



Appendix H

Environmental Justice Community Mitigation Plan





ENVIRONMENTAL JUSTICE (EJ) COMMUNITY MITIGATION PLAN

INTERSTATE 526 (I-526)

FROM PAUL CANTRELL BOULEVARD TO VIRGINIA AVENUE
NORTH CHARLESTON AND CHARLESTON, SOUTH CAROLINA



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1.0 INTRODUCTION

This document is part of the National Environmental Policy Act (NEPA) documentation being prepared for the proposed I-526 LCC WEST project. It contains references to supportive information contained in the Community Impact Assessment (CIA) found in Appendix D of the Draft Environmental Impact Statement (DEIS) prepared for the proposed project.

1.1 PROJECT IMPACT OVERVIEW

The South Carolina section of Interstate 26 (I-26) was completed in 1969 and served as the first major interstate to facilitate movement directly into and out of the Charleston and North Charleston peninsula. The construction of I-26, along with the construction of Interstate 526 (I-526) in the late 1980s, resulted in bifurcated neighborhoods in North Charleston. An insufficient amount of opportunities for residents to voice their concerns and a lack of community involvement/mitigation during these projects were contributing factors that helped foster the innate distrust between residents and government that continues to this day.¹ When the I-26 and I-526 transportation projects were constructed, low-income and minority residents felt they were not properly informed or assisted with relocation, and the selected alternative effectively bisected the existing communities.² By physically separating these neighborhoods, both interstates negatively impacted community cohesion and created a barrier effect that continues to prevent residents from accessing previously walkable recreational facilities, grocery stores and other community amenities.

Alternatives were developed that would avoid and minimize impacts to the maximum extent practicable; however, impacts would still be created by the proposed project. In addition to residential, commercial, and community facility displacements, the proposed project would further encroach upon low-income and minority (Environmental Justice (EJ)) populations in the immediate vicinity of the I-526/I-26 interchange and along I-526 in the vicinity of the W. Montague Avenue and Dorchester Road interchanges. The Environmental Justice (EJ) Community Mitigation Plan focuses on the impacted neighborhoods of Russelldale, Highland Terrace, Liberty Park, and Ferndale as these neighborhoods would experience a higher level of disproportionately high and adverse impacts. Residences in the Wando Woods and Camps neighborhoods would be displaced by the proposed project; however, these residences are relatively removed from their respective neighborhood cores which, aside from avoiding large scale impacts to the Wando Woods and Camps neighborhood, precludes the same level of community-wide mitigation proposed for the above-mentioned focus areas. The displacements in Wando Woods and Camps would be offset by the creation of quality affordable housing in the immediate vicinity of the project with comparable access to public transit and employment centers.

1.2 MITIGATION PLAN PURPOSE AND REGULATORY FRAMEWORK

The overarching goal of the I-526 LCC WEST EJ Community Mitigation Plan is to effectively mitigate project impacts to residents of the Ferndale, Russelldale, Highland Terrace, and Liberty Park neighborhoods as well as several homes on West and East Ada Avenue in the Wando Woods neighborhood and on Ozark Street and Seiberling Road in the Camps neighborhood in North Charleston.

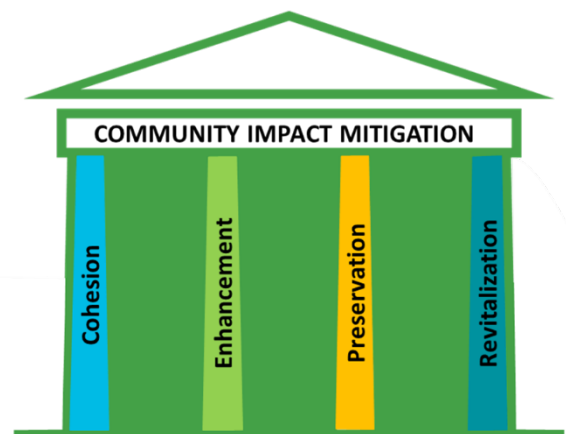
¹ Nonko, E. 2019. Trying Not to Repeat History on the East Side of Charleston. Next City. <https://nextcity.org/daily/entry/trying-not-to-repeat-history-on-the-east-side-of-charleston>.

