



Virtual Public Involvement Practices in NEPA

Michigan Department of Transportation Interstate-375

This case study discusses virtual public involvement (VPI) strategies implemented by the Michigan Department of Transportation (MDOT) to help meet National Environmental Policy Act (NEPA) public hearing requirements for the Interstate (I)-375 Improvement Project. The Federal Highway Administration (FHWA) typically requires that agencies hold in-person public hearings, in accordance with 23 U.S. Code (U.S.C.) § 128. MDOT held a virtual comment session and in-person public hearing in January 2021. MDOT worked to ensure that access to the virtual comment session would be as easy as possible for underserved populations in the project area.



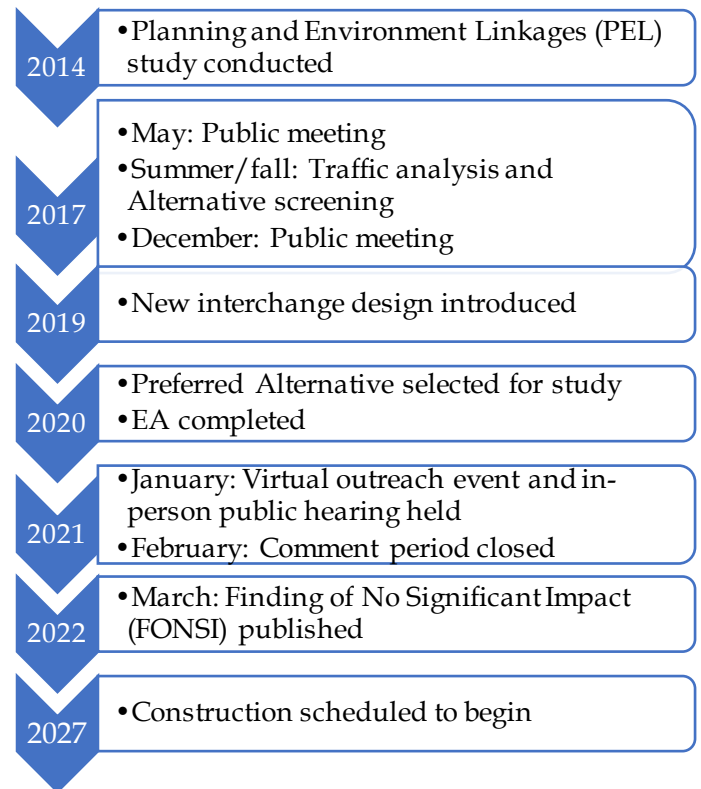
I-375 Improvement Project Background

I-375 is a one-mile-long freeway that connects I-75 directly to Jefferson

Avenue in Detroit, Michigan. Neighborhoods surrounding the freeway have high concentrations of environmental justice (EJ) populations. I-375 was constructed in the historical footprint of two neighborhoods, Paradise Valley and Black Bottom, both thriving with African American business and residential centers which were largely demolished in the 1950's to make way for I-375. The I-375 Improvement Project will replace the deteriorating sunken Interstate segment with a street-level boulevard to improve safety and connectivity while fostering local economic development.



Figure 1. Map of the boulevard portion of the preferred alternative for the I-375 Improvement Project. Source: I-375 Project Brochure



In 2020, the Michigan Department of Transportation (MDOT) selected a preferred alternative for study, and developed an environmental assessment (EA), which was released for public review and comment

on January 5, 2021. The comment period remained open through February 19, 2021.

In November 2020, MDOT worked with the FHWA Michigan Division Office and the FHWA Office of Project Development and Environmental Review (HEPE) to develop a project-specific public hearing plan for the I-375 Improvement Project. The plan outlined a hybrid approach to the public hearing: an in-person public hearing and live virtual comment session documented as part of the project record. The plan also included an advertisement strategy that incorporated traditional and VPI approaches.



Project-Specific VPI Approach

MDOT used a variety of VPI and traditional outreach strategies for public outreach for the I-375 Improvement Project public hearing. MDOT held its virtual comment session on January 27, 2021, the day before the in-person public hearing on January 28. At the virtual comment session, which included options for people to participate via a virtual platform, or by telephone, MDOT played a pre-recorded, narrated presentation with closed captioning, and allowed time for the audience to ask questions. MDOT played the same presentation at the in-person public hearing the following day. MDOT also collected comments through a live event form online or that were received over the phone.

