



## Appendix X

### Environmental Justice

### Outreach Strategy and Tools





# ENVIRONMENTAL JUSTICE OUTREACH STRATEGY

INTERSTATE 526 (I-526)

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



ORIGINAL STRATEGY DATE: JULY 2019

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*This is a living document that will be reevaluated and updated as needed throughout the project development process.*

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# TABLE OF CONTENTS

|   |           |
|---|-----------|
| <b>1.0 What is Environmental Justice?</b> .....               | <b>1</b>  |
| 1.1 Regulatory Background .....                               | 1         |
| <b>2.0 EJ Analysis Process</b> .....                          | <b>2</b>  |
| 2.1 Project Setting .....                                     | 4         |
| 2.2 Demographics within the Project Corridor .....            | 5         |
| 2.3 Housing and Income.....                                   | 8         |
| 2.4 EJ Neighborhoods Along the I-526 LCC West Corridor .....  | 10        |
| <b>3.0 Environmental Justice Impacts</b> .....                | <b>10</b> |
| 3.1 Cumulative/Recurring EJ Impacts .....                     | 10        |
| 3.2 Direct Impacts to EJ Neighborhoods.....                   | 12        |
| 3.3 Indirect Impacts.....                                     | 13        |
| 3.4 Disproportionate Impacts .....                            | 13        |
| <b>4.0 EJ Outreach Strategies</b> .....                       | <b>14</b> |
| 4.1 Outreach Plan for Environmental Justice Communities ..... | 14        |
| 4.1.1 Community Drop-ins .....                                | 16        |
| 4.1.2 Pop-Up Meetings.....                                    | 20        |
| 4.1.3 Community Advisory Council .....                        | 24        |
| 4.1.4 Community Office/Community Liaison Activities .....     | 27        |
| 4.1.5 Flyer Box Program .....                                 | 33        |
| 4.1.6 EJ Mitigation Outreach .....                            | 34        |
| <b>5.0 Summary</b> .....                                      | <b>37</b> |
| <b>6.0 EJ Team Roles and Responsibilities</b> .....           | <b>38</b> |
| <b>7.0 Document Revision/Update History</b> .....             | <b>40</b> |
| <b>8.0 References</b> .....                                   | <b>42</b> |

# 1.0 WHAT IS ENVIRONMENTAL JUSTICE?

The South Carolina Department of Transportation (SCDOT) is committed to providing a safe and reliable transportation network while balancing the impacts to the natural and human environment. As a part of the environmental project development process, SCDOT will incorporate environmental justice considerations into the evaluation of the project's scope and alternatives. The goal is to actively engage the community in the project planning and decision-making processes in order to prevent any community from bearing a disproportionate burden as a result of the project.

Environmental Justice (EJ) is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.”

**Fair treatment** means that “no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.”

**Meaningful involvement** is created when decision-makers seek out and facilitate the involvement of potentially affected communities so they can participate in the process, help identify community concerns, and influence decisions about activities that may affect their environment and health.<sup>1</sup>

## 1.1 REGULATORY BACKGROUND

Executive Order (EO) 12898, Federal Actions to Address Environmental Justice to Minority and Low-Income Populations, the United States Department of Transportation (USDOT) Order 5610.2C, Final Order to Address Environmental Justice in Minority Populations and Low-Income Populations, and FHWA EJ Order 6640.23A, FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations have been set forth to:

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

*EO 12898 directs federal agencies to **take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low income populations to the greatest extent practicable and permitted by law.***

Title VI of the 1964 Civil Rights Act states, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” The Act bars

<sup>1</sup> USEPA. Learn About Environmental Justice. <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>. Accessed April 19, 2019.

intentional discrimination as well as disparate impact discrimination (i.e., a neutral policy or practice that has a disparate impact on protected groups).

FHWA’s 2011 Guidance on Environmental Justice and NEPA describes the process to address Environmental Justice during the NEPA review, including documentation requirements.

## 2.0 EJ ANALYSIS PROCESS

As a part of the National Environmental Policy Act (NEPA) **compliance**, an Environmental Justice analysis will be performed to **identify EJ populations** and **incorporate strategies** into the project management plan **to engage the EJ community members in the project**.

As a part of this analysis, the **impacts for each project alternative are evaluated** to determine whether the impacts are disproportionately high and adverse for any of the communities located on the project corridor. These studies will also help guide the development of meaningful outreach, provide an understanding of the community’s needs, and support the formulation of potential mitigation strategies for the impacts to the community.

Federal Highway Administration (FHWA) Order 6640.23A defines **disproportionately high and adverse effects** as effects that are “predominately borne by a minority and/or low-income population, or will be suffered by the minority/low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the nonminority/non-low-income population.”

Environmental Justice impacts can be assessed by identifying and understanding the factors described in Table 2.1 below.

Table 2.1: Environmental Justice Evaluation Factors

|                      |   |
|----------------------|---|
| <b>Accessibility</b> | Access to jobs, shopping, transit service; pedestrian access; bicycle access            |
| <b>Mobility</b>      | Traffic congestion, travel times  |
| <b>Safety</b>        | Vehicle crashes, bicycle crashes, pedestrian injuries and fatalities, personal security |
| <b>Displacements</b> | Residences, businesses, public amenities  |
| <b>Equity</b>        | Investments, costs, maintenance   |
| <b>Environmental</b> | Air quality, vibration, noise   |
| <b>Social</b>        | Community cohesion/disruption, isolation  |
| <b>Aesthetics</b>    | Diminution of landscaping, lighting   |

FHWA encourages an EJ strategy centered on the following areas of focus:

- Identifying EJ populations
- Providing opportunities for meaningful public involvement with EJ populations
- Understanding EJ needs and concerns
- Assessing benefits and burdens of proposed plans
- Assessing whether transportation plans may result in disproportionately high and adverse effects on EJ populations
- Deploying strategies to address such effects, including imbalances and needs<sup>2</sup>

The outreach strategy proposed herein identifies opportunities to engage the EJ community members in the project study area. As these efforts and the overall engagement have progressed, a *Community Impact Assessment* (CIA) and an *Indirect and Cumulative Effects* (ICE) Assessment have been prepared for the proposed project.

**These studies have been developed in accordance with NEPA and include detailed demographic information, the input gathered through engagement with residents from EJ neighborhoods and community leaders, a project-specific assessment of impacts, and a detailed *EJ Community Mitigation Plan*. The EJ Community Mitigation Plan has been formulated through a collaborative process with residents of the affected EJ neighborhoods and have incorporated their ideas and input in the decision-making process. As of October 2020, the draft EJ Community Mitigation Plan has been presented to residents in affected EJ neighborhoods to gather feedback on proposed mitigation through a series of drop-in community meetings that were held during the public review period for the DEIS. Feedback received from EJ neighborhood residents will be used to revise 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.**

**Past EJ Community Outreach (as of July 2022):** A round of community meetings was held in June and July of 2016 during the project scoping process to introduce the I-526 LCC WEST project and gather early feedback. Additionally, SCDOT worked with elected officials from the City of North Charleston Council who hosted community meetings that were very well attended. During these sessions, SCDOT presented project information, answered questions, and listened to community concerns.

Community drop-in meetings were held in Fall 2019 preceding the general Public Information Meeting held on November 21, 2019 and Fall 2020 preceding the Public Hearing held from November 12, 2020 to January 15, 2021. The intent of the drop-in meetings was to provide the communities that would be most impacted by the proposed project an opportunity to view the project alternatives and impacts; understand and provide input on the DRAFT EJ Community Mitigation Plan; and interact with the project team in an informal and convenient environment, while adhering to current public health safety guidelines. Additional details and updates on future activities are included in Section 4.0.

As discussed in Section 4.1, the project team will continue to contact local organizations, elected officials, and other groups to inform them of their availability to speak on the project.

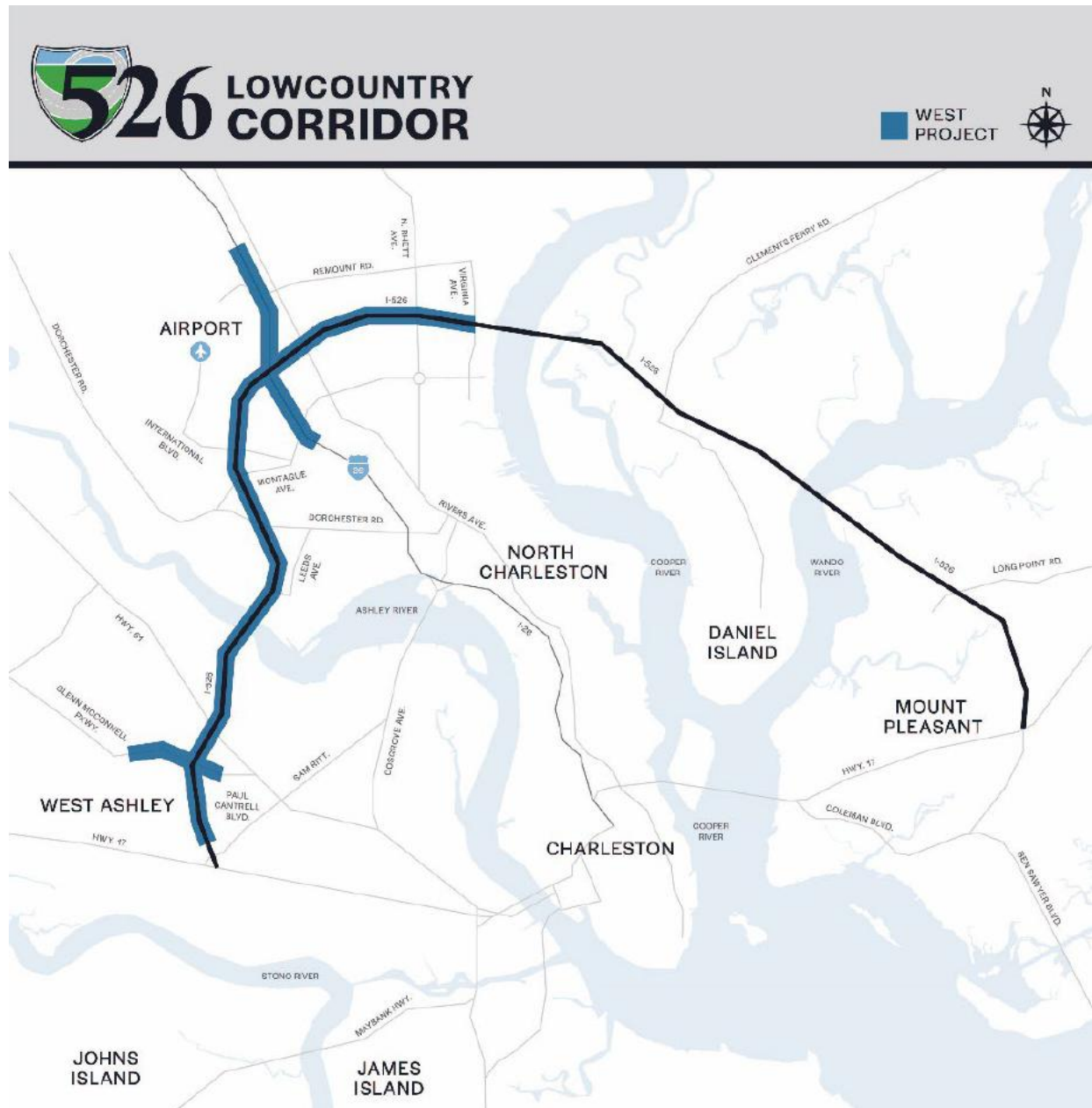
<sup>2</sup> US Department of Transportation, Federal Highway Administration. Environmental Justice Analysis in Transportation Planning and Programming: State of the Practice. February 2019. [https://www.fhwa.dot.gov/environment/environmental\\_justice/publications/tp/fhwahep19022.pdf](https://www.fhwa.dot.gov/environment/environmental_justice/publications/tp/fhwahep19022.pdf)



## 2.1 PROJECT SETTING

SCDOT, in cooperation with FHWA, is evaluating existing and future transportation demands for the I-526 corridor between Paul Cantrell Boulevard and Virginia Avenue as shown in Figure 2.1. The project, referred to as the 526 Lowcountry Corridor WEST (526 LCC WEST) project, is intended to increase capacity and improve operations within the corridor for both local and regional traffic (refer to the 526 LCC WEST Public Involvement Plan (PIP) in DEIS Appendix U for a detailed project description).

Figure 2.1: I-526 LCC WEST Project Corridor





The following sections of this document include an overview of demographics and local trends, which were developed at the initiation of the 526 LCC West project to facilitate the development of the PIP and this EJ Outreach Strategy.

## 2.2 DEMOGRAPHICS WITHIN THE PROJECT CORRIDOR

Population growth in the Charleston region (comprised of Berkeley, Charleston, and Dorchester Counties) is occurring at a rapid rate: three (3) times faster than the national average and two (2) times faster than the state average. Approximately 28 people move into the region every day<sup>3</sup> and growth is projected to continue well into the future. This rapid influx of newcomers is changing the job market, housing stock, and subsequently the demographic composition of Charleston County. From 2000 to 2015, the African-American population decreased by 6% and the White, non-Hispanic population increased by 5%. Other population percentages remained fairly constant over the 15-year period. It is noted that the growth in the White, non-Hispanic population does not reflect national trends.<sup>4</sup>

Regional demographic shifts are reflected in the City of North Charleston, as well. North Charleston's population has grown by almost 40% since 2000, largely in the northwest portion of the city, as evidenced by the construction of golf course communities and other planned developments. In 2000, the City of North Charleston's African-American population comprised 49% of the total population, decreasing to 47% in 2015.

In addition to changes in the region's economy, redevelopment activities have contributed to the demographic shift by reducing the amount of affordable housing in North Charleston. One example is the closure of the Trailwood Mobile Home Park in 2013 which resulted in the displacement of approximately 400 families.<sup>5</sup> The decrease in North Charleston's African-American population during this period was buffered by the influx of downtown Charleston residents who relocated in response to the increased housing prices and the lack of access to public transportation in the downtown area.<sup>6</sup> While the White/non-Hispanic population percentage in North Charleston remained at 45%, the percentage of the population identifying as two (2) or more races increased from 2% in 2000 to 8% in 2015. In 2000, 4% of the total population identified as Hispanic or Latino. This population grew to 10% in 2015.

Figure 2.2 on page 6 identifies neighborhoods within North Charleston that are situated along the 526 LCC WEST project corridor. There is a higher percentage of minority populations near the I-526 and I-26 system-to-system interchange residing in Ferndale (identified as 13 in Figure 2.2) Highland Terrace (18), Liberty Park (22), and Russelldale (38). Moving eastward, several neighborhoods, including Oak Terrace Preserve (29) and Park Circle (33), are gentrifying in conjunction with changes to the housing market like the elimination of older homes and construction of higher-priced new houses. Evidence of this demographic shift is depicted in Figure 2.3 on page 7, where the racial composition of the Park Circle area is now more similar to areas to the south with a higher percentage of White residents.

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<sup>3</sup> Charleston Regional Development Alliance. <https://www.crda.org/local-data/population-demographics/> Site accessed January 22, 2019

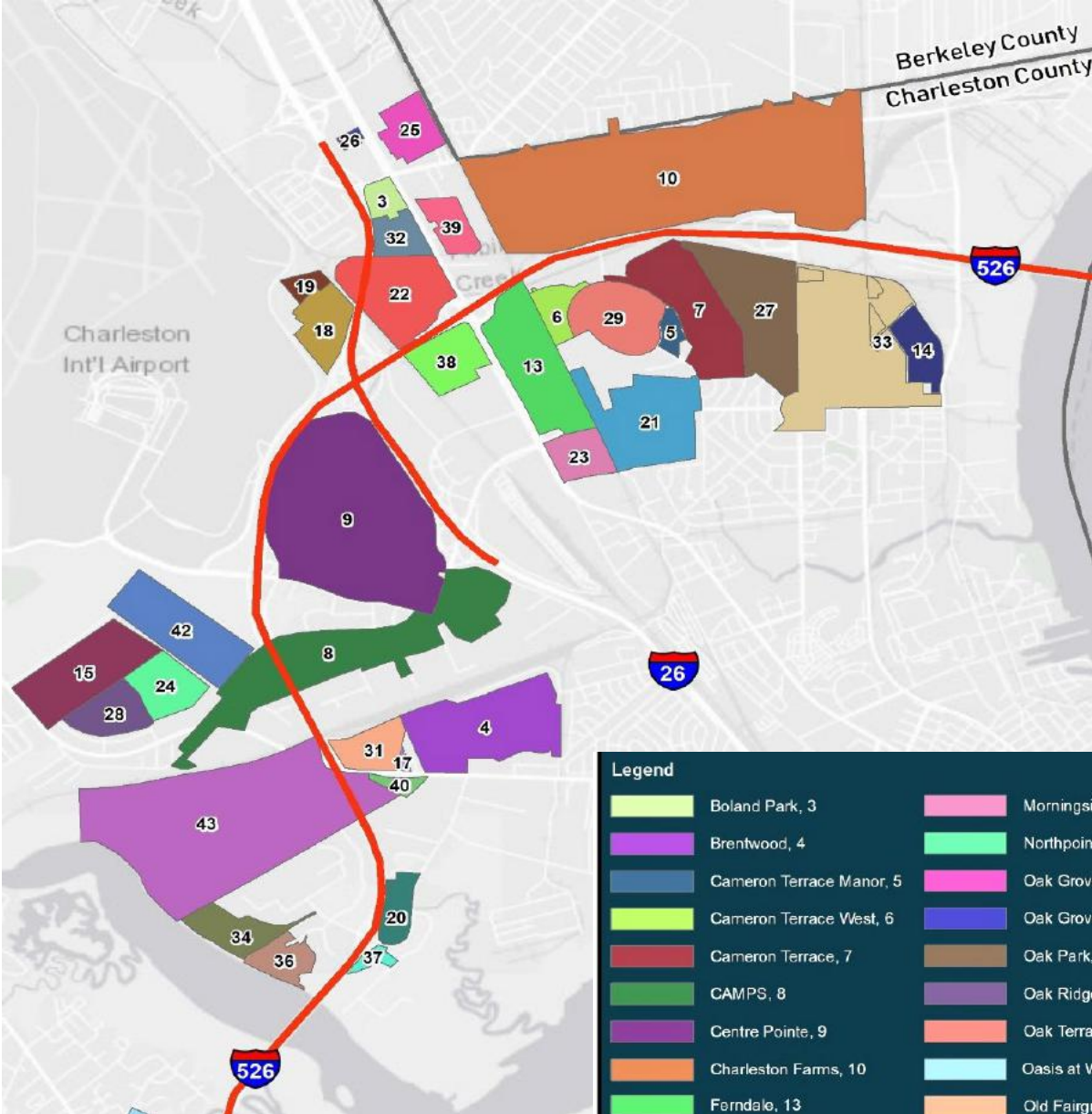
<sup>4</sup> Charleston County Comprehensive Plan. Charleston County Council. Adopted October 9, 2018.