² I-526 Lowcountry Corridor Community Advisory Council Meeting No. 4, Meeting Minutes. January 4, 2020.

It is important to identify and understand the challenges associated with developing and implementing an effective EJ mitigation plan. The primary barriers to meaningful engagement include lack of trust of government; limited awareness or information; limited access to technical and legal resources; language barriers; and limited transportation and/or childcare options.

A frequently unchallenged barrier is the issue of ownership and how to extend it to the community. Residents of impacted communities are often approached for input on a transportation project that may not be of relevance to that individual. The intent, therefore, should be to create a EJ Community Mitigation Plan that addresses the issues and priorities of the affected individuals, not only as a way to mitigate impacts, but most importantly as a way to convey ownership and work toward establishing a foundation of trust. The EJ Community Mitigation Plan was developed by first identifying and taking into consideration the social needs and priorities of neighborhood residents. Details on the Social Needs Assessment conducted for this project can be found Section 1.5.

Mitigation measures and agreements with local governments are being developed concurrent to the development of NEPA documentation for the proposed project. Additional details and new mitigation commitments may be added to this draft EJ Community Mitigation Plan as a result of the comments received from the public after the DEIS is published. The draft EJ Community Mitigation Plan will be presented to residents in affected EJ neighborhoods to gather feedback on proposed mitigation through a series of neighborhood meetings to be held during the public review period for the DEIS. Feedback received from EJ neighborhood residents will be used to refine the EJ Community Mitigation Plan. The refined draft EJ Community Mitigation Plan will be presented to affected EJ neighborhood residents for review and comment prior to its finalization and inclusion in the FEIS/ROD. The final EJ Community Mitigation Plan will catalog all agreements and plans required to implement the mitigation commitments. The final EJ Community Mitigation Plan will satisfy mitigation requirements under Executive Order (EO) 12898, USDOT Order 5610.2(a), FHWA EJ Order 6640.23A, Section 4(f), and Section 6(f).



1.3 MITIGATION FRAMEWORK

Four important elements to building or rebuilding a sustainable community are cohesion, enhancement, preservation, and revitalization. This EJ Community Mitigation Plan is framed around these four pillars, with the goal of developing mitigation measures that address each aspect of sustainability.

1.4 COMMUNITY ADVISORY COUNCIL

A Community Advisory Council (CAC) is a group of local citizens and other stakeholders that meet during the course of the project development process to discuss project-related issues and concerns. As part of the I-526 LCC WEST Environmental Justice (EJ) Outreach Strategy, a CAC was formed to facilitate meaningful engagement as intended under EO 12898, *Federal Actions to Address Environmental Justice to Minority and Low-Income Populations* and United States Department of Transportation (USDOT) Order 5610.2(a), *Final Order to Address Environmental Justice in Minority Populations and Low-Income Populations* thereby ensuring full and fair participation by all potentially affected communities in the transportation decision-making process.

The overarching roles and responsibilities of the CAC for the I-526 LCC WEST project are to:

- Share individual knowledge, experiences, and perspectives,
- Provide input on project-related impacts and proposed mitigation measures,
- Help give EJ neighborhood residents a strong voice in the process, and,
- Help get the word out about public meetings and other project-related information.

The CAC is comprised of residents that live in, have elderly family living in, or own property in the impacted EJ neighborhoods of Russelldale, Liberty Park, Highland Terrace, and Ferndale. The first CAC meeting was held on September 30, 2019. Subsequent meetings have been held monthly.

1.5 SOCIAL NEEDS ASSESSMENT SUMMARY

The CAC and residents of the EJ neighborhoods that participated in Community Drop-Ins and the Public Information Meeting or visited the Community Office were asked to complete a Social Needs Assessment (SNA). The purpose of this tool was to **provide a snapshot** of the norms, needs, and desires related to various social determinants and then to **rank the importance of and satisfaction with** each of the 25 categories.

