



# Virtual Public Involvement Practices in NEPA

## South Carolina Department of Transportation Interstate-526 Lowcountry Corridor WEST

This case study discusses virtual public involvement (VPI) strategies implemented by the South Carolina Department of Transportation (SCDOT) to help meet National Environmental Policy Act (NEPA) public hearing requirements for the Interstate (I)-526 Lowcountry Corridor (LCC) WEST 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. SCDOT held a hybrid public hearing in December 2020 and January 2021 with both virtual and in-person participation options. As part of the I-526 LCC WEST project, SCDOT also conducted outreach efforts specifically aimed toward reaching underserved populations in the project area to share information and to shape mitigation activities to address disproportionately high and adverse impacts.



### I-526 LCC WEST Project Background

I-526 LCC is a 23-mile connection between West Ashley and Mount Pleasant in Charleston County, South Carolina. After conducting initial traffic and environmental studies, SCDOT determined that two separate projects were needed: I-526 LCC WEST and I-526 LCC EAST (currently in the planning phase and not detailed in this case study).

I-526 LCC WEST runs approximately 9.7 miles between Paul Cantrell Boulevard in West Ashley

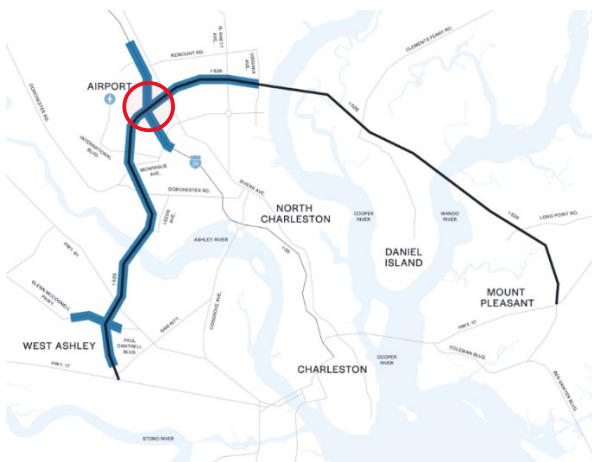
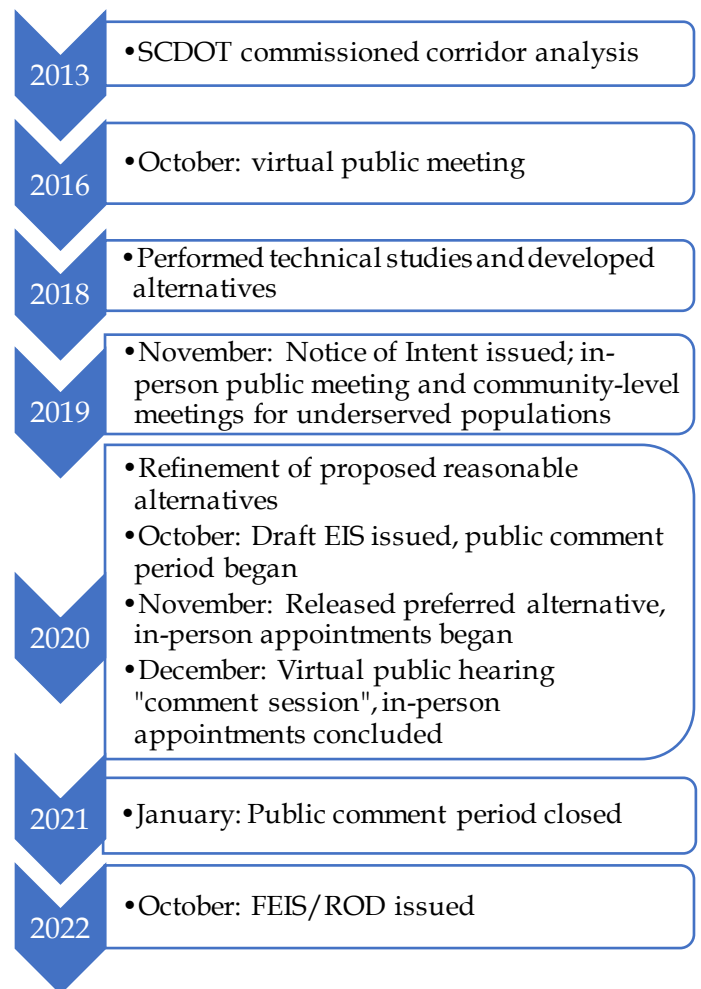


Figure 1. Map of the I-526 LCC WEST in Charleston County, SC. The I-526/I-26 interchange, indicated by the red circle on the map, is the major source of congestion for the corridor. Source: SCDOT.



and Virginia Avenue in North Charleston (Figure 1). The preferred alternative will improve corridor interchanges and widen the highway from four lanes to eight lanes to address congestion.