<sup>5</sup> Mobile home park families urged to prepare to move. May 11, 2012. Post and Courier article accessed January 22, 2019.

[https://www.postandcourier.com/archives/mobile-home-park-families-urged-to-prepare-to-move/article\\_99be2fec-6d4e-5579-8467-a4dc5021b74f.html](https://www.postandcourier.com/archives/mobile-home-park-families-urged-to-prepare-to-move/article_99be2fec-6d4e-5579-8467-a4dc5021b74f.html)

<sup>6</sup> The State of Racial Disparities in Charleston County, SC. 2000-2015. College of Charleston Avery Research Center for African American History and Culture. <https://rsji.cofc.edu/wp-content/uploads/2017/01/The-State-of-Racial-Disparities-in-Charleston-County-SC-Rev.-11-14.pdf>

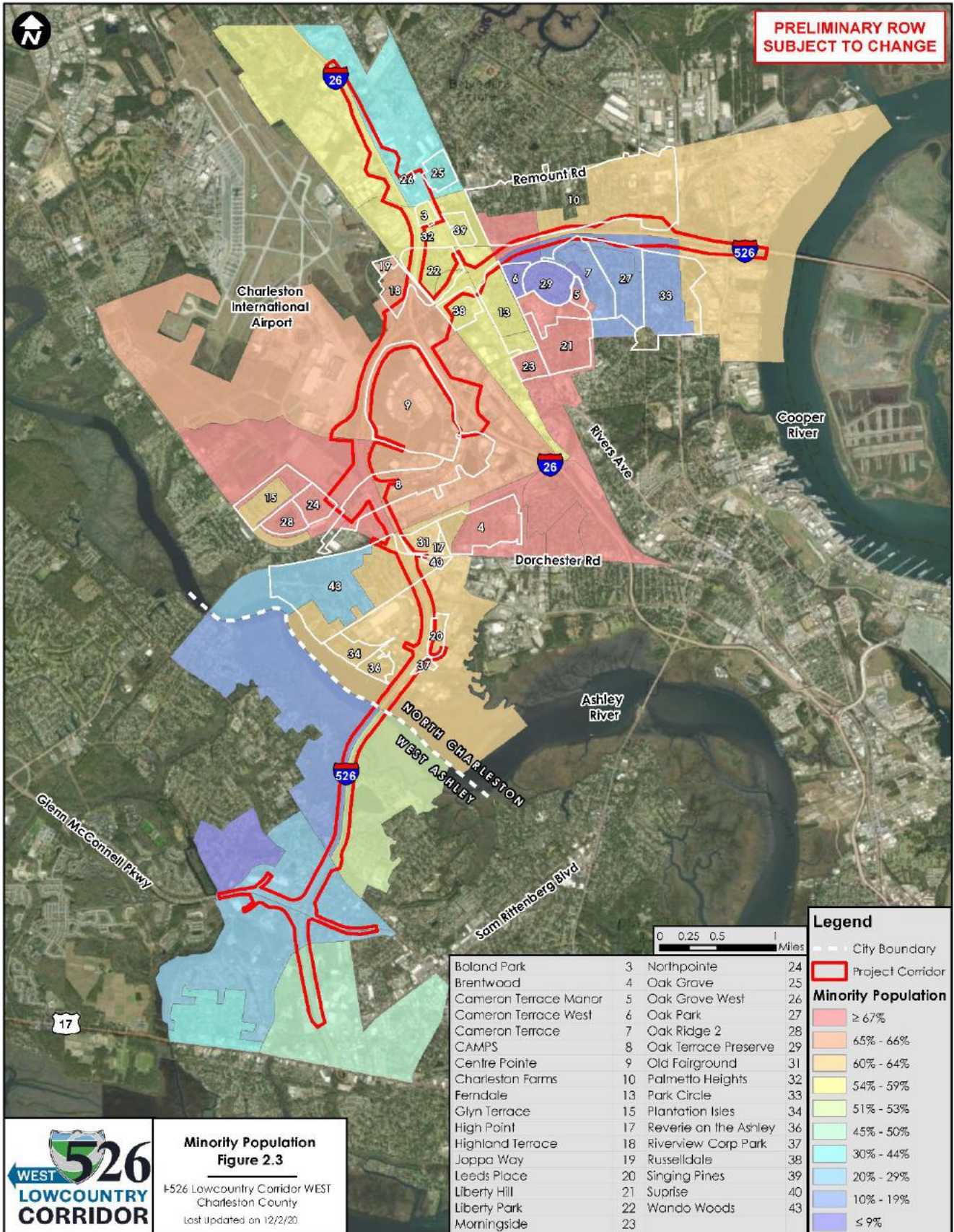
Figure 2.2: North Charleston Neighborhoods



*Environmental Justice neighborhoods in the immediate vicinity of the I-526 LCC West Project include Ferndale (13), Highland Terrace (18), Liberty Park (22), and Russelldale (38).*



Figure 2.3: Minority Populations within the Project Study Area





Moving south along the 526 LCC WEST project corridor, there are locations where residential land use is commingled with non-residential commercial development. Examples are noted along Seiberling Road, Ozark Road, East Ada Street, and West Ada Street, which are small areas of low-income and minority residents (located in the census block group just north of the Ashley River in North Charleston in Figures 2.2 and 2.6). The potential for residential relocations in these areas will be monitored throughout the project development process to ensure that EJ impacts are identified, avoided to the maximum extent practicable, appropriately minimized, and mitigated as necessary.

To the west of the Ashley River along the 526 LCC WEST project corridor is an extension of the City of Charleston referred to as West Ashley. Figure 2.3 on page 8 reveals a much lower percentage of minority residents suggesting the area is comprised of predominantly White residents. Between 2000 and 2015, White/non-Hispanic population percentages remained fairly constant at approximately 70% while the African-American population decreased from 27% to 23% of the total population. The Hispanic or Latino population increased from 2% in 2000 to 3% in 2015.<sup>7</sup>

## 2.3 HOUSING AND INCOME

Figure 2.4 illustrates household income trends in Charleston County between 2000 and 2015. As shown, the number of households with an income greater than \$75,000 has increased by 16% over the past 15 years (from 20% to 36%), while household incomes of less than \$50,000 decreased by 16% (from an overall 62% to 46%).

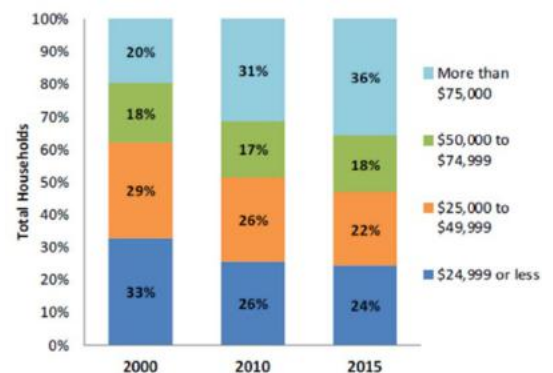
The increases in White/non-Hispanic residents and changes in the job and housing markets are resulting in the gentrification<sup>8</sup> of predominantly minority neighborhoods throughout the North Charleston area. Many neighborhoods in North Charleston are



Figure 2.5: Housing in Oak Terrace  
SOURCE: Google Street View

evidence of gentrification, including Oak Terrace Preserve, a subdivision of the Park Circle community found along the 526 LCC WEST project corridor. Many older homes have been replaced with new, higher-priced houses. Figure 2.5 shows the style of homes originally built in this area (top) and the new homes currently being built as the neighborhood is redeveloped (bottom). This demographic shift is evidenced in Figure 2.6 on page 9, which shows how the racial composition of the Park Circle area is currently more similar to areas to the south with a higher percentage of White residents.

Figure 2.4: Distribution of Household Income in Charleston County



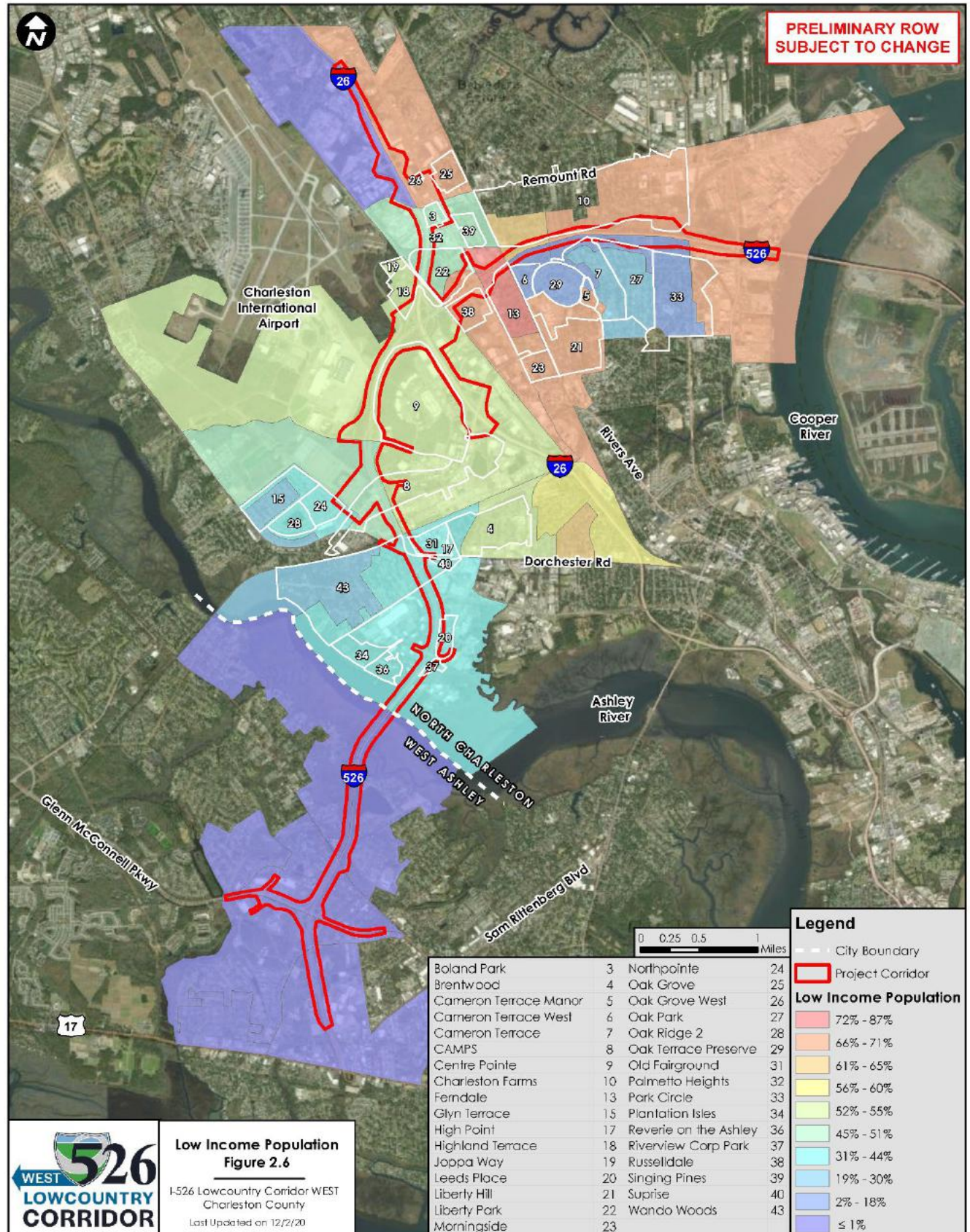
SOURCE: Charleston County, 2018.

<sup>7</sup> Plan West Ashley. City of Charleston, SC. Adopted February 26, 2018. <https://www.planwestashley.com/resources-1/>

<sup>8</sup> "The process of repairing and rebuilding homes and businesses in a deteriorating area (such as an urban neighborhood) accompanied by an influx of middle-class or affluent people and that often results in the displacement of earlier, usually poorer residents"- <https://www.merriam-webster.com/dictionary/gentrification>



Figure 2.6: Low Income Populations within the Project Corridor



## 2.4 EJ NEIGHBORHOODS ALONG THE 526 LCC WEST CORRIDOR

Neighborhoods in the immediate vicinity of the I-526/I-26 interchange are comprised predominantly of low-income and minority residents (refer to Figures 2.3 and 2.6). Communities most likely to experience adverse effects from the proposed project include the Ferndale, Highland Terrace, Liberty Park, and Russelldale neighborhoods. There are also low-income and/or minority populations living in Charleston Farms, Seepoint Townhomes, Camps, and Wando Woods, which may also be affected by the project.

*This EJ outreach strategy focuses on engagement activities that help identify measures to avoid, minimize, and mitigate impacts to the Russelldale, Liberty Park, Highland Terrace, and Ferndale communities. These neighborhoods are most likely to face disproportionately high and adverse impacts from the project.*

## 3.0 ENVIRONMENTAL JUSTICE IMPACTS

### 3.1 CUMULATIVE/RECURRING EJ IMPACTS

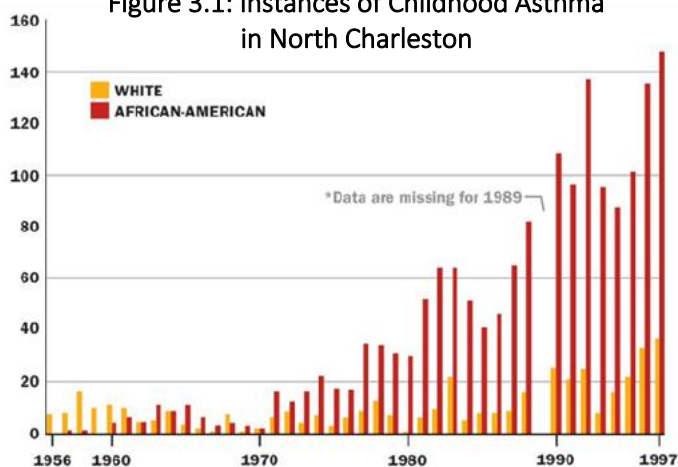
This section describes the typical adverse cumulative/recurring EJ effects that may be broadly experienced by low-income/minority residents in the North Charleston area as a result of the 526 LCC WEST project. As noted in Section 2.2, local data was reviewed at the initiation of the project to facilitate the development of the PIP and the *Environmental Justice Outreach Strategy*. Detailed community studies have been conducted in accordance with NEPA and include detailed demographic information, input gathered through engagement with residents from EJ neighborhoods and community leaders, a project-specific assessment of impacts, and a detailed *EJ Community Mitigation Plan*.

Typical adverse cumulative/recurring EJ effects broadly experienced by low-income/minority residents in the North Charleston area include:

- Intergenerational poverty;
- Segregation and isolation;
- Surface transportation projects;
- Changing job markets;
- Lack of affordable housing;
- Exposure to environmental pollutants;
- Exposure to flooding;
- Limited access to transit;
- Lack of sidewalks and bike facilities; and;
- Language barriers (LEP)<sup>9</sup>

One example of a cumulative/recurring effect is exposure to environmental pollutants. Minority and low-income neighborhoods in North Charleston are

Figure 3.1: Instances of Childhood Asthma in North Charleston



SOURCE: Charleston City Paper. *Is pollution poisoning Charleston's African-American and low-income communities?* Published March 9, 2016.