A total of 47 EJ neighborhood residents from the four primarily impacted EJ neighborhoods completed the survey. All services and programs were considered important, with residents generally unsatisfied with current services and programs. The survey results shown in Table 1.1 illustrate how residents prioritize the 25 social need categories included in the survey. Top social needs priorities include infrastructure improvements related to stormwater management, bike/pedestrian facilities, and availability/quality of affordable housing followed by services for seniors and youth.

SNA Priority Rankings	Community Cohesion	Community Enhancement	Community Preservation	Community Revitalization
	FOCUS AREAS: Actions that strengthen neighborhood connections	FOCUS AREAS: Community center and recreational facility replacement	FOCUS AREAS: Infrastructure needs	FOCUS AREAS: Replacement housing and employment/economic opportunities
1-5	Community cohesion SNA topics did not rank (1-5)	<ul style="list-style-type: none"> • Services for seniors (5) 	<ul style="list-style-type: none"> • Adequate stormwater management (1) • Adequate Sidewalks/Bicycle Facilities (2) 	<ul style="list-style-type: none"> • Availability of quality housing (3) • Availability of affordable housing (4)
6-10	<ul style="list-style-type: none"> • Safety of Schools (10) 	<ul style="list-style-type: none"> • Services for youth (6) 	<ul style="list-style-type: none"> • Well-lit streets/sidewalks (8) 	<ul style="list-style-type: none"> • Quality of teaching at schools (7) • Appearance of neighbors' homes (9)
11-15	<ul style="list-style-type: none"> • City's response public service requests (15) 	<ul style="list-style-type: none"> • Supervised after-school activities (12) 	<ul style="list-style-type: none"> • Good grocery stores (13) • Public transportation and facilities (14) 	<ul style="list-style-type: none"> • Youth employment opportunities (11)
16-20	Community cohesion SNA topics did not rank (16-20)	<ul style="list-style-type: none"> • Nearby medical services (17) • Parks and recreation facilities (18) 	Community preservation SNA topics did not rank (16-20)	<ul style="list-style-type: none"> • Employment-assistance services (16) • Employment opportunities (19) • Small business opportunities (20)
21-25	<ul style="list-style-type: none"> • Emergency services response times (23) • Garbage collection frequency (25) 	<ul style="list-style-type: none"> • Quality of daycare centers (21) • Affordable daycare centers (24) 	Community preservation SNA topics did not rank (21-25)	<ul style="list-style-type: none"> • Ability to open a small business (22)

Table 1.1: The table above shows the Social Needs Assessment results ranked 1 (highest priority) through 25 (lowest priority) and grouped by EJ Community Mitigation pillar. Individual rank is in parentheses following each SNA topic description. The majority of identified needs fall under Revitalization and Enhancement.

2.0 MITIGATION MEASURES

Using the information collected from the CAC and the SNA, the project team coordinated with the CAC and the City of North Charleston to develop draft mitigation measures to best accommodate the needs and priorities of the impacted EJ neighborhoods.

Table 2.1 summarizes anticipated direct, indirect, and cumulative impacts to EJ neighborhoods, CAC feedback, SNA results, and mitigation proposed to address project impacts and community needs and priorities. Each mitigation measure is described in further detail in Sections 2.1 through 2.5.

