page 27 to be more action-oriented—rather than “evaluate” funding, the state should “*Leverage new funding...*”
2. Add a bullet point under State Action to “*Eliminate (or strictly limit) the practice of flexing money from federal programs to other projects that do not promote clean transportation.*”
3. Add a bullet point under Supporting Strategies: “*Support a line-item in the North Carolina budget to create a fund to support local match requirements for federal discretionary grants awarded to clean transportation projects.*”
4. Add a bullet point under Supporting Strategies on page 26: “*Support legislative action increasing local authority for counties to impose a sales tax for transportation projects to one cent.*”
5. On page 26, move the Supporting Strategies to State Action. These are important actions for the State to take to improve equity while maximizing existing funding.
6. On page 26, revise the third bullet point to include investments that reduce vehicle miles traveled. Electrification should not be prioritized ahead of reducing vehicle miles traveled—these goals should be pursued equally. This point should say, “*Prioritize investment in other modes, travel demand management strategies, or electric vehicles and supporting infrastructure...*”

¹⁰ RTI International, *Evolving Transportation In North Carolina* (2020), https://legacy.uploads.southernenvironment.org/publications/Transportation_Report_0120_web_F.pdf.

7. Move the third, fourth, and fifth Supporting Strategies on page 27 to State Action under the recommendation on page 26—incentive programs and financial policies are important actions the State can take to maximize existing funding.
8. On page 27, move the sixth and seventh Supporting Strategies to State Action—technical support and funding opportunities will be key actions the State can take to leverage new federal funding.

f. “Expand transportation demand management strategies”

Along with increasing funding, State support for transportation demand management projects is critical for achieving reductions in vehicle miles traveled. As this recommendation is written, however, NCDOT fails to make a commitment to taking the lead on these strategies. This recommendation should be rewritten so that the State—not local governments—leads implementation. The State can do this with investment and other incentives.

Suggested changes on page 29:

1. Under State Action, revise the introductory sentence to say, “NCDOT should *invest in and prioritize* the transportation demand management programs outlined in the VMT reduction toolkit...”
2. Revise the State Action bullet points as follows:
 - “*Invest in* expanded infrastructure...”
 - “*Invest in* increased access to broadband infrastructure...”
3. Add a bullet point under State Action for incentivizing transportation demand management programs.
4. Move the third bullet point under State Action and all the Supporting Strategies to the recommendation for electrification on page 28. While providing charging infrastructure in park-and-ride lots and electrifying buses are important, they are not transportation demand management strategies.
5. Edit the fourth bullet point under State Action to incorporate safety: “Implement planned complete streets elements, including leveraging maintenance activities to add complete street improvements, and *prioritize the safety of all users, including those walking and biking, over roadway level of service in project design.*”

V. Conclusion

We appreciate the work that has gone into this draft plan and the inclusive drafting process. We ask NCDOT to revise the plan to include the concrete actions described above that can be accomplished—or at least started—within the next year. If the Administration wants to address climate change in a meaningful way that will have an impact, it must act quickly and

decisively. With the revisions discussed in these comments, this plan can be the roadmap for these actions. Thank you for considering our comments.

Sincerely,



Megan Kimball
Senior Attorney
Southern Environmental Law Center

John Tallmadge
Executive Director
Bike Durham

Deborah Dicks Maxwell
President
North Carolina NAACP

Kemp Burdette
Riverkeeper
Cape Fear River Watch

Claire Williamson
Energy Policy Advocate
NC Justice Center

Kathleen Shapley-Quinn
Executive Director
Carolina Advocates for Climate, Health, and Equity

Cynthia Satterfield
Chapter Director
Sierra Club (NC Chapter)

Jeff Robbins
Executive Director
CleanAIRE NC

Stan Cross
Electric Transportation Policy
Director
Southern Alliance for Clean Energy

Stuart Gardner
Director
Generation180

Nathan Spencer
Executive Director
WakeUp Wake County

Bob Wagner
Executive Director
MountainTrue

Omega and Brenda Wilson
Co-Founders
West End Revitalization Association

Patrick King, II
Southeast Mobility Choices Advocate
Natural Resources Defense Council

Grady McCallie
Policy Director
NC Conservation Network

Cc: Zach Pierce, Senior Advisor, Office of Governor Roy Cooper, zach.pierce@nc.gov
Ebony Pittman, DOT Environmental Justice and Equity Lead, ejpittman@ncdot.gov