<sup>9</sup> American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment. Recurring Community Impacts. September 2008. [http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25\(36\)\\_FR.pdf](http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25(36)_FR.pdf)



more exposed to toxins from the area's industrial facilities than the predominantly White/non-Hispanic neighborhoods that are located away from the port and associated facilities. Industrial facilities in the Charleston metro area produce approximately 26% of the state's toxic chemical releases.<sup>10</sup>

Figure 3.1 illustrates how cumulative air quality impacts have disproportionately affected African-American children in North Charleston. A study that researched the number of children treated for asthma at the Medical University of South Carolina (MUSC) over a 40-year period found a 20-fold increase of asthma instances among African-American children; four (4) times the instances of asthma in White children over the same period.<sup>11</sup>

Figure 3.2 shows how social and economic factors can be used to determine the vulnerability of a population to future sea level rise.<sup>12</sup> Social vulnerability is the degree to which a community can prepare for and recover after environmental hazards such as hurricanes, flooding, and sea level rise. The social and economic factors used in the analysis are influenced by the degree to which a community experiences adverse cumulative effects.

Figure 3.2: NOAA Sea Level Rise and Social Vulnerability Index Map



As shown in Figure 3.2, the area within the vicinity of the I-526 and I-26 interchange and the areas southward along I-26 toward Charleston have a **high social vulnerability index**, indicating these communities are more likely to be affected by sea level rise. Conversely, the Oak Terrace Preserve and Park Circle areas, although within close proximity to Filbin Creek, have a lower vulnerability index because they are better able to prepare for and recover from environmental hazards.

Additional cumulative impacts can be reviewed in Appendix F of the FEIS-ROD.

<sup>10</sup> Wilson, Sacoby & Fraser-Rahim, Herb & Williams, Edith & Zhang, Hongmei & Rice, LaShanta & Svendsen, Erik & Abara, Winston. (2012). Assessment of the Distribution of Toxic Release Inventory Facilities in Metropolitan Charleston: An Environmental Justice Case Study. American Journal of Public Health. [https://www.researchgate.net/profile/Erik\\_Svendsen2/publication/230684125\\_Assessment\\_of\\_the\\_Distribution\\_of\\_Toxic\\_Release\\_Inventory\\_Facilities\\_in\\_Metropolitan\\_Charleston\\_An\\_Environmental\\_Justice\\_Case\\_Study/links/09e41512cc50439b30000000/Assessment-of-the-Distribution-of-Toxic-Release-Inventory-Facilities-in-Metropolitan-Charleston-An-Environmental-Justice-Case-Study.pdf?origin=publication\\_detail](https://www.researchgate.net/profile/Erik_Svendsen2/publication/230684125_Assessment_of_the_Distribution_of_Toxic_Release_Inventory_Facilities_in_Metropolitan_Charleston_An_Environmental_Justice_Case_Study/links/09e41512cc50439b30000000/Assessment-of-the-Distribution-of-Toxic-Release-Inventory-Facilities-in-Metropolitan-Charleston-An-Environmental-Justice-Case-Study.pdf?origin=publication_detail)

<sup>11</sup> Waters, D. Charleston City Paper. Is pollution poisoning Charleston's African American and low-income communities? March 2016. <https://www.charlestoncitypaper.com/charleston/is-pollution-poisoning-charlestons-african-american-and-low-income-communities/Content?oid=5790876>

<sup>12</sup> National Oceanic and Atmospheric Administration. Sea Level Rise Viewer v 3.0.0. Social Vulnerability Census Data 2010. <https://coast.noaa.gov/slr/>



## 3.2 DIRECT IMPACTS TO EJ NEIGHBORHOODS

I-526 was originally constructed in the late 1980s and resulted in direct impacts to residential communities in North Charleston. The right-of-way corridor acquired for the highway was very narrow, leaving homes and businesses in close proximity to the final transportation infrastructure. Many of the same communities along the corridor would be directly impacted by any improvements or changes to the interstate corridor.

Figure 3.3 shows a worst-case scenario for relocations within the identified EJ neighborhoods. Updated design concepts for the 526 LCC WEST project are currently in progress and options to avoid and minimize impacts are being explored. While it is anticipated that both the Russelldale and Highland Terrace-Liberty Park Community Centers along with residential structures that parallel I-526 will be displaced, SCDOT and FHWA will rigorously evaluate all options to avoid and minimize impacts to the EJ neighborhoods.

Figure 3.3: Potential relocations in the identified EJ neighborhoods that will likely face the greatest level of community impacts (*shown in orange shading*)



### 3.3 INDIRECT IMPACTS

Indirect community impacts from transportation projects are typically associated with land-use changes that occur as a result of the project. In these cases, the transportation project may provide new access to previously undeveloped land or provide additional capacity resulting in shorter commutes from surrounding areas. In the latter scenario, land use changes would be expected to occur outside the immediate project area in suburban and rural transition areas that are already experiencing growth and new development. This effect has the possibility to occur as a result of the 526 LCC WEST improvements, as surrounding areas benefit from reduced congestion on I-526. However, additional studies have been developed to fully assess the potential for indirect impacts and whether these impacts may affect EJ populations in surrounding areas. ***These impact assessments are part of the Indirect and Cumulative Effects Assessment that was prepared for this project, in accordance with NEPA.*** See DEIS Appendix F for additional information and details on the indirect impacts associated with the proposed project.

### 3.4 DISPROPORTIONATE IMPACTS

“Disproportionate impacts” refer to situations of concern on a project where there exists significantly higher and more adverse health and environmental effects on minority populations, low-income populations or indigenous peoples. As noted in Section 2.2, residential areas within the project area are primarily comprised of minority and low-income populations. As such, the EJ neighborhoods of Ferndale, Highland Terrace, Liberty Park, and Russelldale are most likely to be most affected by the project due to their proximity to the existing interstate corridor. These EJ neighborhoods have been impacted numerous times in the past from interstate construction projects. Currently, there are homes and apartment complexes located in very close proximity to the existing interstate corridor as a result of previous interstate construction. Therefore, anticipated impacts to these communities will be significant with any improvements proposed to the interstate corridor. Without mitigation, the anticipated residential and recreational facility displacements are considered to be disproportionately high and adverse impacts, as there are no comparable burdens placed upon other neighborhoods in the broader vicinity of the proposed project.

As a part of the project development process, the project team will incorporate community outreach efforts, in addition to those outlined in the 526 LCC WEST PIP, in an effort to facilitate meaningful communication with the specific communities that may experience disproportionately high and adverse impacts. The goal of this coordination is to understand the needs and concerns of each community throughout the project development phase and to engage community members in the formulation of an EJ Community Mitigation Plan that meets their needs. The following sections of this document focus on the plan for EJ community engagement and the formulation of a plan to mitigate impacts associated with the 526 LCC WEST project. As noted previously, this is a living document that will be updated periodically throughout the project development process.

## 4.0 EJ OUTREACH STRATEGIES

The overarching goal of the 526 LCC WEST EJ Outreach Strategy is to address direct, indirect, and cumulative (/recurring) impacts on EJ neighborhoods by establishing relationships, building trust, and gathering feedback that will inform decisions on mitigative measures and other aspects of project development. It is understood that the strategies and plans will be refined based on the project team's evaluation of community participation and feedback.

It is important to identify and understand the challenges associated with developing and implementing an effective EJ Community Mitigation Plan. A frequent barrier to overcome is encouraging the community's investment in mitigation development and delivery. Therefore, significant efforts should be made to establish trust and convey ownership to implement measures that address the issues and priorities of directly impacted residents and business owners, and to mitigate project impacts.

It is also important to identify and understand the challenges associated with developing a comprehensive Community Impact Assessment as it will aid development of the EJ Community Mitigation Plan. One notable challenge can be concerns regarding responsibility for identifying and mitigating past impacts. The US Council on Environmental Quality (CEQ) guidelines state, "all relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies ... This will serve to alert agencies or officials who can implement these extra measures and encourage them to do so."<sup>13</sup> In the case of cumulative effects, it may be determined that a potential mitigative action is outside the lead agency's jurisdiction; however, the lead agency can coordinate with the appropriate agency and work together to mitigate the adverse effect. Cumulative effects are not the result of one action by a single agency, nor can they be mitigated by one agency alone. Coordinated efforts between transportation and land use planning is essential.

The project team is also actively coordinating with state and national Environmental Justice experts, including FHWA's resource center staff, Environmental Protection Agency EJ staff, and other agencies that have specialized expertise in EJ community outreach and mitigation. A workshop was held with FHWA's Environmental Justice staff in June 2019 to review this EJ Outreach Strategy and to gather input on the project's potential EJ community impacts. The project team will continue to coordinate with these experts to get input and guidance on the EJ Outreach and Community Mitigation plans that are developed.

### 4.1 OUTREACH PLAN FOR ENVIRONMENTAL JUSTICE COMMUNITIES

As a part of the project's development, a comprehensive Public Involvement Plan (PIP) was developed to outline how the public will be engaged during the project (see DEIS Appendix U). Since EJ neighborhoods were identified along the project corridor and these communities are potentially impacted by the project, this separate and specific **EJ Outreach Strategy** was developed to incorporate efforts designed to engage those residents and business owners. A goal of the EJ Outreach Strategy is to

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<sup>13</sup> CEQ's 40 most asked questions about NEPA. <http://ceq.hss.doe.gov/nepa/regs/40/40p1.htm>



facilitate project involvement opportunities that fit within the EJ community's schedule and overcome traditional barriers to public involvement that many residents may face. Such barriers that can prevent effective public engagement include inadequate access to transportation and childcare services, as well as conflicting work hours when meetings or events are scheduled. To best mitigate some of the barriers to public involvement, outreach activities for the project have been held inside the impacted EJ neighborhoods to give residents a more convenient opportunity to engage with the project team. Creating public involvement opportunities within the impacted neighborhoods has helped the project team spread project awareness, promote utilization of the 526 LCC Community Office, and encourage attendance at the planned informational workshops and other outreach meetings.

*The COVID 19 pandemic was closely monitored by State Government officials. No in person activities or events were scheduled while limitations on public gatherings were in effect. Guidance from the Centers for Disease Control and Prevention and SCDHEC were implemented to ensure the public's safety. The project team is continuously exploring ways to engage residents online, through telephone contact, yard signs, and hard copy materials that are mailed to residents.*

Outreach techniques referred to as "low touch" and "high touch" have been and will continue to be used in the project's outreach efforts. "Low touch" techniques, such as the 526 LCC project website, social media pages, texting, and emails, are methods of contact for the greater project area in Charleston. "High touch" techniques such as face-to-face interaction, door hanger and/or flyer distribution, and telephone calls are generally more effective in EJ neighborhoods.

Public involvement techniques used on the 526 LCC WEST project address three phases of the project development process: project scoping, development of alternatives, and identification of the Recommended Preferred Alternative. In addition, continued outreach and engagement help to inform the development of the EJ Community Mitigation Plan. Although there are key points in the process to provide opportunities for public input, the purpose of this EJ Outreach Strategy and associated activities is to make a focused effort on providing opportunities for more meaningful engagement of EJ neighborhoods. This is important so the team is able to capture the communities' past and present concerns, issues, and needs as they relate to the proposed project and can integrate feedback from EJ neighborhood residents into the project and mitigation development process.

As noted in Section 2.0, a round of community meetings was held during the project scoping process to introduce the project and gather early feedback. Additional community drop-ins were held in Fall 2019, prior to the general Public Information Meeting, and Fall 2020, prior to the Public Hearing, to ensure that EJ neighborhood residents were provided "meaningful opportunities to participate" in the decision-making process. This section includes updates on activities that have been completed as of June 2022 and describes activities planned for the rest of 2022. All EJ outreach is supported by the technical whitepaper appended to this strategy.

EJ outreach efforts include multiple focus areas to effectively engage the community, including, but not limited to:

- 1) Pop-up meetings and/or events in the community at local stores, community centers, or special events

- 2) Organize small group community drop-in meetings in the EJ neighborhoods prior to the general public's Public Information Meetings and the Public Hearing
- 3) Provide consistent information and messaging for all meetings
- 4) Outreach to local churches, organizations, or community groups to assist in getting project information to the community
- 5) Project team coordination with local Hispanic and Latino organizations such as Art Pot to ensure meaningful engagement of the Hispanic population
- 6) Attendance and/or participation at neighborhood association meetings, church meetings, or other local organization meetings to give project updates, listen to community concerns, and answer questions
- 7) Formation of a Community Advisory Council (CAC) made up of community residents to serve as liaisons on the project and attend regular meetings to advise the project team on the outreach activities and assist in formulation of an EJ Community Mitigation Plan for the community's consideration
- 8) Establish an SCDOT project office in the community where residents can come to request project information and/or talk with a community outreach liaison about their questions or concerns
- 9) Form an outreach database of minority and civic influencers in the Lowcountry region to effectively distribute project information (more information on this database can be found in the PIP)
- 10) Other outreach activities and events as suggested by stakeholders, Community Advisory Council members, and other residents

#### 4.1.1 Community Drop-ins

Community drop-ins are held for the potentially impacted EJ neighborhoods and are located, to the extent possible, within the boundaries of those neighborhoods. Special consideration is given to the times and locations of the meetings, so they are more convenient in terms of access and availability. The overarching purpose of these meetings is to encourage discussions with residents, share project information, solicit feedback on potential project designs and the DRAFT EJ Community Mitigation Plan, and provide an opportunity for residents to meet SCDOT personnel and the Community Office staff who can respond to future questions, concerns, or comments regarding the project.

EJ-focused community meetings center on engaging these groups:

- Residents of the Ferndale, Highland Terrace, Liberty Park, and Russelldale neighborhoods
- Small neighborhood businesses, which consist of “mom & pop” stores (owners and employees)
- Faith-based leaders (ministers, church staff, and congregants) and other community leaders

In 2016, the community meetings were arranged to resemble focus group conversations with roundtable discussions. A project survey was conducted digitally (as well as orally) at each discussion table. Discussion notes were compiled and submitted to the project team.

### ***May 2020 Status Update:***

Five (5) community drop-ins were held in November 2019 in the weeks preceding the November 20, 2019 Public Meeting. The purpose of these drop-in meetings was to provide a more intimate setting for those potentially impacted by the project to learn more about those potential impacts, the tools and resources available to them (especially regarding the right-of-way process) and the project schedule. Based on previous outreach efforts, the project team understood there had been a lot of misinformation circulated by other parties. Therefore, it was important to provide a high-touch opportunity to address those concerns and points of discrepancy. The community drop-ins also provided an opportunity for the public to provide comments on the project design and impacts. The 2019 community drop-ins were held at the following locations:

- 1) Biblical House of God
  - November 9, 2019, 2:00 – 5:00pm
  - 2205 Van Buren Avenue, North Charleston, SC 29406
- 2) Ferndale Community Center
  - November 13, 2019, 5:00 – 8:00pm
  - 1995 Bolton Street, North Charleston, SC 29406
- 3) Life Changers Covenant Ministries
  - November 14, 2019, 5:00 – 8:00pm
  - 2140 Eleanor Drive, North Charleston, SC 29406
- 4) Danny Jones Community Center
  - November 18, 2019, 5:00 – 8:00pm
  - 1455 Monitor Street, North Charleston, SC 29405
- 5) Citadel Mall
  - November 19, 2019, 5:00 – 8:00pm
  - 2070 Sam Rittenberg Boulevard, Charleston, SC 29407

The project team presented the same materials at each drop-in, which were identical to the materials presented at the Public Information Meeting. These included: an update on the alternatives development process; project schedule; update on outreach efforts; information on the project development process; mapping that showed anticipated impacts to communities; and information on next steps and how to stay involved in the process. Interactive stations included the virtual public meeting overview video, printed maps showing potential right-of-way impacts, and a property “look up” station, among others.

Meeting locations were chosen specifically because of their convenience and proximity to the EJ neighborhoods and 526 LCC WEST study area. Transit routes were included in the meeting information to facilitate attendance of those relying on public transportation. Although there are no anticipated EJ impacts in the West Ashley area, a community drop-in meeting was also held in this area for the benefit of area residents but to also provide EJ neighborhood residents with an additional opportunity if the other four meeting dates were not compatible with their schedules. A total of 188 people attended the 2019 community drop-ins.

The project team employed several methods to make sure there were multiple communications distributed to EJ neighborhoods advertising the community drop-ins. These included the following methods:

- Mailing a postcard with community drop-in information to EJ neighborhood residents two-weeks prior to the meetings;
- Door-to-door canvassing with flyers;
- Advertising at local small businesses - Meeting flyers placed at over 30 locations in the project vicinity, including transit stops;
- The project's Community Advisory Council (CAC) (discussed further in Section 5.1.3) distributed flyers and participated in word-of-mouth advertising.