Table 2.1: Mitigation Matrix

I. COMMUNITY COHESION: ACTIONS THAT STRENGTHEN NEIGHBORHOOD CONNECTIONS	
PROJECT IMPACTS	SCDOT COMMUNITY MITIGATION MEASURES
<ul style="list-style-type: none"> • <i>Adverse effects on community cohesion from original construction of I-26 and I-526</i> • <i>Adverse community cohesion effects associated with rezoning Russelldale neighborhood to “light industrial” use</i> • <i>Diminished economic vitality increases potential for further erosion of community cohesion as homeowners may sell to developers that do not reinvest in the current community</i> 	<ul style="list-style-type: none"> • Replacement Affordable Housing (rentals and owner-occupied) • Recreation Facilities and Amenities • Recreational Programs and Activities • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan
CAC/SNA FEEDBACK	SCDOT COMMUNITY MITIGATION MEASURES
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>More access to community center for community children; “neighborhood” center versus “community” center</i> • <i>Center staffed by neighborhood residents with scheduled activities that engage the community</i> • <i>Center staff need to be qualified to run the center</i> • <i>Crime prevention through well-lit streets; going above code for minimum requirements for spacing of streetlights</i> • <i>Sense of ownership through well-defined private/public areas; directional signs, landscaping, and informal common areas</i> 	<ul style="list-style-type: none"> • Recreation Facilities and Amenities • Recreational Programs and Activities • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan • Organizational Training • Community Resource Guide
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Pedestrian bridge to help children and other community center users to avoid traffic</i> • <i>Concerns about walkability for children to the proposed community center</i> 	<ul style="list-style-type: none"> • Connectivity/Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Crime prevention through lighting design and maintenance (CPTED principle)</i> • <i>Surveillance cameras as crime prevention measure</i> • <i>Convey sense of ownership of public spaces as crime deterrent by maintaining areas in public domain (CPTED principle)</i> 	<ul style="list-style-type: none"> • Connectivity/Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan

CAC/SNA FEEDBACK	SCDOT COMMUNITY MITIGATION MEASURES
<p>Social Needs Assessment:</p> <ul style="list-style-type: none"> • Appearance of neighborhood homes (Ranked #9 out of 25) <p>CAC Feedback:</p> <ul style="list-style-type: none"> • Need to eliminate abandoned properties/overgrown lots • Crime prevention through increased law enforcement presence • Community yard sale to foster community cohesion 	<ul style="list-style-type: none"> • Organizational Training <p>SCDOT contributions to address these needs also include development/distribution of a community resource guide, logistical support (meeting coordination, etc.), and Community Office meeting space or CAC/POC and others to organize and advocate to address these needs.</p>
II. COMMUNITY ENHANCEMENT: COMMUNITY CENTER AND RECREATIONAL FACILITY REPLACEMENT	
PROJECT IMPACTS	SCDOT COMMUNITY MITIGATION MEASURES
<ul style="list-style-type: none"> • Displacement of two community centers 	<ul style="list-style-type: none"> • Recreation Facilities, Programs, and Amenities
CAC/SNA FEEDBACK	SCDOT COMMUNITY MITIGATION MEASURES
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • Installation of traffic calming measures • Installation of speed humps to address speeding and general safety 	<ul style="list-style-type: none"> • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • Need for advocacy training to prepare for CAC transition to Project Oversight Committee (POC) • Networking opportunities 	<ul style="list-style-type: none"> • Organizational Training
<p>Social Needs Assessment:</p> <ul style="list-style-type: none"> • Services for seniors (Ranked #5 out of 25) • Services for youth (Ranked #6 out of 25) <p>CAC Feedback:</p> <ul style="list-style-type: none"> • Pedestrian bridge to help children and other community center users to avoid traffic • Concerns about ability of children to walk to community center • CAC agreeable to evaluate one, centrally located facility and smaller pocket parks due to limited availability of large and/or contiguous vacant/underdeveloped parcels • Residents' first choice options (amenities) should be included in the intergovernmental agreement • CAC input in the intergovernmental agreement with the City of North Charleston • "Neighborhood" center vs. community center (no box design) • Facility should be broad scale in design, diverse use, forward-thinking, multi-faceted • Include history in community center 	<ul style="list-style-type: none"> • Recreation Facilities and Amenities • Recreation Programs and Activities • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan • Community History Preservation Study