The I-375 Improvement [Project website](#) hosted resources and information for the public to learn about the project and provided a comment form for people to provide input. MDOT also posted a recorded presentation about the project [on its video sharing channel](#). Additionally, MDOT used social media to advertise the virtual comment session and public hearing.



Figure 2. Screenshot of the pre-recorded public hearing presentation video, played at the I-375 Improvement Project virtual outreach event and in-person public hearing. Source: MDOT.

More traditional outreach methods also included press releases, printed newspaper notices, a [comprehensive brochure](#), and flyers to ensure community members had information in hard-copy format and could participate more effectively in both the virtual comment session and in-person public hearing. MDOT also offered through its printed notices an option for interested recipients to request by mail any components of a document or presentation of the I-375 project. At the in-person public hearing, MDOT provided printed copies of the EA and flash drives containing the EA. MDOT also offered to email the [public hearing presentation](#) and hold one-on-one meetings with anyone experiencing trouble accessing virtual materials or the virtual comment session.

In addition to comments collected via the live virtual comment session, the in-person public hearing, and the website, MDOT collected comments on the EA via a dedicated project email address, by phone, or by mail.



Challenges

MDOT experienced some technological challenges in its use of VPI strategies for the live virtual comment session. Since some stakeholders for the I-375 Improvement Project have limited broadband access, MDOT utilized a virtual platform, which provided a call-in option while also allowing participants to simultaneously view the presentation. MDOT heard from stakeholders that

they found some virtual platforms more challenging to navigate compared to others. MDOT also found that some virtual platforms' video capabilities were more limited.



Reaching Underserved Populations

Based on the American Association of State Highway and Transportation Officials' research on the [effectiveness of social media to reach EJ populations](#), as well as coordination with the FHWA Michigan Division Office and FHWA HEPE, MDOT determined that using social media to engage EJ communities would be an effective strategy. Additionally, MDOT designed all website content and virtual brochures for display on both computers and mobile phones.

MDOT believed that traditional outreach methods would be the most effective tool for engaging underserved populations with limited internet access. Because of this, MDOT distributed the public hearing brochure to all residents located within a half-mile radius of the project area, beyond the quarter mile radius used in the social and economic analysis for the project. The brochure was also posted in public places such as local grocery stores. Written in plain language, the brochure included information about how the public could participate in the virtual comment session via phone or attend the public hearing in-person. Each page provided MDOT staff contact information. Spanish and Arabic translations of the brochure were available upon request.

Further, MDOT conducted outreach directly with community leaders. For example, the I-375 Improvement Project team met with a local advisory committee and government advisory committee which were established to foster two-way communication between the project team and stakeholders to inform key decisions. The project team also held 70 one-on-one meetings and organized neighborhood meetings to share information and obtain feedback relevant to EJ stakeholders. As a result of the public involvement

process on the project, MDOT agreed to create a community-based Local Advisory Committee to advise MDOT on preparation and implementation of a Community Enhancements Plan that will provide additional mitigation to address the historic social and environmental effects of the original construction of I-375.



Benefits of Virtual Public Hearings and VPI

MDOT believed using VPI strategies helped the agency reach more of the community than through use of traditional outreach methods alone. In particular, MDOT noted that use of VPI strategies appeared to help increase opportunities for communication transparency and two-way dialogue with the public. MDOT also believes that VPI strategies can be used for many types of transportation projects.

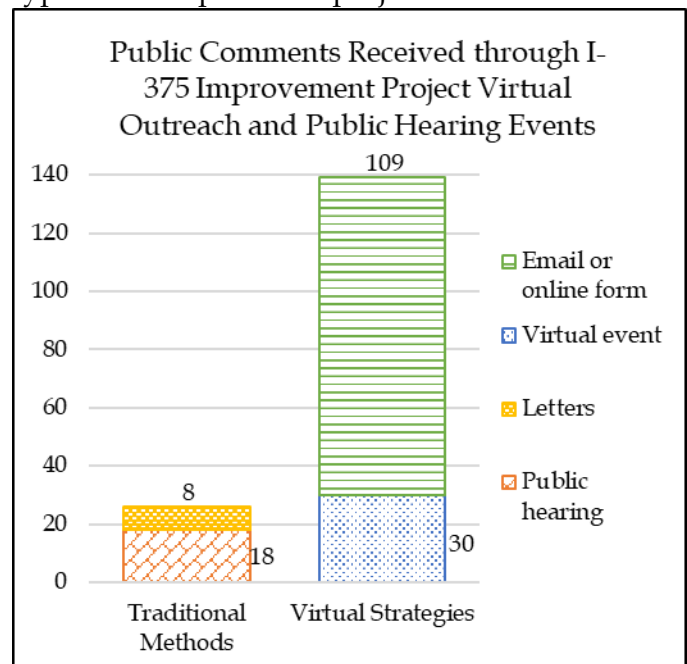


Figure 3. Public participation at the in-person public hearing compared to the virtual outreach event for the I-375 Improvement Project. Note: 32 registered for the in-person public hearing event with only 22 attending.