### **December 2020 Status Update:**

Three (3) community drop-ins were held in November 2020 on the weekends bookending the Public Hearing that began on November 12, 2020. The purpose of these drop-in meetings was to give the EJ residents an opportunity to identify and understand the direct and indirect impacts from the project, speak to a Right-of-Way (ROW) agent about specific residential relocations, and provide feedback on the DRAFT EJ Community Mitigation Plan. These meetings also gave the CAC members an opportunity to solidify their knowledge of the project mitigation details and engage with their neighbors in a project-specific setting with visual aids and project team support. The 2020 community drop-ins were held at the following locations:

- 1) Biblical House of God | 36 attendees
  - November 6, 2020, 3:00 – 6:00pm
  - 2205 Van Buren Avenue, North Charleston, SC 29406
- 2) Ferndale Community Center | 25 attendees
  - November 7, 2020, 2:00 – 5:00pm
  - 1995 Bolton Street, North Charleston, SC 29406
- 3) Enoch Chapel United Methodist Church | 49 attendees
  - November 14, 2020, 2:00 – 5:00pm
  - 2355 James Bell Drive, North Charleston, SC 29406

Residents were given the same packet of information at each community drop-in meeting. The packet included an updated neighborhood-specific ROW impact map, a digestible copy of the individual proposed mitigation components with visual concept maps, the anticipated mitigation timeline, a project comment sheet, and a survey with a self-addressed envelope and stamp to take home and mail back to the Community Office. Given the amount of detailed information presented to the public during these drop-ins, the project team wanted to give residents time to absorb the information and fully understand each proposed mitigation component to provide specific and constructive feedback. The project team was also available to discuss impacts and mitigation items at large, socially distanced boards with information presented graphically. The boards focused on the following topics: recreation facility replacement, affordable housing, community infrastructure enhancement, community history



preservation, educational/employment opportunities, neighborhood direct impacts, and indirect (or community-wide) impacts.

Meeting locations were chosen specifically based on CAC recommendations and proximity to the EJ neighborhoods and 526 LCC WEST study area. Members of the CAC were adamant that the best way to spread correct project information and receive feedback from the EJ residents on the draft EJ Community Mitigation plan was to host face-to-face meetings with refreshments within the EJ neighborhoods. Because of the meeting locations, many residents were able to walk to the meetings directly from their homes. Due to the on-going 2020 public health concerns, the meetings were held outdoors, under large tents that allowed residents and project team members to discuss the project and mitigation, while adhering to social distancing guidelines set forth by the Center for Disease Control (CDC). In addition, a member of the project team took the temperature of each participant and team member; face masks were required to attend the meeting (paper masks and gloves were provided if needed); and hand sanitizer was readily available at the welcome table.

The project team employed several methods to ensure there were multiple communications distributed to the potentially impacted EJ neighborhoods that advertised the community drop-ins. These included a postcard mailed to 1,201 EJ neighborhood addresses two-weeks prior to the meetings; door-to-door canvassing with flyers; advertising at local small businesses - meeting flyers placed at approximately 20 locations in the project vicinity, including transit stops; and, distribution of flyers and word-of-mouth advertising by the project's CAC (discussed further in Section 4.1.3). In addition, a special focus was placed on advertising to the Hispanic and Latino population by utilizing Art Pot, a local Multicultural Group and Hispanic center, to share meeting information via social media, radio, and door-to-door interaction.

Overall, the 2020 community drop-ins were successful in the quality of conversations and participation from CAC members and residents. Approximately 110 people attended the three (3) drop-in opportunities. Although a larger group of interested residents over the three meetings would have been ideal, project team members were able to talk one-on-one with potentially displaced residents, explain the draft mitigation package to residents, and garner appreciated insight on values, wants and needs of the EJ community residents. An after-action review led the project team to identify areas of improvement for future outdoor community drop-ins including a more focused outreach approach to renters and younger residents, better signage on the outdoor tents to welcome residents from the road, and at least one or two walls for the outdoor tents to prevent wind from disrupting the informational boards that were displayed on easels. These notes, along with other ideas and suggestions, will be considered for any future community drop-in meetings.

#### ***Community Drop-In Activities for 2021:***

The 2019 and 2020 community drop-in meetings were successful in the "high-touch" goal of connecting with EJ neighborhood residents and providing accurate information about the project and draft project mitigation. In addition to gathering feedback on the proposed project, the project team was able to conduct a social needs assessment with EJ residents to help identify residents' needs and priorities separate from the transportation project. Understanding residents' needs and priorities was a vital part of the DRAFT EJ Community Mitigation Plan development as it aims to address many of the identified

issues related to direct and cumulative effects associated with the project. The project team will continue to navigate ongoing health concerns into 2021 to best engage with the potentially impacted EJ neighborhoods. This includes continuing to offer a virtual platform for engagement and planning socially distanced workshops. Additional community drop-ins will be held in the future as determined by the project team.

#### ***Community Drop-In Activities for 2022:***

The project team is planning one (1) Community Drop-In meeting in August 2022 to present the final EJ Community Mitigation Plan to the EJ residents and other interested member of the public. This meeting will also be an opportunity for the project team to provide schedule and project timing updates, increase Community Office visibility, introduce Full-time Right-of-Way Liaisons to the EJ communities, and encourage participation in the Community History Preservation Program.

### 4.1.2 Pop-Up Meetings

To supplement community drop-in's, EJ outreach is also being conducted through "pop-up" meetings at community events. A pop-up meeting is a mobile booth set up in various locations to engage area residents and create opportunities for residents to discuss the project with the project team. Pop-up meetings can be held at any time of the day thereby allowing hosts to plan around other events and activities to increase local participation and overall exposure. Pop-up meetings are also a means of creating and promoting dialogue to determine what residents see as assets, liabilities, and possible solutions to issues within their respective neighborhoods. The project team chose locations that focus on engaging residents of the affected EJ neighborhoods as well as the larger minority community in North Charleston.

#### ***May 2020 Status Update:***

The following pop-up meetings were held in 2019:

- 1) Caribbean Jerk Festival
  - July 20, 2019, 6:00 – 11:00pm
  - 1061 Everglades Avenue
- 2) Harvest Pointe Baptist Church Community Yard Sale
  - August 17, 2019, 7:00am – 12:00pm
  - 4870 Piedmont Avenue
- 3) PPG Paints
  - September 15, 2019, 12:00 – 5:00pm
  - 5280 Rivers Avenue
- 4) North Charleston High School Football Game
  - September 20, 2019, 6:00 – 10:00pm
  - 2731 Gordon Street
- 5) Bethel Pentecostal Holiness Services
  - September 22, 2019, 11:00am – 2:30pm
  - 2331 Elder Avenue

- 6) Biblical House of God
  - September 28, 2019, 11:00am – 2:00pm
  - 2205 Van Buren Avenue
- 7) Russelldale Community Center
  - October 3, 2019, 2:30 – 5:30pm
  - 2248 Russelldale Avenue
- 8) Roper St. Francis Clinic
  - October 12, 2019, 12:00 – 5:00pm
  - 5133 Rivers Avenue
- 9) Highland Terrace Community Center
  - October 24, 2019, 2:30 – 5:30pm
  - 2401 Richardson Drive
- 10) North Charleston Creative Arts Elementary School
  - October 29, 2019, 5:00 – 7:00pm
  - 5200 Lackawanna Boulevard
- 11) Ferndale Community Center
  - October 31, 2019, 2:30 – 5:30pm
  - 1995 Bolton Street
- 12) North Charleston City Hall
  - November 17, 2019, 11:00am – 3:30pm
  - 2500 City Hall Lane

The project team found pop-up meetings to be a cost-effective, convenient, and personalized way to engage EJ neighborhood residents and business owners. Informational flyers, business cards including project contact resources, and recent newsletters were passed out and email sign-up sheets were available for those that wanted to stay informed as project updates became available.

Keeping residents informed and promoting project awareness were the primary goals of the 2019 pop-ups and will continue to be the main objectives into 2020. Additional goals include encouraging participation and attendance at future community meetings and soliciting feedback about the project's impacts to individuals as well as the community.

#### ***December 2020 Status Update:***

Many of the planned pop-up events for 2020 were cancelled or postponed due to the ongoing 2020 public health concerns and the COVID-19 Stay-at-Home Order enacted in March 2020. With this in mind, the project team had to pivot their mindset and focus on developing creative approaches to outreach and utilizing new opportunities that had risen since the onset of health concerns. The project team participated in the following outreach opportunities in 2020:

- 1) *526 LCC WEST Senior Food and Care Package Distribution:* The goal of this outreach was to distribute "Care Packages" with food bundles of fresh vegetables and fruit from Lowcountry Street Grocery to senior citizens and the disabled living in the potentially impacted neighborhoods of Ferndale, Highland Terrace, Liberty Park and Russelldale. Recipients were nominated by CAC members and

Lowcountry Street Grocery to receive packages at their doors on an on-going basis in order for the Community Office staff to build trust and familiarity within the community.

- 2) **Back-to-School Giveaway:** The project team partnered with event sponsors Origin SC, Lowcountry Street Grocery, The A. Phillip Randolph Institute, and the Humanities Foundation to provide 320 bags of back-to-school supplies and 33,000 pounds of food for families and children living in the Ferndale, Highland Terrace, Liberty Park and Russelldale neighborhoods. The event was designed as a drive-thru and walk-by activity so attendees could pick items up while maintaining social distancing requirements mandated by the Governor of South Carolina. Project information was distributed via flyers. 160 total adults and children participated, 29 of which were Latino or Hispanic, a demographic noted in order to ensure meaningful outreach to the Hispanic and Latino population.
  - Ferndale Community Center | 1995 Bolton St., North Charleston, SC 29406
    - September 3, 2020, 1:00pm – 3:00pm
    - 41 adults and 46 children attended
  - Biblical House of God | 2205 Van Buren St., North Charleston, SC 29406
    - September 3, 2020, 4:00pm – 6:00pm
    - 42 adults and 31 children attended
- 3) **Palmetto Community Action Partnership (CAP) Drive-up Event:** The project team worked with Palmetto CAP to distribute project information and educate EJ community members on opportunities for utility bill assistance. Ninety (90) people participated in the event and a 526 LCC WEST Community Liaison was able to connect with 26 people who were interested in further project outreach opportunities.
  - Joshua Baptist Church | 2482 Faber Rd., North Charleston, SC 29406
    - November 20, 2020, 10:00am – 2:00pm
- 4) **Pre-Thanksgiving Food Giveaway:** Thanksgiving meal drive-thru sponsored by Molina Healthcare. 200 people participated in the event and the 526 LCC WEST team was able to connect with 36 people interested in further project outreach opportunities.
  - Harvest Pointe Church | 4870 Piedmont Avenue, North Charleston
    - November 21, 2020, 11:00am – 2:00pm
- 5) **Spanish Worship Service:** Project team members attended and shared project information through a translator at a worship service primarily spoken in Spanish to provide focused outreach to the Hispanic and Latino communities in the potentially impacted EJ neighborhoods. Spanish project information flyers were also passed out to the 52 total congregants (16 of which were children).
  - Enoch Chapel United Methodist Church | 2355 James Bell Drive, N. Charleston
    - November 22, 2020, 12:00pm – 3:00pm
- 6) **Day of Thanks and Giving:** Thanksgiving meal drive-thru sponsored by Healthy Blue (Blue Cross) and project flyer distribution. 200 people participated in the event and a 526 LCC WEST team member was able to connect with 21 people who were interested in further project outreach opportunities.
  - Danny Jones Community Center, 1145 Monitor Street, North Charleston
    - November 23, 2020, 5:00pm – 7:00pm
- 7) **Pandemic-Relief Food Pantry Events:** Drive-thru food giveaway sponsored by Harvest Pointe Church and the Lowcountry Food Bank of Charleston. Project and engagement information postcards were also distributed into the prepared food boxes. One hundred (100) to 150 people participated in each

event and an I-526 LCC WEST team member was able to connect with 58 people on these three (3) dates who were interested in further project outreach opportunities.

- Harvest Pointe Church | 4870 Piedmont Avenue, North Charleston
  - December 3, 10 & 17, 2020, 2:00pm – 4:00pm

8) **SCDHEC COVID-19 Testing and Food Distribution:** COVID-19 testing was provided by staff from the South Carolina Department of Health and Environmental Control (SCDHEC). Food boxes with fresh produce were provided by the A. Philip Randolph Institute in partnership with the Humanities Foundation. Holiday gift bags and other surprise gifts were given to senior citizens and children who live in the four (4) impacted EJ neighborhoods. Project and engagement information postcards were distributed to 100 participants. Thirty (30) residents completed the mitigation survey at the event. Mailing addresses and phone numbers of residents were collected for further outreach in the future.

- Ferndale Community Center (parking lot) | 1995 Bolton Street, North Charleston, SC 29406
  - December 18, 2020, 2:00pm – 5:00pm

### ***Pop-Up Meeting Activities for 2021:***

Because the 2020 health concerns are not fully resolved to the point where large group interaction is permissible, the pop-up activities for the remainder of 2021 will likely remain minimal. By partnering with local organizations and initiatives, the project team will continue to provide outreach in the form of community involvement and residential support.

The project team will continue to evaluate ways to keep offering opportunities for meaningful engagement while public health concerns continue and until regular activity resumes. Activities being explored include telephone town halls, storyboard posters placed throughout the potentially impacted EJ neighborhoods that show project updates and other project information such as proposed site layouts for the replacement community center and recreational facilities; and additional project “drive-thru” meetings where residents would be provided with project information with minimal physical contact with the project team.

### ***Pop-Up Meeting Activities for 2022:***

The goal of pop-up meetings in 2022 is to continue to engage with local residents by providing project mitigation and timing updates as the FEIS-ROD nears completion. The following pop-up events are planned in 2022:

- North Charleston High School Career Fair – May 4, 2022
- Sunday Refresh – 3<sup>rd</sup> Sundays from July to December
  - Various local churches within or near the EJ communities including Bethel Pentecostal Holiness Church, Life Changers Covenant Ministries, Biblical House of God, Enoch Chapel UMC, Pilgrim Baptist Church, and Radiant Church.
  - Representatives of the 526 LCC WEST project will attend worship service and host a post-worship refresh at the end of service with a light snack or cool treat while providing project updates, encouraging visits with the ROW Liaisons & Relocation Specialist, and gathering information from potentially impacted residents.

- 1<sup>st</sup> Friday Pop-ups – Monthly from August to December
  - Highland Terrace-Liberty Park and Ferndale Community Centers
  - The EJ Team and other interested Project Team members will provide project and EJ Community Mitigation Plan updates, encourage visits with the ROW Liaisons & Relocation Specialist, and gathering information from potentially impacted residents.
- City of North Charleston Summer Break Café | June 13<sup>th</sup> to August 5<sup>th</sup>
  - Felix Pickney Community Center
  - Representatives of the 526 LCC WEST project will provide project updates, encourage visits with the ROW Liaisons & Relocation Specialists, and gather information from potentially impacted residents.
- North Charleston Farmers Market – July 28<sup>th</sup> and August 11<sup>th</sup>
  - Representatives of the 526 LCC WEST project will host a popup booth and provide project updates, encourage visits with the ROW Liaisons & Relocation Specialists, and gather information from potentially impacted residents.
- Back to School Event – July or August in conjunction with a sponsoring organization

### 4.1.3 Community Advisory Council

The Community Advisory Council (CAC) was formed to provide input and help guide the 526 LCC WEST project team while navigating the unique challenges, including but not limited to those challenges brought on by conducting effective outreach during current global health concerns. CAC members provide input on actions to minimize and mitigate impacts and guide the project team on how to best engage with the potentially impacted EJ communities. The project team queried community leaders, local schools, neighborhood associations, organizations active in the community, and local churches to assist with identifying community residents that may be interested in becoming involved in the CAC. The goal was to identify multiple (3-5) community members from each of the impacted EJ neighborhoods of Ferndale, Highland Terrace, Liberty Park, Russelldale, or the surrounding areas to serve on the CAC. The CAC is comprised of community members that either live or own property in the EJ neighborhoods or represent the interests of faith-based organizations that are situated within or near Russelldale, Liberty Park, Highland Terrace, and Ferndale. The purpose of the CAC is to help advise the project team on the communities’ needs, understand the full extent of the potential project impacts on the community and provide input on the most effective ways for the project team to be accessible to the community and solicit their input. SCDOT and the CAC collaborated to refine and finalize the EJ Community Mitigation Plan which is included as Appendix H in the FEIS-ROD.

It is the project team’s understanding that multiple members of the CAC will also participate in the Project Oversight Committee (POC) during the implementation phase of the EJ Community Mitigation Plan to ensure that the commitments outlined are implemented in accordance with the intent of the plan. The project team will provide skills training to help give the CAC the resources necessary to organize effectively.

## ***May 2020 Update***

The CAC is comprised of 20 members who were invited based on their background and relationship to the community. The project team contacted local churches, schools, and other entities to help identify residents of the impacted EJ neighborhoods that may be interested in participating in the CAC.

The CAC's membership is diverse and includes homeowners, tenants, business owners, property owners, and religious leaders across the demographic spectrum to fully represent the community's history and future goals.

The CAC has convened eight (8) times since September 2019 and will continue to meet throughout the course of the project. The initial meetings focused on member responsibilities, project specifics, and community issues. CAC members are always encouraged to express opinions and ask both focused and broad-ranging questions as they become more informed and empowered. As project development moves forward in 2020, the CAC's discussions are focusing on development of the EJ Community Mitigation Plan, including plans for a replacement community center and recreational facilities. The CAC will continue to play an advisory role in the mitigation development process and transition to the POC.