III. COMMUNITY PRESERVATION: INFRASTRUCTURE NEEDS

PROJECT IMPACTS	SCDOT COMMUNITY MITIGATION MEASURES
<ul style="list-style-type: none"> • <i>Adverse effects on economic vitality due to unjust compensation from original construction of I-26 and I-526</i> • <i>Diminished economic vitality due to depreciated home values, a high number of vacant or underdeveloped parcels, and a high number of homes in disrepair</i> 	<ul style="list-style-type: none"> • Replacement Affordable Housing (rentals and owner-occupied) • Recreation Facilities and Amenities • Recreational Programs and Activities • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan
<ul style="list-style-type: none"> • <i>EJ neighborhood residents are anticipated to experience disproportionate impacts associated with exposure to construction noise and dust as they are likely to have windows open to help ventilate homes</i> • <i>Visual changes to the existing environment in the EJ neighborhoods because the existing road already sits above many of the affected communities.</i> 	<ul style="list-style-type: none"> • Planting Plan for I-526/I-26 corridors within EJ Neighborhoods
CAC/SNA FEEDBACK	SCDOT COMMUNITY MITIGATION MEASURES
<p>Social Needs Assessment:</p> <ul style="list-style-type: none"> • <i>Adequate stormwater management (Ranked #1 out of 25)</i> • <i>Adequate sidewalks/bicycle facilities (Ranked #2 out of 25)</i> • <i>Well-lit streets/sidewalks (Ranked #8 out of 25)</i> <p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Installation of speed humps to address speeding/general safety</i> • <i>Address sidewalk infrastructure needs/neighborhood connectivity</i> • <i>Pedestrian accommodations over/across Rivers Avenue; safety issues for veterans crossing at Patriots Villa across Rivers Avenue</i> • <i>Importance of safe, practical footpaths/sidewalks</i> • <i>Safety for bicycle riders</i> • <i>Address areas with inadequate streetlighting/standing water</i> • <i>CARTA/shuttle bus (with seats) to transport residents, AM/PM</i> • <i>Bus shelters with covers and seating</i> 	<ul style="list-style-type: none"> • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Remove barriers to residents' ability to 'age in place'</i> 	<ul style="list-style-type: none"> • Replacement Affordable Housing (rentals and owner-occupied) • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan • Community Resource Guide
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Potential partnerships with local college nursing programs to develop health and wellness program for senior residents</i> 	<ul style="list-style-type: none"> • Recreation Programs and Activities

IV. COMMUNITY REVITALIZATION: REPLACEMENT HOUSING AND EMPLOYMENT/ECONOMIC OPPORTUNITIES

PROJECT IMPACTS	SCDOT COMMUNITY MITIGATION MEASURES
<ul style="list-style-type: none"> • <i>Displacements associated with original construction of I-26 and I-526</i> • <i>Many of the houses in the affected EJ neighborhoods were built in the 1940's; these homes were prefabricated houses designed to be easily assembled and disassembled so they could be moved as needed; as such, the existing housing stock is old and much is in disrepair</i> • <i>Affordable housing stock is also affected by the reduction of mobile homes in the project area and vicinity; this trend is anticipated to continue based on local growth plans and policies related to mobile homes</i> • <i>Available land for affordable housing is also being reduced by new development in the area including other transportation projects, past airport expansions, and large-scale commercial development</i> • <i>Heirs' Property issues can hinder residents from performing home repairs or building new homes</i> • <i>EJ neighborhood residents experience a high degree of vulnerability related to weather hazards given the quality of housing stock, location within the Filbin Creek drainage basin, and Heirs' Property issues</i> • <i>EJ neighborhood residents experience environmental stressors, notably those related to economic insecurity, outdoor and indoor pollutants</i> 	<ul style="list-style-type: none"> • Replacement Affordable Housing (rentals and owner-occupied) • Recreation Facilities and Amenities • Recreational Programs and Activities • Connectivity and Bicycle & Pedestrian Safety • Community Infrastructure Enhancement Plan • Community Resource Guide
CAC/SNA FEEDBACK	SCDOT COMMUNITY MITIGATION MEASURES
<p>Social Needs Assessment: <i>Availability of quality housing (Ranked #3 out of 25)</i> <i>Availability of affordable housing (Ranked #4 out of 25)</i></p> <p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Prefer single-family rental units as opposed to multi-family units/mobile homes/modular</i> 	<ul style="list-style-type: none"> • Affordable Housing (rentals and owner-occupied) • Financial and First-time Home Buyer Counseling
<p>CAC Feedback:</p> <ul style="list-style-type: none"> • <i>Advocacy and self-advocacy – educational and financial resource</i> 	<ul style="list-style-type: none"> • Organizational Training • College Aid Initiative • School-to-Work Program • Pre-employment Training • Community Resource Guide