SCDOT performed an environmental justice (EJ) analysis to identify the existence of minority and/or low-income populations within the project study area and address any adverse or disproportionately high and adverse effects. The analysis identified eight neighborhoods in the project study area as EJ communities, as well as limited English proficiency (LEP) populations. SCDOT expects that the I-526 LCC WEST project would lead to disproportionately high and adverse effects on six of the eight EJ neighborhoods if mitigation are not applied. As of May 2022, potential impacts include the displacement of 43 single-family homes, 11 mobile homes, 72 apartment units, 69 businesses, 2 community centers, and 1 church.



### Project-Specific VPI Approach

The SCDOT, in coordination with FHWA, held a **hybrid public hearing consisting of a live, virtual public hearing “comment session” and individual, in-person appointments** on six days in November and December 2020. SCDOT accepted comments through the virtual public hearing “comment session,” at in-person appointments, through the project website, project email, project hotline, and by mail from October 30, 2020, through January 15, 2021. Comments received through all these options were considered part of the project record.

The live, virtual public hearing “comment session” was held on December 15, 2020, using a virtual platform that allowed participants to hear a presentation and provide comments through an internet browser, through a pre-recorded voice message, or over the phone. The virtual public hearing began with a 20-minute [introductory video](#). Next, the moderator played participants’ pre-recorded voice messages received to date from the project telephone hotline, and then those that pre-registered were provided an opportunity to leave a

verbal comment. The project team posted a recording of the virtual public hearing to the [project website](#) and the [project video sharing channel](#).

The team also offered individual, in-person appointments at a dedicated project office in North Charleston. The 50-minute appointment blocks included both weekends and weekdays at varied times to accommodate different working schedules. Individuals could schedule appointments by visiting the project website or calling or texting the project office. The project office also accepted walk-ins. Visitors were able to view all project materials at these appointments and provide comments for the project record.

SCDOT also created two project websites, both available in English and Spanish, to allow stakeholders to view public hearing materials: [a 360-degree virtual reality public hearing room](#) (Figure 2) and an accessible, [traditional website](#). Additionally, the project website featured a live chat function for individuals to ask questions or submit comments for the public hearing record.



Figure 2. Screenshot of the I-526 Lowcountry Corridor WEST virtual reality public hearing room. Source: SCDOT.

SCDOT carried out extensive marketing efforts to ensure that members of the public knew about the virtual public hearing “comment session,” the in-person appointments, and the associated comment period. These efforts included sending postcards and purchasing ads on digital platforms, streaming services, and radio, as well as posting announcements on traditional and digital billboards, road signs, on-bus advertisements, and flyer boxes at locations convenient to the public,



such as transit stops.



## Challenges

SCDOT noted that ensuring the inclusion of EJ populations in I-526 LCC WEST public involvement efforts has been challenging since the same EJ neighborhoods potentially facing disproportionately high and adverse effects from the project also experienced displacements and disconnection 40 to 70 years ago from I-526 and I-26 original construction.

SCDOT initially planned to engage the public through face-to-face communications and community events but switched to offering a hybrid public hearing.



Figure 3. SCDOT set up tents and held in-person events in neighborhoods that would be most impacted by the project. Source: SCDOT.



## Reaching Underserved Populations

SCDOT's relationships with community leaders and cultural institutions allowed the project team to reach more residents, build trust, and tailor its outreach strategy to EJ and LEP communities. SCDOT opened a dedicated project office in North Charleston in November 2019, which will remain open until the conclusion of the project. SCDOT also convened a Community Advisory Council (CAC) in September 2019 comprised of homeowners, tenants, business and property owners, and religious leaders who represent the potentially impacted EJ neighborhoods to provide

input on the project, advise the project team on outreach activities to underserved populations, and help form a community mitigation plan for the community's consideration and input.

The SCDOT adapted CAC meetings to be primarily virtual. SCDOT also invited CAC members who could not access the virtual meetings due to lack of internet access or unfamiliarity with the platform to come to the community office for technical assistance. SCDOT also visited some CAC members' homes to troubleshoot technical issues and ensure they could access the virtual CAC meetings. Additionally, the project team made staff available for informal discussions in the potentially impacted areas of the EJ communities (Figure 3) to provide information about the project and potential impacts and mitigation.

With fewer opportunities to interact with the EJ communities at in-person events, the project team placed a greater emphasis on outreaching to EJ communities through multiple marketing strategies such as flyer boxes and on-bus advertisements (Figure 4). SCDOT provided paper public hearing materials and surveys with pre-stamped envelopes for returning comments and surveys. In addition to physical advertisements, the project team creatively employed digital outreach strategies, such as geotargeting of advertisements, to reach EJ populations.



Figure 4. Bus wrapped in an advertisement for the I-526 LCC WEST public comment period. Source: SCDOT





## Benefits of a Virtual Public Hearing and VPI

SCDOT used multiple outreach options designed to accommodate community members' different schedules, comfort levels with technology, and language needs. Communication on digital forums was made available in both English and Spanish. SCDOT received feedback through all the forums it offered, though most comments were received through the public website (Figure 5).