The CAC has also been helpful in disseminating project information, including flyers on the 2019 community drop-in's and Public Meeting as well as the Informational Workshops planned for spring/summer 2020 prior to the COVID-19 stay-at-home order. Members of the CAC are still actively engaging other neighborhood residents via telephone through the duration of the COVID-19 stay-at-home order.

Another potential opportunity for the CAC is the development of op-eds in local papers that articulate the CAC's perspective on the project including outreach and development of the EJ Community Mitigation Plan. CAC members may also have the opportunity to join SCDOT for television or radio interviews.

## ***December 2020 Update***

There are 18 CAC members that continue to regularly attend and participate in CAC meetings. Since September 2019, the CAC has convened 14 times and will continue to meet until the POC is formed, prior to the implementation of many of the proposed mitigation items in October 2021. Since the May 2020 update, the primary focus of the CAC meetings has been the development of the DRAFT EJ Community Mitigation Plan. This has included advising the project team on community priorities regarding the replacement recreation facilities, recreation programs, affordable housing, neighborhood advocacy and resource accessibility, educational/employment opportunities, community history preservation, and bicycle/pedestrian safety. In addition, the CAC has hosted a community leader panel with an emphasis on community advocacy, met with the City of North Charleston to speak on behalf of their neighborhoods and, along with members of the project team, participated in community drop-in meetings. Their role was to explain the details of project impacts and proposed mitigation plans to their neighbors and other residents living in the EJ neighborhoods.

The CAC has also been instrumental in helping the project team to disseminate project and community meeting information to neighborhood residents. CAC members accompanied the community liaisons to



help distribute community drop-in flyers/surveys while engaging with their neighbors about the project. They also helped to select the best (or most frequented) locations within the EJ neighborhoods to place project awareness signs/balloons; volunteered to display project signs in their own front yards; and provided friendly, familiar faces with whom the EJ residents could comfortably interact. Members of the CAC also volunteered their time to provide the CAC perspective on the project website in the form of short, professionally filmed videos, and newspaper articles in the *Post and Courier* and *The Chronicle*. The goal of the CAC videos is to give residents a better idea of the CAC members' perspectives and identify who is representing them during the project process.

Due to the COVID-19 Stay-at-Home Order, the CAC did not have an option to meet in person from March 17, 2020 to August 29, 2020. Instead, meetings were held virtually using computer software that allowed for dialog, screen sharing, and group polling. Although this method did prove to work as a basic meeting platform, the project team found that CAC members were more engaged and participated with greater enthusiasm when unimpeded by technology barriers and able to meet in person. Because of this, starting at the August 29, 2020 meeting, the project team began offering limited seating at the Community Office for CAC members who wished to attend CAC meetings in person. The limited seating rule complied with all South Carolina public health recommendations and regulations at the time. The in-person/virtual hybrid approach served CAC members and project team members who were more comfortable on a virtual platform and those who preferred to meet in-person. Safety precautions were implemented at the in-person CAC meetings including 6-foot social distancing, mask requirements, and readily available hand sanitizer and gloves for protection.

#### **April 2021 Update**

There are 10 active CAC members that continue to regularly attend and participate in CAC meetings. Since September 2019, the CAC has convened 17 times and will continue to meet until the dissolution of the CAC organization once the FEIS/ROD is signed and the EJ Community Mitigation Plan is finalized in October 2021.

To encourage resident participation in the public feedback process, the project team sent out holiday greeting cards in January 2021 with a reminder to submit comments regarding the project and mitigation efforts on the project website. By working with the CAC to design and distribute these cards, the project team's goal was to utilize resident familiarity with the CAC to increase engagement. It is the project team's intention to keep the CAC involved in outreach opportunities until their transition a community advocacy group in order to continue to build trust and familiarity with residents in the EJ neighborhoods.

The CAC is currently making preparations to organize as a community advocacy group in order to continue to meet outside of the 526 LCC WEST project after October 2021. Since the December 2020 update, the primary focus of the CAC meetings has been to review public comments and survey results regarding the EJ Community Mitigation Plan, receive an update on revisions to the EJ Community Mitigation Plan based on CAC feedback and public input, review the Community Infrastructure Enhancement Plan Open House materials, provide feedback on mitigation items such as the location of the pedestrian bridge. The CAC has also been and continues to be an important catalyst for

disseminating project meeting information and encouraging neighbors to participate in the mitigation surveys and open house meetings.

#### **July 2022 Update**

The CAC was formed to provide input and help guide the 526 LCC WEST project team by providing input on actions to minimize and mitigate impacts and offer guidance on how to best engage with the potentially impacted EJ communities. As the outreach efforts were evaluated, the CAC played an essential role in determining which events will best serve their neighbors. Prior to late Spring of 2022, the last monthly CAC meeting was held on Saturday, October 9, 2021. Meetings have resumed and are scheduled from 10:00am to 12:00pm on the first Saturdays beginning May 2022. As of July 2022, there have been 21 CAC meetings. The CAC will begin to transition to the Project Oversight Committee through the end of the year.

#### **4.1.4 Community Office/Community Liaison Activities**

Establishing connections within the community and with resources that can best serve the community's needs are not only critical components of an effective EJ Outreach Strategy but support the delivery of a comprehensive EJ Community Mitigation Plan. To foster the growth of these relationships, SCDOT opened a Community Office in Gas Lite Square, a shopping complex just north of the Liberty Park neighborhood.

In addition to staffing the office, the office manager and community liaisons advise the project team on strategic engagement practices, opportunities, and messaging tailored to reach the specific impacted EJ neighborhoods. The Community Office staff's network of local resources is proving to be a key component in cultivating relationships to help the project team explore and develop mitigation measures that are grounded in recommendations provided by the CAC.

The Community Office is where area residents can gather up-to-date information on the proposed project. The Community office is also a location where area residents were able to review the Draft EJ Community Mitigation Plan and DEIS on their own schedule and talk with project team members as a supplement to all community meetings and outreach opportunities. Visitors can drop in or schedule an appointment to review maps, displays and other materials while sharing feedback with the office staff and others from the project team.

#### **May 2020 Status Update:**

The office is staffed during regular weekday business hours and by appointment as needed to accommodate individual schedules. One office manager and a staff of community liaisons, serve as a conduit for accurate information sharing by: engaging with visitors, guiding them through displays of the proposed improvement alternatives, documenting their concerns, offering appropriate guidance through project team resources, and assuring them their voice and involvement is integral to the success of the project development process. Right-of-way liaisons are also available to answer project-related questions. Prior to public health concerns that implemented the COVID Stay-at-Home Order in March 2020, the Community Office served as the regular meeting place for the CAC.

SCDOT hosted an Open House for the Community Office on January 25, 2020 between 1:00pm and 4:00pm. The purpose of this Community Office Open House was to: generate awareness about the Community Office and the valuable resources available there; build trust in the community by providing repeated exposure to consistent Community Office staffing; integrate into the project area community to become the trusted resource for accurate project information; share project information with the community; and gather feedback on upcoming Community Office Workshops.

The EJ communities and general public were encouraged to attend the event and enjoy food samples from neighboring vendors while touring the office, meeting the community liaisons, receiving feedback from the project team, confirming individual impacts, making appointments with right-of-way liaisons, and providing comments. Ultimately, 58 guests were welcomed, nine (9) appointments were scheduled with right-of-way liaisons, 10 properties were reviewed by GIS, and seven (7) comments were submitted.



Figure 4.1: Front of the Community Office during the SCDOT Open House event on January 25, 2020

### **December 2020 Update**

Due to the COVID-19 Stay-at-Home Order, the Community Office was closed to walk-in visitors from March 17, 2020 to October 5, 2020. During this time, residents could call, text, or email the project team with any questions or concerns regarding the project. Residents were also permitted to make an appointment to talk to a community liaison in person. Appointments allowed the Community Office staff to safely schedule meetings by sanitizing surfaces between visits and maintaining social distancing by allowing a maximum number of 6 people in the Community Office at one time. Because of the near eight-month closure, the Community Office did not host educational events or regular CAC meetings after March 2020 as originally intended. Walk-in visitors were permitted to meet with the Community Office staff without an appointment starting October 5, 2020. The project team will continue to monitor the status of the public health concerns to determine the safest course of action for Community Office staff and visitors in 2021. A summary of the number of residents or stakeholders who contacted the Community Office is detailed in the graph below. As noted by the red box on Figure 4.2, there was a noticeable decrease in community engagement once the Community Office closed as a result of the COVID-19 Stay-at-Home Order in March 2020. Once the office opened back up in October, the Community Office has seen an uptick in appointments, walk-ins, and calls to the office.

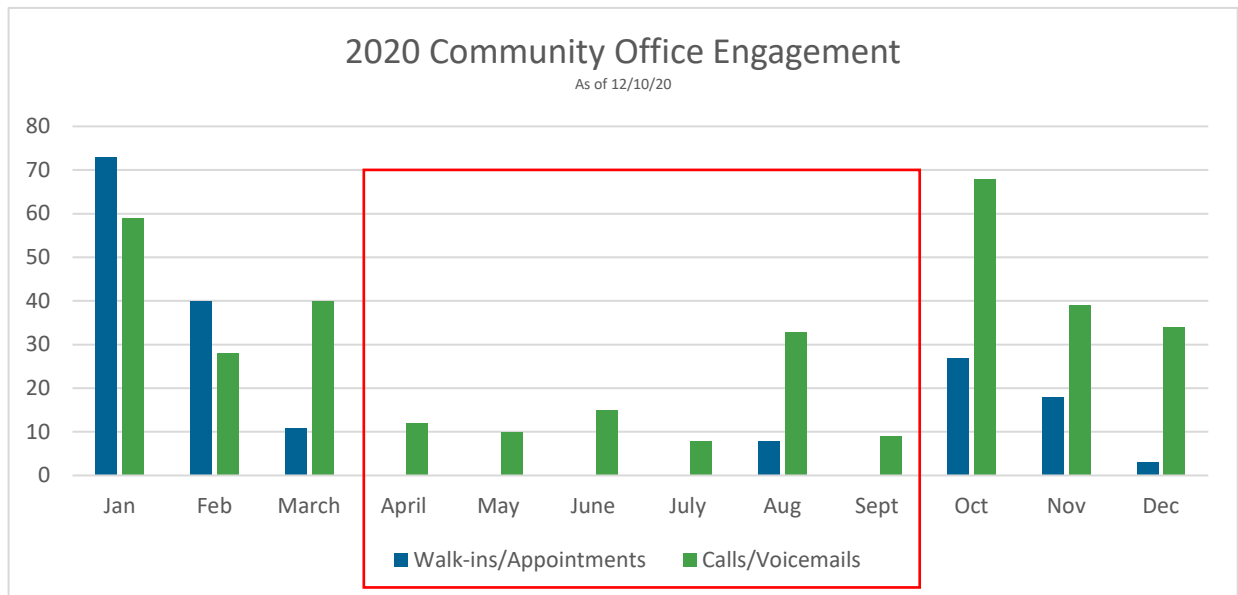


Figure 4.2: Graph showing the level and type of engagement the Community Office had with residents of the community for 2020. Office closure due to public health concerns is signified by the red box (April – September 2020). December numbers are as of 12/14/20.

The 526 LCC WEST Public Hearing included an option for in-person appointments available at the project office. The Community Office hosted the in-person appointments with varying time slots for the Public Hearing on November 19 and December 5, 8, and 9. 13 in-person appointments were made at the Community Office. In addition, a Public Hearing Live Comment Session occurred on December 15, 2020. This session gave the public the opportunity to make a verbal comment in lieu of a written comment. Fifteen (15) people signed up for the comment session, two (2) comments were received, and approximately 40 people participated by calling-in to listen to the verbal comments.

The community liaisons worked throughout 2020 to increase awareness of the project and provide high-touch engagement techniques to the EJ residents. The liaisons utilized local media, including African American and Hispanic radio, newspaper, and television programs, to make special announcements related to the proposed project such as Public Hearing dates, Community Drop-In dates and other ways to engage and advocate for their community. The community liaisons also collaborated with the Charleston County School District and Palmetto Community Action Partnership (CAP) as a way to distribute project information, inform residents about resources available to them, and otherwise engage residents in affected EJ neighborhoods. It was the project team's goal to provide a quick guide for EJ residents so they would have an idea of the readily available resources and contacts in their local area. The community liaisons developed a magnet with emergency phone numbers and other community contacts and sent one to each residence in the EJ neighborhoods. Partnerships with local organizations such as Origin SC and Lowcountry Street Grocery also allowed the community liaisons to provide outreach to EJ residents during on-going public health concerns that prevented other such high-touch engagement techniques. Outreach activities included participation in food drives, back to school giveaways, and other educational events. The community liaisons continue to staff the office, answer questions from community residents, and communicate with individual CAC members regularly.

### ***April 2021 Update***

The Community Office has experienced an uptick in visitors since the December 2020 update due to the consistent presence of a right-of-way liaison in the office on a weekly basis and the decrease in state regulated restrictions during the public health crisis. Right-of-way appointments have helped spread correct project information and have been successful in bringing more residents to the Community Office.

Up until this point, the community liaisons have primarily been working on a virtual basis in order to continue outreach during the public health crisis. Since vaccines have become more regularly distributed, Community Office staff have been vaccinated to help protect them from the health side-effects of the COVID-19 virus. The assurance of a vaccine, in addition to the relaxed restrictions on face-to-face public engagement have enabled the community liaisons to begin a door-to-door canvassing effort to reach every impacted home in the EJ neighborhoods. The goal of this effort is to encourage visitors at the Community Office, promote the Community History Preservation Program, and begin advertising for the professional and personal development training programs that will be offered later this year. Materials to be distributed to residents include the Community Office flyer in English and Spanish and business cards with project team member contact information. While canvassing, the community liaisons wear protective facial masks and disposable gloves, regularly apply hand sanitizer, and are equipped with extra personal protective supplies should any resident require a protective mask.

### ***Community Office Activities for 2021:***

One objective for the Community Office is to be a location where educational events can be hosted, and outreach literature can be distributed. Informational workshops under consideration include navigating heirs' property challenges; understanding citizens' rights during the right-of-way acquisition process; preparing for employment and the workplace; a tax assistance workshop; financial literacy; first-time homebuyer; and general advocacy training. The Community Office also provides a space where EJ neighborhood residents can meet the project team to share concerns and ask questions.

The Community Office will continue to serve as a location where area residents can gather up-to-date information on the proposed project. The Community Office will also be used as a location where area residents can review the EJ Community Mitigation Plan and Final Environmental Impact Statement/Record of Decision. In addition, residents will continue to be able to utilize the Community Office to meet with right-of-way liaisons to discuss impacts to their properties and options for relocation.

### ***Community Liaison Activities for 2021:***

The community liaisons will continue to communicate with members of the CAC. Meeting with CAC members at the Community Office or talking with them by phone is critical to the success of the project. Continuous dialogue with the CAC allows the community liaisons to share resources for individuals in the EJ neighborhoods. It also provides an opportunity to find out what many families may need without "formal" neighborhood organizations. In 2021, the community liaisons will provide advocacy training to neighborhoods residents who may need help getting organized.

The community liaisons will continue to canvass the EJ neighborhoods to bring project information to the impacted residents and inform them of upcoming events or opportunities.

The project team will continue to collaborate with the CAC and Community Office staff to explore opportunities that will maximize the usefulness of the Community Office and add value to the quality of life for residents of their neighborhoods.

Community liaisons are continuing to explore engagement opportunities for 2021, including, but not limited to, the following:

- Opportunities to invite elected representatives and local government officials to participate in quarterly meetings held at the Community Office.
- Opportunities for ongoing coordination with the Interdenominational Ministerial Alliance, a group of approximately 30 ministers that meet regularly. This coordination would help the project team communicate with EJ neighborhood residents through local religious leaders.
- Develop techniques to directly engage with renters and younger residents in EJ neighborhoods.
- Encourage community ownership or sense of neighborhood pride among individual residents.
- Involve the CAC on future outreach opportunities.
- Continue the on-going dialogue with CAC members and incorporate their ideas in outreach efforts.
- Use input from CAC members to identify new locations for the real estate and acrylic boxes.
- Add unique features to the real estate and acrylic boxes like a seasonal label (decal or ribbon; holiday touches, etc.) or a neon-colored sticker on the front of the boxes that reads: Will you have to move?
- Partner with entities like the Interdenominational Ministerial Alliance and provide them with the tools to share project updates with others (i.e., embedded messages or eblasts).
- Continue to communicate with persons who attended previous pop-up or drop-in meetings. The community liaisons could make calls to them from the office.
- Maintain contact with persons on the "influencers" list and provide them with the necessary tools to share with others (i.e., embedded messages or eblasts).
- Keep elected officials (i.e., Mayor Keith Summey, Councilman Sam Hart, Councilwoman Dorothy Williams, etc.) engaged.
- Encourage officials to engage in conversations or host meetings with residents to get their input.
- Continue to expand community partnerships. Engage partners like the City of North Charleston, the Charleston County School District, Charleston Water System, Trident United Way, and others to build the number of people who know about the project. Provide these entities with the necessary tools to share with others (embedded messages, eblasts, printed materials, etc.).
- Call or send text messages to residents who will be impacted by the project. Encourage residents to meet with the project team (or Right-of-Way Liaisons if needed).
- Continue to send PSAs and articles to minority media contacts in the trident region. Invite the minority media contacts to attend special events when engaging with the residents.
- Engage young people when canvassing in the EJ neighborhoods. Partner with organizations like Palmetto CAP or area churches when planning canvassing efforts.