2.1 COMMUNITY ADVISORY COUNCIL (CAC)

SCDOT will continue to support the CAC throughout the remainder of the I-526 LCC WEST project development phase and publishing of the FEIS/ROD by facilitating their regularly scheduled monthly meetings and providing logistical and administrative support, as needed. As the project progresses from the development phase to the final design (after approval of the FEIS/ROD), the role of the CAC will transition to a Project Oversight Committee (POC), which will be tasked with overseeing the implementation of the various Environmental

Justice mitigation commitments. Accordingly, SCDOT will continue to support to the POC consistent with the services provided to the CAC. See Section 2.4 for additional details on the role of the POC.

2.2 COMMUNITY PROJECT OFFICE

SCDOT will operate and maintain a Community Office throughout the project development, final design, and Right-of-Way Acquisition phases of the project. The Community Office is staffed with a full-time Office Manager, Community Liaisons/Outreach Specialists, and part-time Right-of-Way Specialists, who are available to provide community residents with real-time project and property acquisition information. The Community Office will also be available to serve as meeting space for the CAC, the POC, and other stakeholders with an interest in the I-526 LCC WEST project.

2.3 COMMUNITY IMPACT MITIGATION PILLARS

As noted in Section 1.3, this EJ Community Mitigation Plan is framed around four pillars of Community Impact Mitigation. Sections 2.3.1 to 2.3.4 summarize the mitigation actions that fall under the four pillars.

2.3.1 Cohesion: Actions that Strengthen Neighborhood Connections

Within a cohesive community, one should find: (1) a common vision and sense of belonging for all residents; (2) a diversity of backgrounds where circumstances are appreciated and positively valued so that everyone benefits from their similar life opportunities; and (3) a network of strong and positive relationships between people with different interests, careers and education within their neighborhood. The following mitigation measure was developed to foster community cohesion.

- **Organizational Training:** SCDOT will provide support for training to transition the Community Advisory Council to a Project Oversight Committee (POC). This training will also be made available to residents of the impacted EJ communities who are interested in joining the POC or other groups looking to initiate community advocacy.
- **Community Resource Guide:** SCDOT will work with the CAC, Community Liaisons, and the City of North Charleston to develop a resource guide for EJ neighborhood residents. The purpose of the Community Resource Guide is to help sustain livability within affected EJ neighborhoods by increasing residents' access to local organizations, resources, and other information on the following topics: food insecurities; health and wellness; home repair; financial assistance; minority-owned businesses; and referral agencies.

2.3.2 Enhancement: Community Center and Recreational Facilities

Community enhancement projects improve the value, quality, desirability, and attractiveness of a neighborhood. For the purposes of this EJ Community Mitigation Plan, this pillar focuses on infrastructure enhancements that will be developed in conjunction with the replacement community centers and recreational facilities.

- **Facilities and Amenities:** SCDOT will fund the construction of replacement recreational facilities and associated infrastructure to mitigate project impacts and satisfy Section 4(f) and Section 6(f) requirements. SCDOT will acquire parcels located within the affected neighborhoods and provide funding to the City of North Charleston who will oversee construction of one large, centrally located community center complex and two pocket parks within the impacted EJ neighborhoods. Final details of the amenities to be included in the community center and the pocket park will be included in the

FEIS/ROD. Construction of the new, centrally-located community center and the pocket parks will be completed prior to the start of construction of the I-526 LCC WEST improvements.