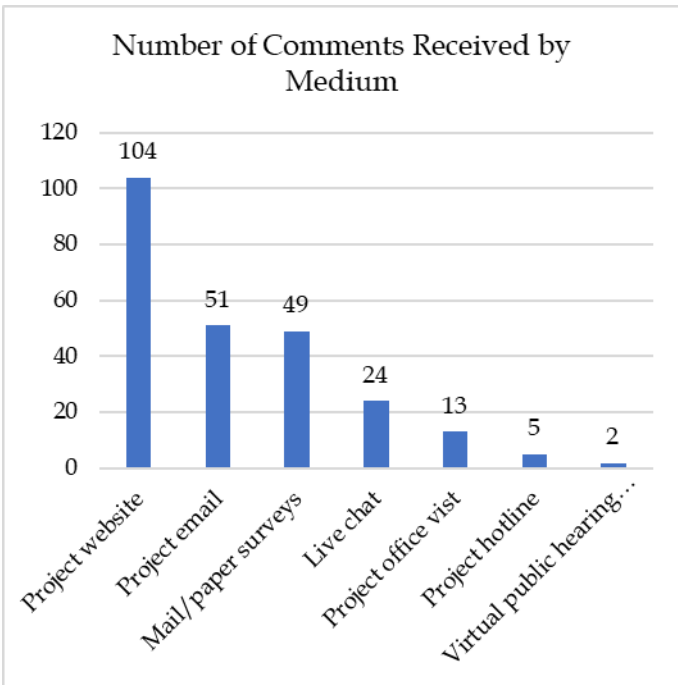


Figure 5. Number of comments received on the I-526 Lowcountry Corridor WEST project during the public hearing comment period by medium. Source: SCDOT.

VPI efforts enabled SCDOT to present project information to a much larger audience as compared to traditional outreach methods. At the end of the comment period, the project website logged over 8,000 visitors and the virtual hearing room recorded nearly 1,000 clicks. In comparison, SCDOT noted that traditional hearing materials presented in-person typically only reach hundreds of people.

The VPI efforts permitted SCDOT to engage more people than an entirely in-person hearing would have allowed. As Figure 5 demonstrates, most

participants chose virtual commenting methods instead of in-person methods.



## Lessons Learned

**By taking a hybrid approach to the public hearing, SCDOT met the requirements of 23 U.S.C. 128 while providing a variety of opportunities for community members to provide input.**

Establishing a dedicated project office allowed SCDOT to offer individual, in-person appointments and increase personal attention to constituents. SCDOT found that the community chose to use virtual options to provide input far more often than in-person options; participants also chose to use all the virtual commenting options available. SCDOT noted low turnout for the virtual public hearing "comment session." SCDOT believes that a format more familiar to the community, such as live videoconferencing, might have resulted in greater participation.

**Market public involvement opportunities to stakeholders using multiple forums to reach broad populations where they are.** SCDOT advertised the project website on billboards and buses in the project area, flyers, social media posts, television news segments, and digital ads on the radio and music streaming platforms. This allowed SCDOT to reach stakeholders in places that they frequent or forums that are comfortable to them. SCDOT staff believe that more tailored marketing and use of more familiar platforms would encourage more participation.

**VPI efforts cannot fully replace face-to-face outreach and relationships.** The SCDOT built strong relationships with EJ communities through in-person engagement. These relationships provided a foundation for SCDOT to implement VPI strategies more effectively for EJ outreach. SCDOT believes that these strategies would have been less effective without having first built trusting relationships through face-to-face outreach with EJ community leaders and residents.





## Next Steps

The comment period for the I-526 LCC WEST project closed on January 15, 2021. SCDOT and FHWA approved the Final EIS and Record of Decision in October 2022, which incorporated additional mitigation and design elements based on public and agency input. The additional changes provided for an improved community mitigation plan and improved design elements on the proposed project. Right-of-way acquisition will likely occur from 2024 to 2027. Construction is expected to begin in 2028 and last through 2040.

**SCDOT plans to continue using VPI strategies to enhance ongoing and future public engagement efforts.** Specifically, SCDOT aims to:

- Continue to focus on project websites as forums to share information and for participants to provide input;
- Incorporate digital storytelling tools and project walkthrough videos as part of VPI efforts;
- Continue outreach through social media;
- Use videoconferencing with a call-in line for an upcoming public hearing instead of relying solely on a call-in line;
- Consider using a text message alert service, a dedicated public involvement application, or a simpler, mobile-responsive webpage to publicize public involvement opportunities; and
- Research new strategies to help advance VPI efforts in the future.

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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/](https://www.fhwa.dot.gov/planning/public_involvement/vpi/)

For more information on the NEPA public hearing requirements refer to the following website:  
[https://www.environment.fhwa.dot.gov/nepa/trans\\_decisionmaking.aspx](https://www.environment.fhwa.dot.gov/nepa/trans_decisionmaking.aspx)

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