MDOT reported that 22 people attended the in-person public hearing, and 169 people participated in the virtual comment session; additionally, there



was a relatively high level of overall public engagement (shown in Figure 3). Registrants for the virtual event could sign up on the project website to receive reminders the day before the event and or request an automatic call to connect them to the meeting, which MDOT believed also contributed to increased participation.

MDOT noted that the relatively high level of engagement in the project and number of comments received might be attributed to many factors that include the use of VPI strategies, project elements of high public interest, and MDOT's extensive outreach throughout the life of the project.



Lessons Learned

Start early, thoroughly plan outreach, and allow for enough preparation time.

The project team for the I-375 Improvement Project, in coordination with FHWA Michigan Division, began preparing for the January 2021 public hearing in August 2020. Strategic timing is critical; it is important to not start too early to avoid unnecessary changes, or too late that there is not enough preparation time.

Practice and planning of logistics are key. The I-375 Improvement Project team held numerous dry runs prior to both the virtual comment session and in-person public hearing. Staff established clear roles and responsibilities for both events. The dry runs for the virtual comment session, in particular, ensured staff familiarity and comfort with the virtual platform and allowed the project team to adequately assess the number of personnel needed to respond to any questions, provide technical support to participants if needed, assist to mute and unmute speaker audio connections, and provide other support functions.

Offering technical assistance to the public in advance of any virtual outreach is crucial. For the I-375 Improvement Project, MDOT ensured that staff could offer technical support to event participants. In advance of the event, MDOT communicated with registrants via press releases

and social media postings on how to join the virtual comment session meeting and use meeting room functionalities. MDOT also noted that allowing participants the option to log-in to the meeting early can allow time for staff to assist participants in troubleshooting technical difficulties. Additionally, MDOT reported that event hosts can make use of a virtual waiting room or chat feature to communicate with the public in advance of or during a meeting. This can assist agency staff in responding to any questions that participants might have about meeting delays or other issues.

Provide opportunities for the public to ask questions prior to submitting comments, including opportunities for one-on-one interactions. MDOT designed the virtual comment session (held the day before the in-person public hearing) as an opportunity for staff to respond to the public's questions before the public hearing. However, the virtual comment session did not easily allow for MDOT to answer more informal questions that the public might not have wanted to submit for the public record. MDOT noted that while virtual engagement can assist in reaching broader populations, it may offer fewer opportunities for one-on-one, more informal interactions with the public.

Maintain consistent messaging throughout the NEPA public involvement process and across virtual and in-person platforms. The I-375 Improvement Project team developed a narrated, closed-captioned presentation video, and played it at the virtual comment session and the public hearing so that all attendees received the same information. Recording the presentation ahead of time also ensured that the project team had adequate capacity to manage the events and focus on receiving and responding to comments.



Next Steps

FHWA issued a Finding of No Significant Impact (FONSI) for the I-375 Improvement Project in March 2022. Planned construction begins in spring 2025

but MDOT will pursue opportunities to begin earlier.

Moving forward, MDOT will continue to experiment with using different VPI tools and technologies as part of its public outreach processes, including hybrid approaches where traditional and virtual strategies are used in a complementary way. The agency is also working toward developing a more robust public involvement management strategy to more formally document and suggest a

more standardized structure for how public input can be incorporated from a variety of outreach methods.

One MDOT staff noted: “We have unprecedented engagement with people, through the use of VPI, who we could never get to come to public meetings...In so many cases, we reach more people than we do through traditional public involvement. That’s really exciting and promising looking ahead.”

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For more information on virtual public involvement (VPI) refer to the following website:
https://www.fhwa.dot.gov/planning/public_involvement/vpi/

For more information on NEPA public hearing requirements refer to the following website:
https://www.environment.fhwa.dot.gov/nepa/trans_decisionmaking.aspx

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