

Attachment D: Summary of Public Comment

This attachment summarizes key themes from the public comment at the December 14, 2022 Stakeholder Engagement Meeting. For an English language transcript of the meeting, see Attachment C.

Key themes include the following, and are described in more detail below:

- Address all types of EJ impacts, including those affecting farm and agricultural workers.
- Issue an Executive Order on Environmental Justice.
- Direct resources to EJ communities and ensure that they are targeted to redress inequities (e.g. pollution reduction, infrastructure improvements, expanded health services).
- Update standard practices at Cabinet Agencies to include environmental justice and civil rights enforcement.
- Develop and implement a robust cumulative impacts analysis methodology.
- Enact new regulations and legislation.
- Increase Cabinet Agency staff capacity.

Address all types of EJ Impacts, including:

- Address water pollution, especially from PFAS and E. coli.
- Address inadequate water infrastructure for Black residents of unincorporated areas, which is worsening due to risks from climate change (e.g., salt water intrusion into underground aquifers, drought) and rising flood insurance rates.
- Replace lead pipes in drinking water infrastructure.
- Address high costs of water treatment that get passed along to community residents associated with trying to make river water drinkable/potable in communities downstream from industry.
- Address cumulative air and water quality impacts from hog waste lagoons, burning chicken waste and toxic fumes from wood pellet operations.
- Address confined animal feeding operations, including noxious odors, runoff from waste lagoons, spray fields adjacent to residential properties, constant noise as well as health impacts (e.g., pneumonia, infectious diseases from rodent and mosquito infestations).
- Address unregulated poultry waste disposal, which impacts water sources in areas that depend on well water.
- Address roads with inadequate traffic calming and safety infrastructure, especially in rural, low wealth areas.
- Address hurricane evacuation routes where the road infrastructure is not being adequately maintained.

Issue an Executive Order on Environmental Justice

- Make the E.O. applicable to all environment and policy decisions by Cabinet agencies.
- State clear goals and provide adequate supporting staff capacity and resources (training, budget, FTE's).

- Define EJ communities relative to community composition, vulnerability and disparate pollution burdens borne by residents.
- Define terms, expectations, guidelines and metrics for assessment and funding.
- Evaluate and address cumulative impacts from multiple sources of pollution, including the impact on public health and the climate.
- Conduct data collection and develop mapping tools to support agency decision-making.
- Direct agencies to uphold and enforce their obligations under the Federal Civil Rights Act of 1964.
- Direct agencies to invest in EJ communities, including via communication plans tailored to EJ communities and technical support for grant applicants.
- Direct agencies to directly engage impacted residents in solutions-development.
- Direct agencies to value residents over industry and companies.

Direct resources to EJ communities

- Direct agencies to invest in EJ communities, including via communication plans tailored to EJ communities and technical support for grant applicants.
- Get funding to EJ communities as soon as possible to begin addressing existing impacts.
- New Federal funding should address racial inequity and access to water, sewer and stormwater and flood mitigation infrastructure.
- Ensure that rural communities receive the same benefits as urban and suburban communities.
- Conduct public messaging campaigns to notify residents of health risks from poultry waste disposal.

Update Standard Practices at Cabinet Agencies

- Include environmental justice metrics in health assessments across all 100 counties in North Carolina and map the health impacts and disparities.
- When conducting community engagement, be sure to include community residents, not just Environmental Justice leaders.
- Make it easier to file a pesticide incident report in Spanish to the Department of Agriculture.

Develop and Implement a Robust Cumulative Impacts Analysis Methodology

- Use cumulative impacts analysis in permitting decisions at DEQ and other agencies that issue permits.
- When evaluating EJ impacts, use evaluation methodologies that can take into account neighborhood-scale geographic areas, the community's own identification of environmental concerns, the concentration of historic and ongoing pollution from all sources, and the ecological context in which these concentrations are found.

Enact New Regulations and Legislation

- DEQ and the Department of Agriculture should work with the General Assembly to enact regulation around poultry waste disposal.

- Require a permit for air quality monitoring related to swine industry facilities, pesticide usage, and poultry farms.
- The General Assembly should enact legislative actions that complement E.O. 246.

Increase Cabinet Agency Staff Capacity

- Provide at least five people focused on environmental justice in each agency (excluding administrative staff, clerks and other support personnel).
- Survey existing staff to assess if they are understaffed or overworked and increase staffing accordingly.
- Provide communications staff who can do translation and develop communications materials to support all Cabinet Agencies' Environmental Justice and community engagement work, including the capacity to turn around outreach materials with two weeks notice.