Potential infrastructure related to the replacement recreational facilities could include, but is not limited to:

- Classrooms designed for flexibility, which include moveable panel divider walls allowing room size to be modified to meet program needs,
- Basketball courts,
- A community garden,
- An educational wetland,
- Facility approaches to be well-lit, above minimum requirements for streetlight spacing,
- Covered shelters, grills,
- Walkways, common spaces to be user-friendly and defined by vegetation or other natural definitions; fencing should not be first choice,
- Wayfarer/directional signs to help guide residents to new facilities,
- Facility and pocket park approaches designed with pedestrian facilities, crosswalks, and traffic calming measures such as speed tables or speed bumps,
- Solar panels and emergency generators to enable the centers to be used as shelters during emergencies or inclement weather, and/or,
- Facility to include multiuse path to provide recreational opportunities for walking/biking and connectivity to proposed Filbin Creek Greenway system.

Programs and Activities: Prior to the approval of the FEIS/ROD, SCDOT and the City of North Charleston will develop an intergovernmental agreement outlining the programs, services, structural components, and arrangements for long-term operation and maintenance of the replacement community centers and recreational facilities. The agreement will include language that gives residents of the communities served by the centers priority in areas such as program enrollment/participation, reserving facility space, and volunteer opportunities.

The City of North Charleston will continue to look for qualified candidates to fill Parks and Recreation positions at the community center who live in the impacted Environmental Justice neighborhoods. The City of North Charleston will post job openings for the community center recreation positions within the neighborhoods and encourage the CAC and neighborhood councils to submit qualified applicants.

Final details related to programs, amenities, and community member employment opportunities at the recreational facilities will be included in the FEIS/ROD.

Potential programs and activities could include, but are not be limited to:

- Senior and youth-focused programs and activities,
- A monthly programming/activity calendar that prioritizes programs for community seniors and youth such as meeting spaces, youth lunch programs, and tennis associations,
- A yearly calendar of community center events that focuses on events that foster community cohesion such as those that highlight/preserve local history, involve meeting with government representatives, and cross-cultural activities,
- Programming that provides access to educational and financial resources for community advocacy and self-advocacy,

- Volunteer opportunities with priority on neighborhood residents,
- Inclusion of a community garden at the recreational facility to serve as both an educational program and effort to mitigate neighborhoods' location in known food desert, and/or,
- Maintenance of stormwater detention as an educational wetland to be used for educational purposes during summer programs.

Connectivity and Bike & Pedestrian Safety: SCDOT will develop a plan to improve bike and pedestrian connectivity, safety, and mobility between the replacement community centers and recreation facilities, the surrounding EJ communities, and transit stops along Rivers Avenue.

These potential improvements may include, but are not limited to:

- Implementation of traffic calming measures and crosswalk improvements along SCDOT-maintained streets which provide connectivity between the EJ communities and the community centers,
- The addition of amenities and improvements at the CARTA bus stops along Rivers Avenue from just north of Taylor Street to just south of Rebecca Street,
- Construction of a pedestrian bridge over the Norfolk Southern Railroad tracks connecting West Deacon Street to the proposed Filbin Creek Community Center,
- Development of the first phase of the proposed Filbin Creek Greenway in conjunction with the initiation of planning related to the City of North Charleston's Coast Resilience Grant, and/or,
- Lighting under I-526, the proposed greenway along Filbin Creek, and along primary routes as identified in the first bullet above and developed in coordination with the CAC and the City of North Charleston.

2.3.3 Preservation: Infrastructure Needs

Community preservation connects the past, present, and future of a community by maintaining and preserving neighborhood infrastructure in consideration of past effects of highway/infrastructure projects and current transportation and land use decisions; the ability to prepare for, and recover from, severe weather; and the ability of residents to be able to age in place.

- **Community History Preservation:** SCDOT will fund a study to document the cultural history and character of the impacted EJ communities through the support of a qualified historian and photographer. The study efforts will include collecting oral history, archival research, collection of historic photography, and the development of a report that will be available for viewing online and at the community center.

The scope of the community history documentation is anticipated to consist of:

- Conducting oral history interviews with current and past residents,
- Archival research to collect old aerial photography and other historic photographs to create a visual archive of the communities prior to the construction of I-26, I-526 and other recent developments,
- Collecting photographs and recent images of the communities,
- Development of a report of the communities' history which will be made available for viewing online and at the planned Filbin Creek Community Center, or other venue if preferred by the residents, and,
- Development of history banners and recommendations for visual imagery that can be incorporated into the proposed community centers.

