

Inclusion of Virtual Public Involvement (VPI) in Michigan Department of Transportation's Public Involvement Procedures

MDOT's Public Involvement Procedures for Federal-aid Project Development satisfies Federal Highway Administration's (FHWA) public involvement requirements under 23 U.S.C. 128 and 139, 23 CFR 771.111(h), and procedures implementing the [National Environmental Policy Act of 1969](#) (NEPA). This document provides guidance for incorporating virtual public involvement (VPI) into the project development process in a manner that supplements compliance with all federal public involvement requirements.

Incorporating VPI into a project's public involvement plan

A project-specific public involvement plan would have initially defined the purpose of the public involvement and engagement goals. These purpose and goals drive the choice of VPI tools, not vice versa.

- What are the communication and outreach goals for the project?
- Do you need to communicate information about the status of the project without taking comments?
- Is this an opportunity for people to weigh in on a pending decision?
- What are the communication needs of residents, commuters, and stakeholders in the study area?

Consider using multiple VPI methods that are commonly used in the study area, such as websites, social media, and e-mail blasts. For example, share the recording of a virtual meeting on a local municipal webpage and YouTube. Share information with community groups that can post updates to the project website and social media channels. Request and collect contact information to follow up on comments received.

VPI can provide tools for additional opportunities for feedback on project proposals, but the tools for obtaining input may differ based upon the level of detail sought from stakeholders and the public. Some VPI tools require more preparation time than others.

VPI also should be based upon an understanding of the target audience. Plan to be inclusive. Conceptualize the public as a collection of discrete groups, individuals, and the general public. Each has different interests and participation levels. Public involvement should reach the general public and those directly affected by a proposed action, including those living or working adjacent to the project limits, nonmotorized users, commuters and public transit users. Questions to help identify and reach the affected population include: What are the demographic characteristics of the targeted audience? Are there underserved, Environmental Justice (EJ) or Title VI population and/or communities? If so, what barriers exist and what can be done to proactively engage them through traditional and virtual public involvement strategies? Do they have access to the Internet? If so, are they likely to use it? If not, employ other methods of communicating and obtaining input in addition to VPI. Also consider the number of people who may participate in VPI to make sure the technology has adequate capacity.

VPI should include wide-reaching advertisements and announcements to capture all potentially impacted parties, not just those living adjacent to the project limits. Use VPI to reach others who may be indirectly impacted, such as commuters and those who may be impacted by changes in public transit.

Public Involvement Goals Utilizing VPI

Public involvement for NEPA should:

Coordinate activities and virtual meetings with the entire NEPA process, especially for more complex projects. For example, consider whether you need input on project purpose and need, alternatives, the recommended solution, or mitigation. Even a Categorical Exclusion can include some of these decision points, especially if you need information to make design decisions based upon community input. For example, if you already have a virtual project meeting scheduled to explain your alternatives analysis, include information about de minimis impacts and request input as part of the event.

- Provide early and continuing opportunities during project development for the public to be involved in the identification of social, economic, and environmental impacts, as well as impacts associated with real estate activities, including temporary consents to grade and the relocation of individuals or businesses.
- Provide public outreach for proposed operational improvements such as road diets, roundabouts, and the installation of active traffic management systems. Permanently removing a vehicular or pedestrian bridge also requires outreach, as does any potentially significant change in access to transportation, regardless of the mode. YouTube videos of roundabouts and diverging diamond interchanges can be embedded in virtual presentations so the public can gain a better understanding of the proposed project.
- Include documentation of outreach activities. Virtual public involvement tools often have recording options to assist with documentation needs. Keep a record of all public comment and response, as well as a record of all VPI tools and strategies utilized on the project.

Facilitating Virtual Meetings and Online Public Comments

Virtual public meetings may be held in a Microsoft Teams Live Event with the option to share the broadcast on YouTube and MDOT's Livestream channel. The public can participate directly in a Microsoft Teams Live Event using the Internet or the Microsoft Teams app. The Microsoft Teams Live Event platform allows facilitators to review comments prior to publishing them in the virtual meeting. The Department of Technology, Management and Budget (DTMB) provides directions and information on how to facilitate public comment in Microsoft Teams Live Events at

https://www.michigan.gov/documents/dtmb/Produce_and_Present_at_a_Teams_Live_Event_684211_7.pdf

under the "Moderating Q&A" section. Microsoft Teams Meetings are currently being trialed as a platform for public meetings. Many of the processes for facilitating Teams Live Events are applicable to Teams Meetings.

For YouTube and MDOT's Livestream channels, project staff need to closely monitor comments to ensure the meeting presenters address the comments during the meeting or note that they will provide an answer later. The State of Michigan (SOM) [Social Media Community Guidelines](#) identify the type of content not permitted on social media sites, including YouTube and Livestream events. Teams facilitators can use this guidance to address comments that are threatening, discriminatory or vulgar.