- Provide opportunities for youth to "job shadow" project team members.
- Add more visual reminders about the project in the EJ neighborhoods with yard signs, story boards, etc. Balloons could be added to announce special meetings and new deadlines for engagement. "Before" and "after" pictures should be shown so residents can see the changes that will take place in their neighborhoods.
- Use door hangers when sharing information with EJ residents about upcoming meetings or project updates.
- Use social media (through churches or other entities) to get project update messages to the EJ residents.
- Continue to share information with representatives from the Hispanic/Latino communities to "get the word" out in the EJ neighborhoods. Utilize members of the minority media contact list like Lydia Cotton and Rosa Marcela Valer.
- Provide advocacy training in small groups at the Community Office for residents in the four (4) EJ neighborhoods that do not have organized neighborhood associations.
- Provide unique ways to promote first-time home buyer, financial literacy, and heirs' property, etc. programs when offered at the Community Office or other locations. In addition to door hangers, yard signs and radio/TV PSAs, partnering with media contacts may also be utilized to promote these programs.
- Continue to coordinate with the Charleston County School District (CCSD). Through the CCSD's Division of Strategy and Communications the project team will share information to families with students living in the EJ neighborhoods about upcoming events by distributing flyers, placing yard sign advertisements in the carpool line, and utilizing their phone messaging system to share a public service announcement.

### **July 2022 Update**

The 526 Community Office continues to serve as a resource for accurate project information and as a meeting space for community residents. With the implementation of the EJ Community Mitigation Plan, a full-time Right-of-Way Specialist will be available at the Community Office to answer questions regarding residential or commercial relocations before and during the Right-of-Way phases. In addition, the Community Liaisons will resume hosting workshops and information sessions in the Community Office, with virtual options to participate. All workshops will begin with a brief description of the project's status. A small packet of the various brochures available in the Community Office will also be available for distribution.

Immediately following the CAC Meetings scheduled for August, September, and October, a two-hour Community Office Open House will be hosted so that attendees are able to interact with the 526 LCC WEST Project Team and neighborhood representatives. Along with project materials and take-away literature, information about the resources available at the Community Office and through its staff will be shared. The EJ Team will seek feedback on the EJ Community Mitigation Plan and encourage appointments with the ROW Liaisons.



### 4.1.5 Flyer Box Program

The 526 LCC WEST flyer box program began in mid-2019. The intent of this program is to keep citizens in and around the affected areas up to date on project information without relying on the use of technology, making it more accessible for those with limited computer/internet resources. Indoor and outdoor locations were identified throughout the EJ communities at transit stops, local businesses, churches, community centers, and city offices. Additional locations outside of the EJ communities, such as senior centers, transit hubs, or meals on wheels routes, were also incorporated to expand reach.

#### **May 2020 Update:**

At initial deployment, 23 indoor locations and 10 outdoor locations were established. Standard clear plastic brochure stands were placed in high traffic/high visibility areas of each indoor location. At each outdoor location, a realtor box stand was installed within the designated right-of-way.

From initial deployment to mid-March 2020, locations were checked weekly to determine the number of flyers taken and to replenish the supply. Information included in the boxes has ranged from project newsletters to FAQ to an outline of upcoming project-related events. Locations lacking reasonable distribution figures have been pulled over time, with new locations being installed as approvals permit. Larger transit hubs (outdoor locations) have seen the highest distribution figures. Smaller businesses such as Personal Cash Loans and NAI Coin Laundry (indoor locations) saw the lowest distribution and were thus pulled.

Problems related to the flyer box program have included litter and theft/vandalism of brochure boxes and realtor box stands. Litter has been handled expeditiously, with any 526 LCC WEST collateral being gathered and placed back in its appropriate place or properly disposed of. Broken brochure boxes and realtor box stands were repaired if possible and replaced when beyond repair. Relocated/stolen boxes and box stands were replaced when recovery was not possible.

#### **December 2020 Update:**

Due to the public health concerns that caused the SC Governor to initiate the COVID Stay-at-Home Order in March 2020, the flyer box program was paused. All flyer boxes and indoor acrylic stands were removed from each location to decrease the chance of indirect contact between members of the public. By September 2020, the Center for Disease Control (CDC) determined that COVID-19 was a respiratory disease that spread primarily through respiratory droplets and close contact with those who are sick. Spread from touching surfaces is not thought to be a common way that COVID-19 spreads.<sup>14</sup> With the CDC information and data available in September 2020, the project team determined the flyer box program should be reenacted in order to get time sensitive project information out to the EJ residents who may not have access to the internet or a computer. At initial re-deployment on September 21, 2020, 10 indoor locations and nine (9) outdoor locations were established. Standard clear plastic brochure stands were placed in high traffic/high visibility areas of each indoor location. At each outdoor location, a realtor box stand was installed within the designated right-of-way. In addition, three (3)

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<sup>14</sup>Center for Disease Control and Prevention (CDC). How COVID-19 Spreads. October 28, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html>.

apartment complexes near the 526 LCC WEST corridor were emailed the flyers for distribution among residents.

Each location is checked on a weekly basis and on average from September to November 2020, approximately 70 flyers were picked up by residents or other interested members of the public per week. Information distributed via the flyer box program includes ways to engage with the project team, community drop-in dates and details, Public Hearing virtual and in-person meeting opportunities, and other project related activities and information. Each time updated flyers are added to the flyer boxes, a sticker is placed on the box to indicate new information is available and to encourage continued distribution. Locations lacking reasonable distribution figures have been pulled over time, with new locations being installed as approvals permit. Transit stops (outdoor locations) have seen the highest distribution figures. Smaller businesses such as the East Montague Market and ABC Store (indoor locations) saw the lowest distribution and were thus pulled.

Similar to the May 2020 update, problems related to the flyer box program have continued to include litter and theft/vandalism of brochure boxes and realtor box stands. Transit stop locations #54 and #17, Save-A-Lot Food Store, and Russelldale Community Center have seen instances of theft or vandalism of the realtor boxes. The project team will evaluate risks and benefits before replacing the boxes at these locations.

#### ***Flyer Box Program Activities for 2021:***

As the situation with the public health concerns remains fluid, the plan for the flyer box program will be as well. The ultimate goal of the flyer box program is to get information into the hands of the public in a responsible, safe, and timely fashion to encourage meaningful public input. The team will continue to monitor daily news related to the current public health concerns and will provide a comprehensive directive on continuing this initiative.

#### ***July 2022 Update***

The project team plans to renew the flyer box program with 10 exterior and five (5) interior boxes beginning the week leading up to the Community Drop-in, which is scheduled for August. Flyer boxes will be replenished each week to monitor activity and reach. Yard signs are also recommended to be added to the flyer boxes as a visual attractant as they are reinstalled to ensure public awareness of the updated project information.

### **4.1.6 EJ Mitigation Outreach**

To receive feedback on the DRAFT EJ Community Mitigation Plan the project team worked to engage with members of the public, with a focused effort on EJ neighborhood residents. Feedback from the potentially impacted communities helped to guide the project team to better refine unresolved components in the DRAFT EJ Community Mitigation Plan. Community input has been essential to forming a mitigation plan that will best minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

### **December 2020 update:**

To facilitate full and fair participation by all potentially affected communities in the mitigation plan design, the project team developed a mitigation-specific survey to distribute to community drop-in attendees and EJ residents. The survey focuses on individual preferences regarding topics such as recreation amenities, recreation programs, affordable housing, educational and employment opportunities, infrastructure enhancements, neighborhood amenities, mitigation priorities, and project information dissemination. Demographic information, such as neighborhood of residence and ethnicity, was also included so the project team can determine how successful the survey was in reaching the EJ neighborhood residents. This information will help validate the data and support any decisions that are made regarding the revised mitigation plan. The survey, along with a self-addressed envelope and stamp, was mailed to each residence in the EJ neighborhoods as a part of a larger project information packet and was distributed to each resident who attended the community drop-ins. After a recommendation from the CAC, these materials were also sent to property owners who own land within the EJ communities but may not necessarily live there themselves.

The same content was also developed into an online survey that is available to the general public and anyone in the EJ community who prefers to use an online platform. All paper copies of the survey were entered into the online database by the project team to garner all input into a streamlined platform.

### **April 2021 Update**

At the end of the DEIS comment period on January 15, 2021, 199 surveys were submitted to the project team, 69 of those were completed online and 130 through the mail. A summary of the results of this survey can be studied in Appendix H, the EJ Community Mitigation Plan.

The project team hosted an Open House on March 6, 2021 to solicit detailed feedback from EJ residents on specific components within the Community Infrastructure Enhancement Plan (CIEP). This interactive meeting was hosted at the Ferndale Community Center, which is located within the EJ neighborhoods, to make attending as convenient as possible for EJ residents. The Open House was held in-person because past experiences have determined that real time interaction often garners higher levels of participation from attendees. Due to public health concerns related to the COVID-19 pandemic and the desire to keep attendees socially distanced, the CIEP Open House was held partially outdoors and partially in the large indoor setting of the Ferndale Community Center. The weather in North Charleston is often wet in early spring, so the project team prepared for inclement weather conditions by reserving a large outdoor tent with optional walls. The project team was also cognizant of other large and local events occurring in the spring and in an effort to increase attendance, the project team planned the Open House on a day that did not conflict with other events.

The goal of the CIEP Open House in March 2021 was to better understand residents' priorities on specific EJ infrastructure enhancement projects associated with the mitigation in the CIEP. Residents were given the opportunity to comment on and note "problem" locations for each of the CIEP categories including pedestrian safety and connectivity, stormwater drainage, conceptual lighting, aesthetics and landscaping, and traffic calming. Each of these categories were represented at a different station with large maps and project team members to help residents identify areas of infrastructure that need

improvements. Residents had the opportunity to place stickers on the maps to indicate specific locations and provide additional comments on the potential improvements. These identified locations were then compared to the CAC infrastructure mapping to better understand priorities throughout the EJ communities.

The project team worked closely with the CAC and the community liaisons to canvass the EJ neighborhoods and connect with local church leaders, schools, and other institutions to advertise the CIEP Open House. Postcards and handouts with surveys were mailed to each residence in the EJ neighborhoods, flyers were distributed to local businesses and transit stations, local officials signed a letter to residents to encourage participation, and meeting information was provided to local radio stations, television stations, and newspapers. In addition, the project team utilized contact information of EJ residents who participated in the EJ Community Mitigation Survey, to inform them about the follow-up opportunity to provide input at the CIEP Open House. The CAC also helped advertise the Open House by placing project branded signage in their front yards.

The CIEP Open House was well attended (77 participants) and the feedback provided by residents was extremely valuable to the project team as the EJ Community Mitigation Plan stretches into its final revision phase. In addition to the feedback received in person, the project team also received 85 surveys back, either online or via mail. Almost 90% of these surveys were submitted by EJ residents living in the impacted neighborhoods. In addition to the identified locations for improvements, results from the input received indicated the following highlights:

- Stormwater drainage and traffic calming were of highest priority
- 88% of participants wished to see lighting improvements
- 62% of participants prefer speed humps as a traffic calming mechanism
- 73% of participants would like to see either a community center mural or resident maintained mini-libraries installed
- The most popular personal and professional development classes include computer skills classes (29 votes) and CPR/First Aid (21 votes)

All recommendations that are derived from the CIEP Open House and survey results will be vetted through the City of North Charleston before being added to the Final EJ Community Mitigation Plan in the Final Environmental Impact Statement – Record of Decision.

In addition, the Community History Preservation Program kicked off in April 2021 to document the cultural history and character of the impacted EJ communities through the support of a qualified historian and photographer. EJ residents will be encouraged to participate by sharing oral history or historic photography of the history of the EJ neighborhoods. The final report and visual display will be incorporated at the proposed replacement community center.

#### ***EJ Mitigation Outreach Activities for 2021:***

To fulfill the EJ Community Mitigation Plan elements, outreach and EJ community engagement will continue into the mitigation phase of the project. During the second quarter of 2021, the project team will kick off partnerships with local organizations such as the Trident Urban League to provide

educational workshops and counseling on topics such as financial literacy and first-time home buyer basics. The goal of this outreach will be to assist impacted residents in securing residential loans and transitioning from renters to homeowners.

The community liaisons will focus on advertising these workshops and the Community History Preservation Program through the remainder of 2021. Additional mitigation outreach will be documented and added to this document as needed.

## 5.0 SUMMARY

Minority and low-income neighborhoods and businesses are located in the immediate vicinity of the proposed I-526 improvements. The roadway improvements are anticipated to result in property acquisition as well as increased noise, air, and roadway vibration impacts associated with future traffic volumes. Temporary impacts are associated with construction detours, staging areas, and other travel pattern disruptions are also anticipated.

This EJ Outreach Strategy was created to foster meaningful outreach, inform the project team's understanding of the community's needs, and guide the formulation of potential mitigation strategies for the impacts to the community. Design alternatives have been presented at community meetings within EJ neighborhoods with clear illustration of (1) the position of the center line of the roadway (post expansion) and (2) where the right-of-way would be placed. In addition, the draft EJ Community Mitigation plan has been presented to the public via mail, community drop-ins, and the project website in an effort to generate feedback on the proposed ideas.

Although there is no single methodology for EJ mitigation, there are best practices to consider and understand throughout the process. The following bulleted items summarize the best practices to be employed and fine-tuned throughout the project development process.

- Engage minority and low-income populations early and throughout the process;
- Maintain relationships with community members through the Community Office;
- Establish community connections;
- Maintain a community presence;
- Evaluate avoidance/minimization through design elements;
- Rely on local experience while developing/implementing mitigation plans;
- Craft an affordable housing replacement plan;
- Replace community and recreational facilities;
- Explore options for aesthetic enhancements;
- Improve multimodal access and mobility;
- Tailor and fine-tune outreach methods and mitigation plan based on community feedback; and
- Address concerns about noise, air quality, lighting, soil erosion, and flooding.

It is important to consider that affected minority and low-income populations may hold opposing technical or scientific views regarding specific impacts and/or methods of analysis and that these

opposing views may warrant discussion in the detailed community studies and Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS). Any responsible opposing view raised by the community which is considered to be inadequately addressed in the DEIS must be satisfactorily addressed in the FEIS (40 CFR §1502.9(b)).

## 6.0 EJ TEAM ROLES AND RESPONSIBILITIES

To ensure that the impacts on EJ neighborhoods are analyzed effectively and accurately, we have assembled a team of experienced and qualified professionals to develop and implement a unique EJ outreach strategy for the proposed 526 LCC WEST project. Table 6.1 details each EJ team member’s roles and responsibilities.