Additional items may be incorporated in the scope as determined by the CAC.

2.3.4 Revitalization: Replacement Housing & Employment/Economic Opportunities

Community revitalization focuses on actions such as maintaining and providing more affordable housing stock, providing employment opportunities for neighborhood residents, and actions such as improved public safety which foster community development.

- **Affordable Housing:** SCDOT is partnering with the South Carolina State Housing and Finance and Development Authority to create 100 affordable, multi-family, rental housing units within the vicinity of the impacted EJ communities. Displaced families that qualify for the affordable units will receive priority placement in new units.

Additionally, SCDOT is conducting early acquisition of vacant lots within and in the vicinity of the impacted EJ communities in order to provide affordable single-family or multi-family owner occupied housing options for families displaced by the I-526 LCC WEST project. These units would be available for both displaced homeowners and those displaced tenants that desire to move into homeownership as a part of the relocation process. SCDOT is investigating provisions and partnerships that will enable the replacement housing to remain affordable in the future.

- **Financial and First-time Home Buyer Counseling:** SCDOT will develop partnerships with local organizations to provide financial literacy and first-time home buyer counseling to displaced residents, which could assist them in securing residential loans and transitioning from renters to homeowners. The counseling will be initiated during first quarter of 2021.
- **College Aid Initiative:** Prior to construction, SCDOT will develop a partnership with educational institutions and provide up to \$50,000 to fund a scholarship program. The scholarship program will be for high school and college students from the impacted EJ communities and neighboring EJ communities that intend to or are currently attend higher educational institutions. EJ neighborhood residents relocated by the proposed project would remain eligible for the scholarship program.
- **School-to-Work Program:** SCDOT will develop partnerships with educational institutions to develop school-to-work employment programs with the goal of enhancing employment opportunities within the fields of construction, engineering, and transportation. During the right-of-way acquisition phase, SCDOT will seek to hire up to ten (10) high school or college students from the impacted neighborhoods and neighboring EJ communities to work as summer interns. EJ neighborhood high school/college students relocated by the proposed project would remain eligible for participation in the School to Work program.
- **Pre-employment Training:** This program will be established prior to construction to provide training and job readiness skills to individuals from the affected communities. SCDOT will determine the number of participants required to complete the program. The program will be the responsibility of the contractor selected to construct the project. The contractor's program plan and curriculum will be reviewed and approved by SCDOT. Graduates of this program will be considered for participation in On-The-Job Training (OJT) Program.

2.4 PROJECT OVERSIGHT COMMITTEE (POC)

As described in Section 2.1, the CAC will transition to a POC after the FEIS/ROD is approved. At that time, the POC will be tasked with overseeing implementation of the EJ Community Mitigation Plan commitments. Prior CAC members or EJ neighborhood residents interested in getting involved with the project will be encouraged to participate on the POC. Members of the POC will be expected to participate in the project organizational training. SCDOT will provide support to the POC, consistent with the services provided to the CAC, as it assumes the following duties:

- Coordinate with technical staff
- Serve as a liaison between the communities and project staff during the final design and construction phases
- Participate in the implementation of the Community Infrastructure Enhancement Plan (see Section 2.5 below)

Once established, it is anticipated that the POC would meet on a quarterly basis.

2.5 COMMUNITY INFRASTRUCTURE ENHANCEMENT PLAN: REVITALIZING THE NEIGHBORHOODS

SCDOT will develop a Community Infrastructure Enhancement Plan (CIEP) that will identify a set of improvements to address bicycle and pedestrian safety, access to community centers, enhanced street aesthetics, project-related stormwater improvements, and traffic calming measures that would be implemented as part of the project. The Community Infrastructure Enhancement Plan will be completed by the approval of the FEIS/ROD.

The CIEP will focus on the following areas:

- Bicycle and Pedestrian Connectivity and Safety Improvements
- Street lighting Improvements
- Traffic Calming Measures
- Project-related Stormwater Improvements
- Aesthetics and Landscaping