Team facilitators can limit the public comment timeframe to 15 - 60 minutes, stating that any comments not addressed during the meeting will be handled within the next three to six business days. The comments document can be shared in a news release, on social media, e-mailed to distribution lists, posted on project websites (if available), or shared on Mi Drive. The facilitators can determine the amount of time for public comments based upon the potential for controversy (more time) and by the size and complexity of the proposed project.

How to Manage Chat and Public Comments in Teams Live Events

- Public comments first appear in the “New” tab of the chat. MDOT staff then move the comment to the public side of the chat by selecting the “Publish” option.
- Assign staff to read comments aloud with their camera on and to share them in the chat function of the Microsoft Teams Live Event.
- Project staff can follow the SOM social media guidelines when reading comments from a chat box. Comments not related to the topic at hand will be shared with the appropriate MDOT staff.
- Virtual meeting communications should also include time frames for accepting comment, such as one week or two weeks, or 30 days, for example.
- Comments should be documented for the NEPA file along with responses.
- Consider creating an FAQ document to provide information on frequent questions or concerns.

Selecting VPI Tools

Consider the needs of residents, commuters, and stakeholders when selecting VPI tools. Use familiar channels to let people know about the opportunity for public comment and how to receive and review information. If possible, collect or request contact information and follow up on comments or questions received. Review the Underserved Populations section of this document prior to developing a VPI plan.

VPI Tool	Description	Selection Criteria	*Asynchronous or Synchronous	**Cost
Project Website	The project website should be the hub for public involvement. Many tools listed below can be added to the project website, clearly communicating the pathways for public engagement.	Update and inform large groups and individuals. Repository of all project information.	Asynchronous	No cost
Webinars and Virtual Meetings	Virtual meetings can be coordinated and streamed live with Microsoft Teams Live. Attendees can join by computer, telephone, or the Teams phone app. The meeting recording can be added to the project website and MDOT YouTube channel and shared on social media. Closed captioning must be used.	Update and inform large groups and individuals.	Synchronous	No Cost
Fillable Comment Form	This is a Word or PDF document with several options for submission. It can be e-mailed or printed and mailed. It can contain open-ended survey questions.	Offers a structure for comments and questions. Can be used to develop a project contact list while obtaining input.	Asynchronous	No cost

	SurveyMonkey or a Microsoft Form can also be used. Can also place on a web page.	Can be used as basis for Q&A document or website.		
Narrated PowerPoint	This is a great tool for sharing project updates. The PowerPoint can be saved as a video and added to the project website; availability of the video can be communicated through social media and shared in a news release.	Project and construction updates.	Asynchronous	No cost
YouTube	MDOT has a YouTube channel where a meeting can be livestreamed or posted on the web for later viewing.	Comments can be turned on or off; if turned on, then must respond either live during the event or later if posted on the web.	Asynchronous	No cost
Online Surveys for Title VI	Surveys are useful for collecting Title VI data and can be incorporated into virtual meetings.	Must be used at all virtual public meetings. Share a link in the announcements section of public meetings.	Asynchronous	No cost
MetroQuest Surveys	MetroQuest or similar tools are excellent for public engagement.	Use with statewide or large projects. Great for reaching commuters and younger age groups on purpose and need and alternatives selection.	Asynchronous	High cost
Telephone Townhall	Telephone townhalls work well when Internet access is limited or when trying to engage people who do not use the Internet. Cost for these services vary.	Alternative to Microsoft Teams. Public can register in advance and only need a telephone to participate. Meeting materials and transcripts are available.	Synchronous	Moderate cost
Social Media	Use in coordination with other strategies.	Share meeting notices in advance and day-of on social media channels. Useful for quick and immediate information sharing.	Asynchronous	No cost for posting. Social media ads can be purchased.
Public Access Cable TV	Meeting recordings and/or narrated PowerPoints can be broadcast.	Great companion strategy used in coordination with other tools. Internet connection is not needed.	Asynchronous	No cost to moderate cost
Drive-In Meetings	Identify a location with strong Wi-Fi and designate it as a place for people to park and log into a virtual meeting. This strategy can	Excellent alternative to virtual meetings in areas with limited Internet access.	Synchronous	Moderate cost

	be used to distribute information and for in-person meetings if sound and presentation equipment is available.			
	<p>*Note: Synchronous VPI allows for a dialogue between individuals on either side of the virtual connection whereas asynchronous VPI is passive communication where an individual connects and is limited either to reading or seeing information and/or posting a comment versus asking a question or making a comment and having it responded to in real time. Asynchronous does not allow direct dialogue.</p> <p>** low cost: \$1 - \$500, moderate cost: \$501 - \$1,000, high cost: more than \$1,000</p> <p>For additional information on VPI tools visit: https://www.fhwa.dot.gov/planning/public_involvement/vpi/</p>			