**Table 6.1: Team Member Roles and Responsibilities**

| Team Member                    | Title   | Role  | Contact Information          |
|--------------------------------|---|---|------------------------------|
| <b>LaTonya Derrick, PhD(c)</b> | NEPA/Public Engagement Specialist/EJ Task Co-Lead | Responsible for establishing community liaisons, identifying community connections, facilitating one-on-one, small group, and public meetings, and attending community/church events. Also responsible for evaluating community impacts and potential mitigation strategies | LaTonya.Derrick@stantec.com  |
| <b>Ryan White, PE</b>          | NEPA/Public Engagement Specialist/EJ Task Co-Lead | Responsible for establishing community liaisons, identifying community connections, facilitating small group/public meetings, and attending community/church events. Also responsible for evaluating community impacts and potential mitigation strategies                  | Ryan.White@stantec.com       |
| <b>Amy Sackaroff, AICP</b>     | Community Studies, EJ, and NEPA Specialist        | Responsible for coordinating development of the community impact assessment and development of EJ Mitigation Plan.  | Amy.Sackaroff@stantec.com    |
| <b>Emily Love, AICP</b>        | NEPA Specialist                                   | Responsible for researching replacement housing options, coordinating with local entities; preparing project information, conducting community impact assessment; assisting in preparation of community impact assessment.  | Emily.Love@stantec.com       |
| <b>Hannah Clements</b>         | NEPA Analyst                                      | Responsible for developing demographic data for EJ mitigation strategy. Also responsible for assisting in preparation of community impact assessment and preparing materials for CAC meetings.  | Hannah.Clements@stantec.com  |
| <b>Alexa Kennedy</b>           | GIS Specialist                                    | Responsible for developing demographic mapping for EJ mitigation strategy. Also responsible for assisting in development of community impact assessment.  | Alexa.Kennedy@stantec.com    |
| <b>Michael Wray</b>            | CIEP Task Lead                                    | Responsible for coordinating with experts regarding CIEP components, organizing the CIEP Open House, and providing CIEP recommendations to the City of North Charleston and SCDOT.  | Michaelg.Wray@stantec.com    |
| <b>Mollie Lipka</b>            | Graphic Designer                                  | Responsible for design of flyers, postcards, handouts, and other EJ outreach materials  | Mollie.Lipka@stantec.com     |
| <b>Claudia Thompson</b>        | Public Outreach Aide                              | Responsible for deployment and status updates for the Flyer Box Program   | Claudia.Thompson@stantec.com |



| Team Member                 | Title                            | Role  | Contact Information                |
|-----------------------------|----------------------------------|---|------------------------------------|
| <b>Andrea Dvorak-Grantz</b> | QA/QC, NEPA Specialist           | Responsible for QA/QC of EJ mitigation plan and community impact assessment.  | Andrea.Dvorak-Grantz@stantec.com   |
| <b>Dr. Jamelle Ellis</b>    | CAC Facilitator                  | Responsible for facilitating monthly CAC meetings and submitting meeting reports to the project team  | Empowermentstrategies.us@gmail.com |
| <b>Frances Bickley</b>      | SCDOT Relocation Manager         | Responsible for assisting with the identification of replacement affordable housing.  | bickleyfe@scdot.org                |
| <b>Chris Johnston</b>       | Relocation Assistance Specialist | Responsible for assisting with the identification of replacement affordable housing.  | johnstonwc@scdot.org               |
| <b>Shantelle Mears</b>      | FEIS-ROD Right-of Way Liaison    | Responsible for assisting with the identification of replacement affordable housing and serving as a resource at the Community Office for right-of-way related questions identification of replacement affordable housing.                    | syms.gma@gmail.com                 |
| <b>Bobby Mears</b>          | FEIS-ROD Right-of Way Liaison    | Responsible for assisting with the identification of replacement affordable housing and serving as a resource at the Community Office for right-of-way related questions.   | bmears1gpa@gmail.com               |
| <b>Annette McCrorey</b>     | DEIS Right-of Way Liaison        | Responsible for serving as a resource at the Community Office during the DEIS phase of the project for right-of-way related questions.  | amccrorey@thcinc.net               |
| <b>Willie Johnson</b>       | DEIS Right-of Way Liaison        | Responsible for serving as a resource at the Community Office during the DEIS phase of the project for right-of-way related questions.  | wjohnson@thcinc.net                |
| <b>Horrace Tobin</b>        | Community Office Manager         | Responsible for overseeing the daily operations of the Community Office and messaging to guests. Also responsible for updating the project team on community concerns as brought to the attention of the Community and Right-of-Way Liaisons. | Horrace.Tobin@stantec.com          |
| <b>Maxine Smith</b>         | Community Liaison                | Responsible for engaging with EJ neighborhood residents, staffing the project office, supporting a meeting plan for EJ-focused community meetings, and assisting with the CAC meetings.   | g02themax@aol.com                  |
| <b>Carolyn Lecque</b>       | Community Liaison                | Responsible for engaging with EJ neighborhood residents, staffing the project office, supporting a meeting plan for EJ-focused community meetings, and assisting with the CAC meetings.   | celecque@yahoo.com                 |
| <b>Mattese Lecque</b>       | Community Liaison                | Responsible for engaging with EJ neighborhood residents, staffing the project office, supporting a meeting plan for EJ-focused community meetings, and assisting with the CAC meetings.   | mlecque@yahoo.com                  |
| <b>Clay Middleton</b>       | Community Liaison                | Responsible for engaging with EJ neighborhood residents, staffing the project office, supporting a meeting plan for EJ-focused community meetings, and assisting with the CAC meetings.   | claynmiddleton@gmail.com           |
| <b>Gwendolyn Boyd</b>       | Community Liaison                | Responsible for engaging with EJ neighborhood residents, staffing the project office, supporting a meeting plan for EJ-focused community meetings, and assisting with the CAC meetings.   | boydgwendolyn32@gmail.com          |

NOTE: Table to be modified and updated throughout the project development process. Last revision: July 2022.

## 7.0 DOCUMENT REVISION/UPDATE HISTORY

This document was originally developed in mid-2019 and implemented in the months leading up to the November 2019 Public Meetings. Since that time, the document was updated to provide new information on the efficacy of outreach activities conducted in 2019 and how outreach plans for 2020 were refined considering the level of success for each activity. The following bullets include a running summary of notable updates for each EJ Outreach Strategy Update.

### ***May 2020 Status Update:***

- Community Drop-In's: Section 5.1.1 updated to note success of 2019 drop-ins and plans for 2020/2021.
- Pop-Up Meetings: Section 5.1.2 revised to highlight 2019 pop-up efforts, pop-up objectives and future meeting goals. 2020 pop-up ideas were updated to include festivals, fairs, and expos, in addition to project team hosted events.
- Community Advisory Council: Section 5.1.3 added to account for outreach efforts related to the Community Advisory Council. Includes CAC purpose, CAC members, past meeting topics, and future meetings planned in 2020/2021.
- Community Office: Section 5.1.4 added to account for outreach efforts related to the Community Office. Includes office purpose, current responsibilities and future opportunities for engagement in 2020/2021.
- Flyer Box Program: Section 5.1.5 was added to describe efforts related to distribution of project information in over 30 realtor-style boxes strategically placed throughout the project vicinity.
- Table 7.1: Revised to show team members added since original document was prepared.

### ***June 2020***

- SCDOT comments addressed and relocation mapping in Figure 3.3 revised.

### ***October 2020***

- Updated to incorporate public engagement plan.

### ***December 2020***

- Updated Figure 2.3 and Figure 2.6 for consistency
- Updated Figure 3.3 with most current ROW

- Updated Figure numbers throughout document
- Community Drop-In's: Section 4.1.1 updated to note details of 2020 drop-ins, COVID-19 procedures, and plans for 2021.
- Pop-Up Meetings: Section 4.1.2 revised to highlight 2020 pop-up efforts, pop-up objectives, COVID-19 procedures, and future meeting goals. 2021 pop-up ideas were updated to include festivals, fairs, and expos, in addition to project team hosted events.
- Community Advisory Council: Section 4.1.3 updated to highlight 2020 CAC activities and goals for 2021.
- Community Office/Community Liaisons: Section 4.1.4 updated to account for outreach efforts related to the Community Office and the Community Liaisons. Information added includes 2020 engagement efforts, current responsibilities, COVID-19 procedures, and potential future opportunities for engagement in 2021.
- Flyer Box Program: Section 4.1.5 was updated to describe efforts related to distribution of project information in outdoor realtor-style boxes and indoor acrylic stands strategically placed throughout the project vicinity.
- EJ Mitigation Outreach: Section 4.1.6 was added to document specific mitigation related outreach efforts.
- Table 7.1: Revised to show team members added or removed since the May 2020 update.
- Sent to CDM Smith and Maximum Consulting for review

#### **April 2021**

- Community Advisory Council: Section 4.1.3 was revised to include an update on CAC activities and engagement from December 2020 to April 2021
- Community Office/Community Liaison Activities: Section 4.1.4 was updated to include the uptick in Community Office activity, the addition of a weekly ROW liaison appointment opportunity, and how the community liaisons are adjusting from a purely virtual platform to more in-person outreach. Goals for 2021 were also updated.
- EJ Mitigation Outreach: Section 4.1.6 was updated to include the CIEP Open House and results from public input. EJ mitigation goals for 2021 were also updated.
- Table 6.1: Revised to show team members added since the December 2020 update. Table number revised.

## July 2022

- **Community Drop-In's:** Section 4.1.1 updated to note details of 2022 plans to present the final EJ Community Mitigation Plan.
- **Pop-Up Meetings:** Section 4.1.2 revised to list pop-up ideas for 2022 to help keep the local community up to date on project timing and schedule.
- **Community Advisory Council:** Section 4.1.3 updated to highlight 2022 CAC activities and goals as they transition to the POC.
- **Community Office/Community Liaisons:** Section 4.1.4 updated to account for outreach efforts related to the Community Office and the Community Liaisons in 2022.
- **Flyer Box Program:** Section 4.1.5 was updated to describe renewed efforts related to distribution of project information in outdoor realtor-style boxes and indoor acrylic stands strategically placed throughout the project vicinity.
- **Table 7.1:** Revised to show team members added or removed since the May 2020 update.

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# Appendix A: 2022 Outreach Technical Whitepaper





|               |   |       |  |
|---------------|---|-------|--|
| To:           | Joy Riley PE, PMP, CPM, DBIA<br>SC Department of Transportation | From: | LaTonya Derrick<br>Stantec Consulting Services Inc |
| Project/File: | 526 LCC WEST  | Date: | May 5, 2022  |

**Reference: 526 LCC WEST 2022 Engagement and Mitigation**

## **Environmental Justice Engagement and Mitigation Efforts for 2022 I-526 LOWCOUNTRY CORRIDOR WEST IMPROVEMENTS**

*This white paper was developed to facilitate discussions between SCDOT and FHWA on how to approach additional mitigation and EJ outreach in 2022 in consideration of the development of Charleston County's Airport Connector Road (ACR) project; revisions to relocation numbers since the DEIS publication based on a more conservative methodology; and the amount of time that has passed since the last EJ community engagement meeting (i.e., Community Infrastructure Enhancement Program workshop) in March 2021. The EJ Outreach Strategy and EJ Community Mitigation Plan will be updated once an approach is finalized.*

For the purposes of the I-526 Lowcountry Corridor (526 LCC) WEST project, an Environmental Justice (EJ) Community Mitigation Plan was developed to offset anticipated disproportionately high and adverse project impacts to EJ communities. EJ impacts were analyzed in accordance with EO 12898 (*Federal Actions to Address Environmental Justice to Minority and Low-Income Populations*), USDOT Order 5610.2(c) (*Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*), FHWA's EJ Order 6640.23A (*FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*), and FHWA's 2011 *Guidance on Environmental Justice and NEPA*.

Prior to the development of the EJ Community Mitigation Plan, an EJ Outreach Strategy was developed to meet public engagement requirements under Title VI of the 1964 Civil Rights Act under which, "No person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The following neighborhoods in North Charleston, South Carolina, which are proposed to face the highest level of disproportionately high and adverse impacts from the 526 LCC WEST project, are the primary focus of the EJ Community Mitigation Plan and the EJ Outreach Strategy: Ferndale, Highland Terrace, Liberty Park, and Russelldale. Approximately 70% of the residential relocations associated with the 526 LCC WEST project are within these four (4) neighborhoods. In addition to these neighborhoods, there are three other areas with EJ populations that will face impacts on a lesser scale including Wando Woods (on Ada Avenue), Charleston Farms, and Camps (on Seiberling Road and Ozark Street).

The goal of this discussion is to recognize the geographical context of these other EJ areas in order to understand how outreach will be conducted in these areas in 2022 and how the 526 LCC WEST EJ Community Mitigation plan will be applied to residents living in these areas.

## **1.0 ADDITIONAL EJ AREAS**

### **1.1 Camps Area (Seiberling Road and Ozark Street)**

#### ***Historical Context<sup>1</sup>***

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<sup>1</sup> Infrastructure Consulting and Engineering. Camps Community Summary. 2021. Email from Mulholland, R. January 12, 2022.

Reference: 526 LCC WEST

The Camps area name is derived from the encampments that Governor Charles Craven and his colonial troops formed in the area in 1715. After a stint as a cattle ranch and rice plantation in the 18<sup>th</sup> century, the area was occupied by phosphate miners. Residential areas did not develop in Camps until the 1950s as WWII spurred the establishment of military bases which resulted in an increase in the North Charleston population. The spur of residential development lasted until the late 1960s. According to a study completed by Brockington in 2020, the Camps residential area at this time extended from the intersection of Saul White Boulevard and West Montague Avenue to the intersection of Cindy Lane and West Montague Avenue. The construction of I-26 in the 1960s was the first transportation related project that drastically altered the landscape in the northern Camps area. Multiple residential and commercial structures were removed to make space for the interstate. By 1980, the area saw a need for a north-south connection, thus spurring the construction of I-526. Camps was ultimately bisected by the construction of I-526, which displaced additional residential and commercial structures and disrupted the integrity of the neighborhood. Further development in the 1990s and early 2000s, including the North Charleston Coliseum and associated parking, resulted in some of the last concentrated residential portions of Camps to be confined to three areas: one on each side of I-526 and a subdivision of townhomes called the Lake Palmetto Waterfront Townhomes.

### ***Camps Today***

According to the City of North Charleston Planning Department neighborhood mapping<sup>2</sup>, the current boundary of Camps extends from south of I-26 near the I-26 and West Montague Avenue interchange, along West Montague Avenue crossing I-526, and ends near the Dorchester Road and West Montague Avenue interchange. As noted above, there are three small residential areas in Camps which are separated by large tracts of commercially zoned land and the I-526 corridor. The Lake Palmetto Waterfront Townhomes are located at the north end of Camps, separated from the other residential areas, and not within the project study area. Therefore, the focus of residential areas in Camps for the purposes of this discussion will be the small areas directly west of the I-526 corridor along Firestone Road, Fargo Street, and West Montague Avenue and the area east of the I-526 corridor that follows Ozark Street and Seiberling Road.

The City's Planning Department maintains that Camps is not currently, nor has it historically been a cohesive community of residents. As such, Camps has not been represented on the North Charleston Neighborhood President's Association, which is an organization that supports the efforts of neighborhoods and homeowners associations in the City. To that end, it is designated as a "service area" for GIS and municipal planning purposes. Zoning over much of the area is General Commercial. Because Camps is not an established neighborhood, impacts and mitigation measures are more difficult to assess in a fair and orderly manner.

Census block group data for Camps area residents indicate the presence of an Environmental Justice community due to 91% minority and 36% low-income populations.<sup>3</sup> The Center for Disease Control (CDC) also notes that this area has a moderate to high (0.6388 on a scale of 0-1) level of vulnerability on the Social Vulnerability Index.<sup>4</sup> A high level of vulnerability indicates that residents in this census tract have a more difficult time preparing for and responding to hazardous events due to factors such as poverty, lack of adequate transportation, and crowded housing.<sup>5</sup>

## **1.2 Wando Woods (Ada Avenue)**

Homes on West Ada Avenue and East Ada Avenue are located south of the other EJ neighborhoods, directly south of Paramount Drive on either side of I-526. Although these homes are separate from the larger Wando Woods community, they are grouped with the Wando Woods neighborhood for GIS and municipal planning purposes.<sup>2</sup> The construction of I-526 bisected this community and likely displaced any homes that were built within the 400-foot corridor where I-526 now exists. Road Closed signs at the end of West Ada Avenue and East Ada Avenue still stand, indicating where this residential road once connected.

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<sup>2</sup> <https://arc.northcharleston.org/NCIMap/>

<sup>3</sup> 2017 American Community Survey (ACS) Census Block Group Data

<sup>4</sup> <https://svi.cdc.gov/map.html>

<sup>5</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/fact\\_sheet/fact\\_sheet.html](https://www.atsdr.cdc.gov/placeandhealth/svi/fact_sheet/fact_sheet.html)

Reference: 526 LCC WEST

Census block group data for Wando Woods residents indicate the presence of an Environmental Justice community due to an estimated 69% minority and 11% low-income populations.<sup>3</sup> The CDC also notes that this area has a moderate to high (0.6586 on a scale of 0-1) level of vulnerability on the Social Vulnerability Index.<sup>4</sup>

### 1.3 Charleston Farms

Charleston Farms is located directly east of I-26 and Rivers Avenue, and north of I-526, stopping near Remount Road. The neighborhood is a large primarily residential community but includes a small shopping center called Remount Village, several parks, and other community features. Charleston Farms has single-family, brick and vinyl housing, multiple mobile home parks, and various multi-family apartments. Filbin Creek borders this neighborhood to the south, running near I-526. The close proximity of this creek increases flood hazards for Charleston Farms residents, contributing to a high social vulnerability index of 0.9731 on a scale of 0-1.<sup>4</sup> Census block group data for Charleston Farms residents indicate the presence of an Environmental Justice community due to an estimated 80% minority and 51% low-income populations.<sup>3</sup>

## 2.0 PROGRAMMED PROJECTS & ANTICIPATED IMPACTS

EJ populations are facing impacts from the 526 LCC WEST project as well as additional future programmed projects in the area, including the Airport Connector Road (ACR) project. With the implementation of both projects, residences within these project corridors will be displaced. Details and impacts related to both projects are outlined as follows:

### 2.1 ACR

This project is spearheaded by Charleston County and funded by S.C. Department of Commerce and from federal sources through DOT. Its purpose is to separate airport and commuter traffic from traffic to and from the Boeing facility by providing direct access to Charleston International Airport from I-526. In addition, the project is to accommodate existing and future travel demands and improve mobility and operations of local roadways while complementing regional development plans. The few residential structures left in Camps, directly east and west of I-526, are located in the study area of this project. Although this project is still in its planning phase, the proposed reasonable alternatives account for the displacement of approximately 15 residential and five (5) commercial structures west of I-526 along Firestone Road, Fargo Street, and West Montague Avenue in the Camps area.<sup>6</sup>

### 2.2 526 LCC WEST

This project is state and federally funded. The purpose of the project is to increase capacity at the I-26/I-526 interchange and along the I-526 mainline, thereby relieving traffic congestion and improving operations at the I-26/I-526 interchange and along the I-526 mainline from Paul Cantrell Boulevard to Virginia Avenue. This project is also still in its preliminary engineering and environmental assessment phase. However, the Recommended Preferred Alternative identified in the Draft Environmental Impact Statement (DEIS) displaces approximately 141 residences total. As stated previously, about 70% of these displacements occur within the Ferndale, Highland Terrace, Liberty Park, and Russelldale neighborhoods. The remaining displacements are located along the I-526 and I-26 corridors in both North Charleston and West Ashley, including one (1) residence on Ada Avenue in the Wando Woods neighborhood, one (1) residence in Charleston Farms neighborhood, and nine (9) residences in the area known as Camps (east of the I-526 corridor, along Seiberling Road and Ozark Street).