Companion Strategies for VPI

The public and stakeholders can submit written comments via mail or scanned in and e-mailed. An MDOT mailing address should be listed on websites, news releases, social media, and comment forms. An in-person meeting can be held in coordination with a virtual public meeting, either simultaneously or on different dates. Holding the meetings on separate dates provides the public with two opportunities and can limit in-person attendance, which may be necessary if there are executive orders or Centers for Disease Control and Prevention (CDC) guidelines limiting in-person gatherings. If an in-person meeting or hearing is held, describe the safety protocols that will be in place. Repositories such as libraries and travel service centers may not be available to the public during public health emergencies. Offer to mail a hard copy, e-mail, or mail a storage device with digital documents if the public cannot access the document(s) online.

Underserved Communities

VPI tools must reach the underserved people and communities that will be affected by a given program or project. Strategies for reaching underserved communities include:

- Partnering with community organizations to disseminate information. For example, local food banks could include a project flyer with a comment form when they distribute food or other items. Community organizations can share communications in newsletters, social media and on websites.
- Making virtual meeting transcripts and presentations available by mail. In news releases, include a statement that provides direction to obtain the materials. Example: “Copies of the meeting transcript and presentation are available by mail. Call (phone number) or e-mail (e-mail address@Michigan.gov) to request a copy.”
- In areas with poor Internet and broadband service and/or use, develop a multi-faceted strategy that uses mailings, community organizations, social media, and telephone outreach.
- Determine if documents and presentations need translation in advance of their release. Use the EPA’s EJ Screen mapping tool’s language filter to determine needs: <https://www.epa.gov/ejscreen>.

Americans with Disabilities Act (ADA) Compliance

ADA requires agencies to provide information on how to request reasonable accommodations on all postings:

“Accommodations can be made for persons with disabilities and limited English-speaking ability. Large print materials, auxiliary aids or the services of interpreters, signers, or readers are available upon request. Please contact Orlando T. Curry, 425 W. Ottawa, Lansing, MI 48909, Phone: 517-241-7462, Fax: 517-335-0945, TTY: 844-578-6563, CurryO@Michigan.gov to request at least seven days prior to the event.”

Closed captioning should be used in all virtual meetings. Microsoft Teams Live is available to MDOT and can be used for virtual public meetings. To use live captions in Teams Live, go to meeting controls and select “More Options > Turn on live captions.” Be sure to speak clearly, slowly, and directly in the microphone.

The goal is to find a practical solution fitting the circumstances, taking into consideration the nature, length, and complexity of the communication as well as the person’s normal method(s) of communication. Sometimes a practice that seems neutral makes it difficult or impossible for a person with a disability to participate. In these cases, the ADA requires public entities to make “reasonable modifications” in their usual ways of doing things when necessary to accommodate people who have disabilities: ada.gov. The State of Michigan has ADA guidance for developing meeting materials posted on the Inside Michigan page at <https://stateofmichigan.sharepoint.com/teams/insidemi/digital/ada/Pages/Accessibility-How-To.aspx>.

Title VI Compliance

The purpose of Title VI is to ensure all persons who may be interested in attending or participating are able to do so regardless of race, color, or national origin. For virtual meetings, MDOT has an online survey form to collect Title VI information on race, age, gender and is used for reporting purposes to FHWA.

Environmental Justice

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.

To determine the audience to address, reach out to Environmental Services Section (ESS) staff. Communicate with local governments and community organizations such as churches and food banks using virtual and traditional channels. These organizations are normally in touch with the community’s most vulnerable. Provide them with project information, giving them a chance to share it through their social media accounts, websites, or newsletters.

Roles and Responsibilities

Public Engagement Strategy	VPI Component	Point Person	Additional MDOT staff coordination
Citizen Advisory Committee	Microsoft Teams	Project Manager	Region Planner, Public Involvement Specialist
Electronic Updates	MDOT web page, e-mail	Project Manager	Region and Lansing Communications
Fact Sheets	MDOT web page, e-mail	Project Manager	Region and Lansing Communications
Social Media	Facebook, Twitter	Region Communications	Project Team
Project Newsletter	MDOT web page, e-mail	Project Manager	Region Planner, Public Involvement Specialist, Region Communication

News Release	MDOT web page, e-mail	Region Communications	Project Team
Public Meetings	Microsoft Teams, surveys, YouTube, ARC-GIS movie, PowerPoint, brochure	Project Manager	Project Team, such as Region Planner, Region Communications, Lansing ESS specialists
Public Hearing (Note, VPI alone not allowed by FHWA at this time)	Microsoft Teams, Drive-in events, U-Tube, ARC-GIS movie, PowerPoint, brochure, news release, legal notice in newspapers	Project Manager and Public Involvement Specialist	Project Team