There are no impacts to existing community centers in the Charleston Farms and Wando Woods neighborhoods, and the cumulative/indirect impacts are similar for these residents as those along the entirety of the project corridor.

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<sup>6</sup> Preliminary alternative designs and anticipated relocation numbers for the ACR project were available in September 2020 during which time the I-526 DEIS was in the last stages of approval prior to finalization in October 2020. The draft EA for the ACR project was first available March 2021.

Reference: 526 LCC WEST

All nine (9) of the residential impacts within the City of North Charleston's (the City's) boundaries defined as Camps are multi-family housing units. Although there are no specific community or recreational impacts from the 526 LCC WEST project, there are cumulative impacts associated with past transportation project-related impacts and disruptive local commercial developments. Also, as noted above, additional impacts are anticipated in this area from other planned transportation improvements.

## 3.0 RECOMMENDATIONS

### 3.1 EJ Outreach

It is recommended that the 526 LCC WEST project team **renew the flyer box deployment within all EJ communities** to provide project updates and project awareness in consideration of rent cycles and potential turnover in area residents since the last large-scale contact in March 2021.

Furthermore, it is recommended that the residents in the Camps area be given additional opportunities to interact with the project team in light of the proximity of the proposed ACR project and associated relocation impacts. I-526 serves as a clear division between direct impacts related to each project in the Camps area. Impacts associated with the 526 LC WEST project are located on the east side of I-526 while impacts associated with the ACR project are on the west side of I-526. Therefore, it is proposed that the 526 LCC WEST project team target outreach and mitigation efforts to residents living on the east side of I-526, and the ACR project focus on the residents living on the west side of I-526. In order to prevent public confusion between the two projects and any proposed mitigation, it is recommended that the **526 LCC WEST SCDOT project leadership closely coordinate with the ACR Charleston County project leadership** to ensure timely and appropriate outreach and engagement.

Additional outreach in the impacted EJ areas will meet the intent of EO 12898 and Title IV to provide opportunities for meaningful engagement, inform residents of any changes to relocation numbers since the DEIS, and gather feedback on updated project mitigation plans. Community meetings or "pop-ups" will be held throughout the implementation of the EJ Community Mitigation Plan to keep residents informed of the project schedule and to seek additional input on any mitigation-related commitments.

The desired outcomes of 2022 outreach efforts include the following:

- Elevate the level of engagement given the increase in potential relocations to low-income and minority residences in some areas
- Confirm that residents are aware of the project and have had the opportunity to engage at past public meetings
- Inform residents of changes to relocation numbers, reasons for the increase, right-of-way acquisition process, proposed housing mitigation, and Community Office contacts
- Provide residents with multiple channels and opportunities to ask questions and provide feedback on the project and proposed mitigation

### 3.2 EJ Community Mitigation

The EJ Community Mitigation Plan should be revisited to add any new information on Charleston Farms, Wando Woods, and Camps area resident needs and priorities resulting from 2022 outreach.

The following outlines how the project team plans to mitigate direct and cumulative impacts of the I-526 LCC WEST project to all affected EJ populations, including those living in Charleston Farms, Wando Woods, and the Camps area east of I-526. More information on the details of each component can be found in the I-526 LCC WEST EJ Community Mitigation Plan.



**Reference: 526 LCC WEST**

- Quality Affordable Housing – single family and multi-family style housing will be built prior to displacements
- Enhanced Right of Way Advisory Services – increased access to a right of way agent for better clarity on the acquisition process
- Acquisition Fairness Program – including free second opinion appraisals
- Enhanced Rental Assistance Program – provides rent supplements for a longer period of time
- Financial Literacy and First-time Home Buyer Counseling – group and individual classes starting in 2022
- First Time Home Buyer Grant Program –down payment assistance for first time homeowners
- College Aid Initiative – scholarships available for relocated and remaining residents in EJ communities. Awards totaling up to \$500,000
- School-to-Work Program – internship program for up to 20 high school or college students interested in the transportation industry
- Summer Transportation Institute Program – skill building program to expose high school students to opportunities in transportation
- Pre-employment Training – training and job readiness skills
- Community Office – available as a meeting place and consistent source of accurate project information
- Community Resource Guide – locally focused guide to help connect residents to community resources
- Community Workshops – focused on informational topics such as health/wellness, home repair, and financial wellness
- Small Business Development Program – Prioritize disadvantaged business enterprises for opportunities to work on the I-526 LCC projects

***Per request of the CAC, any revisions or additions to the EJ Community Mitigation Plan will be reviewed and approved by the Community Advisory Council (CAC) before additional public outreach is conducted.*** In addition, interested residents from the east side of the Camps area, Charleston Farms, and Wando Woods will have the opportunity to participate on the Project Oversight Committee as all 526 LCC WEST mitigation is implemented.

***Additional Mitigation for Camps area residents***

The Camps area specifically will be affected by implementation of both the I-526 LCC WEST and ACR projects, most notably by a decrease in the amount of residential land use in the area. However, the nature of the commercial and industrial land uses that make up the majority of the area are unlikely to change. Mitigation will also consider the cumulative impacts each project contributes to an area that has faced transportation project and commercial development related impacts multiple times in the past. In addition, each project is responsible for different impacts that will ultimately leave few homes left in an area with very little residential land use to begin with. There are no existing community centers, parks, or other community-based facilities that could be enhanced or preserved to strengthen cohesion of the residents living in this area. It is not likely prudent to propose new community facilities in the area given its predominantly non-residential setting. As such, it is recommended that mitigation for impacts on the east side of Camps focus on individual benefits that can apply to displaced residents as well as those that remain in the area. In addition to the listed mitigation above, the residents living on the east side of I-526 in the Camps area will benefit from the construction of a mitigation barrier to help reduce noise and shield the remaining residential areas from the interstate corridor.

## **4.0 SUMMARY**

Residents living in Wando Woods, Charleston Farms and the Camps area qualify as EJ populations due to the high percentage of minority and/or low-income residents according to 2017 ACS block group data. Residents on Ada Avenue in the Wando Woods neighborhood and residents living in the informal Camps area face both cumulative and direct impacts associated with past projects and with the proposed I-526 LCC WEST project. Residents in the Charleston Farms neighborhood will also be directly impacted by the project.

The I-526 LCC WEST project team will renew the flyer box deployment within all EJ areas to provide project updates and project awareness in consideration of rent cycles and potential turnover in area residents since the last large-scale contact in March 2021. Community meetings or “pop-ups” will also be held in 2022 to provide updates on the EJ Community Mitigation Plan. Additional outreach will be provided throughout the implementation of the EJ Community

Reference: 526 LCC WEST

Mitigation Plan to keep residents informed of the project schedule and to seek additional input on any mitigation-related commitments. Specific consideration will be given to distinguish the I-526 LCC WEST project from the ACR project in the Camps area avoid confusion between the two projects given their close proximity to one another.

Although the EJ Community Mitigation Plan for the I-526 LCC WEST project was intended to focus mitigation efforts on neighborhoods with the highest impacts, it also includes programs available for all areas with impacted EJ populations. As described in Section 3.2, these initiatives give all impacted EJ residents the opportunity to benefit from employment programs, educational and right of way counseling, grant programs, and other opportunities to help increase quality of life and create a foundation for generational wealth building.

## 5.0 REFERENCES

- Brockington. Cultural Resources Survey of the Airport Connector Road Project Charleston County, South Carolina. July 2020.
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- Agency for Toxic Substances and Disease Registry. CDC's Social Vulnerability Index (SVI). <https://svi.cdc.gov/map.html>. Accessed May 5, 2022.

Thank you,

**Stantec Consulting Services Inc.**



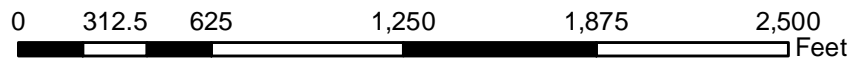
**LaTonya Derrick**  
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**Legend**

|                        |                             |
|------------------------|-----------------------------|
| Proposed ROW           | <b>Potential Relocation</b> |
| Charleston Farms       | Apartment                   |
| Municipal Service Area | Single Family Residence     |



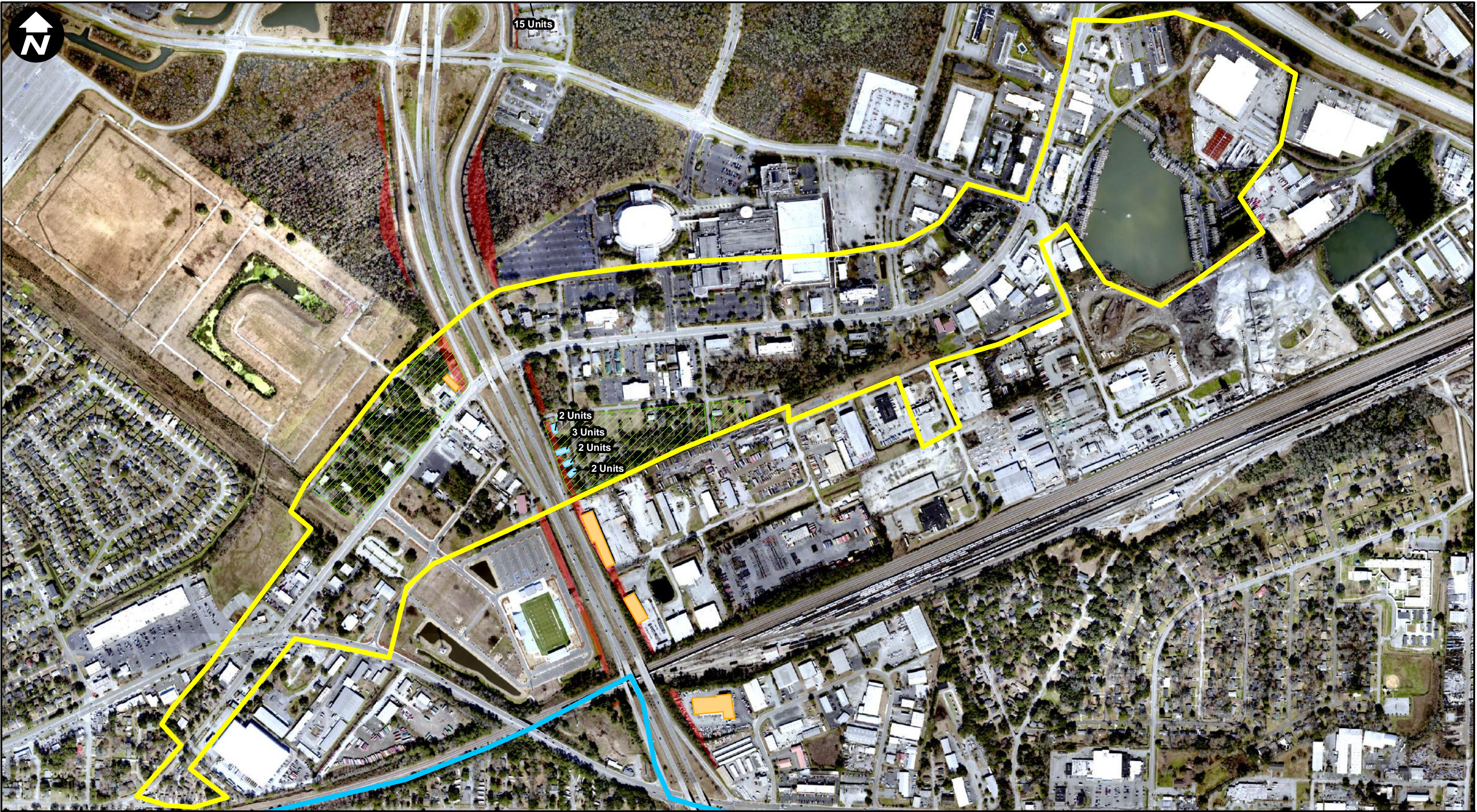
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Charleston County, SC







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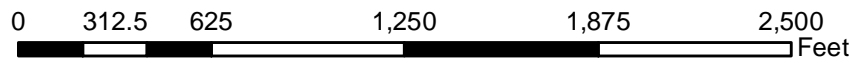
5 Units  
5 Units





**Legend**

|   |   |  |
|---|---|--|
|  Proposed ROW           | <b>Municipal Service Area</b>   | <b>Potential Relocation</b>  |
|  Camps Residential Area |  Camps       |  Apartment  |
|   |  Wando Woods |  Commercial |

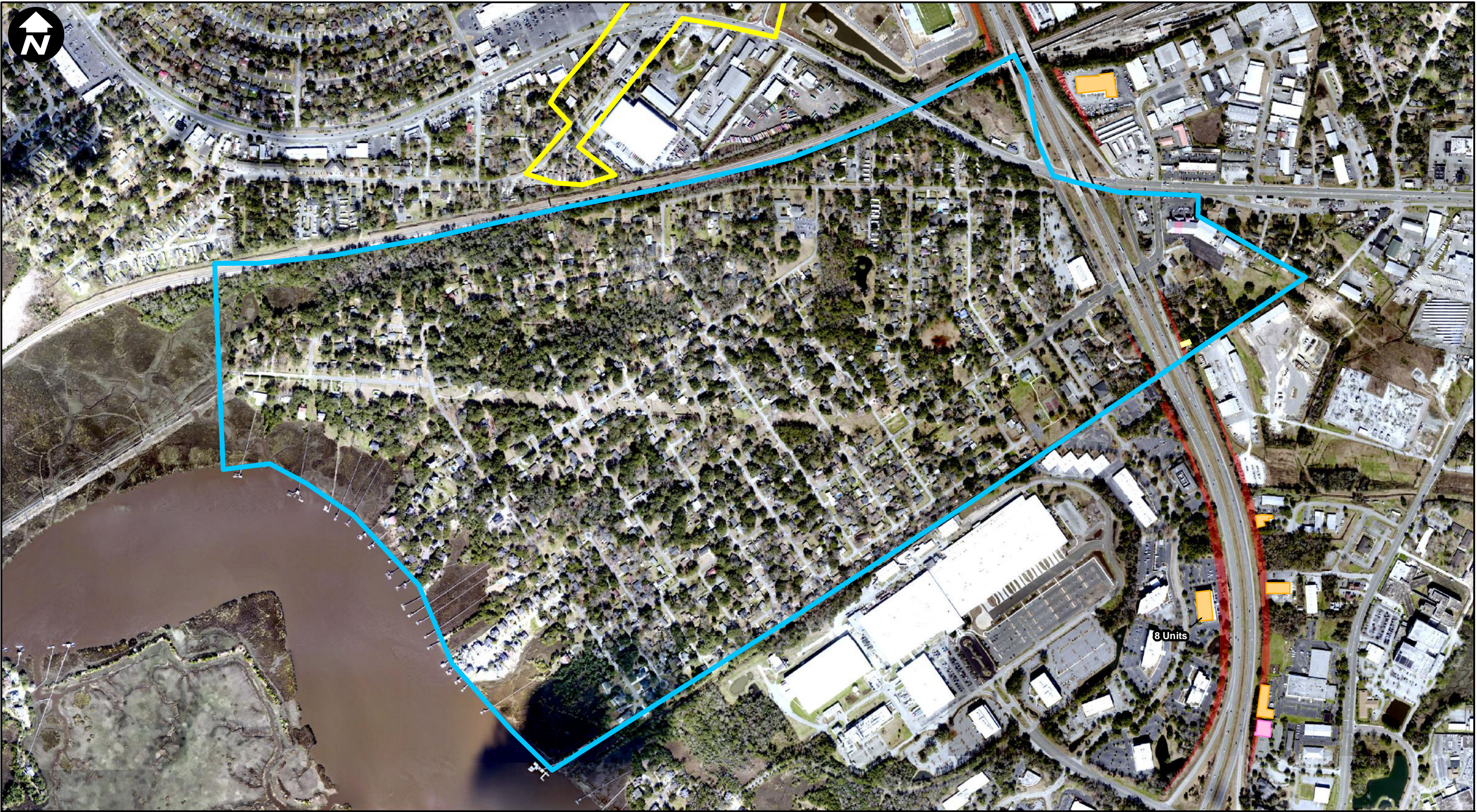


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
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Charleston County, SC

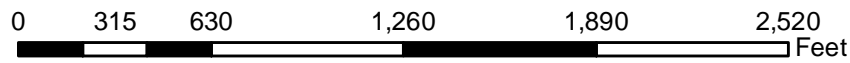
Revised: 7/18/22





**Legend**

|   |   |
|---|---|
|  Proposed ROW | <b>Potential Relocation</b>   |
| <b>Municipal Service Area</b>   |  Commercial              |
|  Camps        |  Institutional           |
|  Wando Woods  |  Single Family Residence |



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Winter 2022**

I-526 Lowcountry Corridor WEST  
Charleston County, SC

Revised: 7/18/22