

# Public Involvement to Support Planning and Environment Linkages in Rural and Small Metropolitan Areas



Prepared by the National Association of Development Organizations (NADO) Research Foundation for the U.S. Department of Transportation, Federal Highway Administration

Draft Final | June 2022

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This report was primarily authored by NADO Associate Director Carrie Kissel with research assistance from Senior Program Managers Rachel Beyerle and Ciara Ristig. Thank you to the all the agencies that provided information and images for this report. This work is supported by the Federal Highway Administration (FHWA) under contract number 693JJ321P000004. Any opinions, findings and conclusions, or recommendations expressed in this publication are those of the authors and do not necessarily reflect the views of FHWA or the NADO Research Foundation.

Cover image: Southern Tier Central Regional Planning and Development Board

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*The public includes anyone who resides, works, has an interest in, or does business in a given area potentially affected by transportation decisions, including organized groups. The public is a rich source of ideas, full of people who can contribute to improving their transportation systems. Community members intimately know their region's transportation issues and challenges and are invested in seeing short- and long-term improvements come to fruition.*  
—Public Involvement Techniques for Transportation Decisionmaking, FHWA 2015

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## Introduction

Federal surface transportation legislation has long required transportation agencies to conduct public involvement throughout the transportation planning process. From developing high-level themes and policies in long-range transportation plans, to prioritizing projects in capital programming, to corridor plans or studies that focus on a specific area, the public must have the opportunity to participate and shape decision-making. Agencies typically develop a plan for engaging the public, including describing the ways in which they engage the public and how they respond to that information. Incorporating public input early and often throughout planning, environmental review, and project development can provide many benefits and new ideas to local governments, Tribes, Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Organizations (often called RTPOs or RPOs), transit agencies, State Departments of Transportation (DOTs), and their private sector partners.

In addition, the National Environmental Protection Act (NEPA) also requires that the public have an opportunity to participate in Federal agencies' environmental reviews. Enacted in 1969, NEPA acknowledges that governmental actions can affect the environment. NEPA requires that Federal agencies consider environmental and related social and economic effects of proposed actions (including federally funded projects) and inform the public about decision making.<sup>1</sup>

Rather than collecting public information and conducting analysis on the same issues multiple times, linking the planning and environmental processes can result in several benefits. Beginning in 2005, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) released joint guidance encouraging transportation agencies to create stronger linkages between the planning and NEPA processes. Although conducting Planning and Environment Linkages (PEL) is optional and does not require that agencies change their planning processes, the planning and environment connection was strengthened further in later regulation and statute.<sup>2</sup>

State, regional, and local agencies are responsible for conducting transportation planning activities, while the NEPA process is a responsibility of FHWA, FTA, and other Federal agencies that fund projects and manage resources. When information from planning is incorporated into the environmental review process, the federal lead agencies must ensure that the plans were developed following the federal transportation planning process including public involvement, along with considering required planning factors and consulting with other agencies.<sup>3</sup>



*Area stakeholders mark significant locations on an aerial photo during a public meeting. Image from Middle Georgia Regional Commission.*

If transportation planning information, processes, and decisions are documented in enough detail to be accepted into the NEPA process, PEL can lead to a variety of potential benefits for states, regions, Tribes,

and local agencies. The Colorado DOT notes many possible benefits to linking the transportation planning and NEPA processes while ultimately improving project delivery. Some of these benefits include:<sup>4</sup>

- Building on decisions and information developed during the planning process in NEPA
- Developing a project’s preliminary purpose and need during long-range planning, which provides the foundation for the alternatives analysis (defining purpose and need and analyzing alternatives are required in the NEPA process)
- Identifying and engaging affected jurisdictions and transportation agencies early and often
- Building collaborative and trust-based working relationships with resource agencies, FHWA, state DOTs, local agencies, and the public by enhancing participation and coordination efforts, and developing agreements among agencies when applicable
- Considering environmental impacts early in the transportation planning process, which may help accelerate project delivery
- Improving information quality and identifying key environmental resources; this can lead to considering a range of alternatives that might avoid or minimize impacts, or might require environmental clearance processes that could affect implementation schedule and budget
- Recommending an action plan with future projects

It is still important that a detailed analysis of environmental, social, and economic impacts occurs in the NEPA process before projects that change the landscape of a community are implemented. As Colorado DOT notes, “[PEL] is not intended as a substitute for the NEPA process but as a way to streamline the NEPA process and focus project development.”<sup>5</sup> However, considering environmental impacts in the transportation planning process, whether through PEL studies or in all types of general plans, can provide important benefits for delivering projects and meeting community needs.

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*Early and strong public engagement has the potential to accelerate project delivery by helping identify and address public concerns early in the planning process, thereby reducing delays from previously unknown interests late in the project delivery process.*

*—FHWA, Every Day Counts: Virtual Public Involvement*

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## Transportation Planning Activities that Link to Environmental Consideration

State, regional, tribal, and local transportation entities often complete PEL studies that focus on proposed project areas. This can include a corridor or local area-focused study that engages the public as well as all relevant government agencies and Tribal governments.<sup>6</sup> It should also document information and decisions in ways that can be referenced in a NEPA document. This can include using language that is consistent with requirements in the NEPA process, such as “purpose and need” to describe the rationale for a project, and providing sufficiently detailed analysis of potential project alternatives and their impacts.<sup>7</sup>

Beyond PEL studies, transportation planning agencies can include elements of PEL in all their plans and studies. At the state level, DOTs complete long-range statewide transportation plans (LRSTPs) that are often policy plans that outline the system's needs and policies for investment strategies. States also develop Statewide Transportation Improvement Program (STIP) documents at least every four years identifying prioritized projects/project phases to be implemented over a four-year period. Similarly, at the metropolitan level, MPOs also develop metropolitan transportation plans (MTPs) with 20-year horizons and short-range Transportation Improvement Programs (TIPs) that identify prioritized projects/project phases.<sup>8</sup> In rural areas, the state must cooperate with local officials with responsibility for transportation in the development of the LRSTP and STIP.<sup>9</sup> To support a relationships across levels of government, many State DOTs also voluntarily adopt agreements with RTPOs and similar organizations to conduct non-metropolitan planning and support statewide planning. Tasks often include developing rural LRTPs and rural TIPs or project priority lists.<sup>10</sup> Tribes complete LRTPs (often in conjunction with State, MPOs or RTPOs, area non-tribal local governments, and other stakeholders) and Tribal transportation improvement programs.<sup>11</sup>

Local and Tribal governments often complete comprehensive plans that contain a transportation element (along with land use and other factors that affect how people travel). Local and Tribal governments also often complete capital improvement programs that identify specific projects for implementation. This may include projects within a community that use a combination of federal and local funds. Where there are regional plans completed by MPOs and RTPOs, those regional plans are typically intended to be consistent with the adopted local plans.<sup>12</sup>

All of these local, Tribal, regional, and statewide plans that are (or may be) completed in rural and small metro areas include outreach to the public. As a result, many types of planning processes offer opportunities for the public and stakeholder groups to identify and document potential environmental, social, and economic effects of proposed transportation investments, including projects that may be eligible for federal funds.

## WHAT ABOUT LOCAL OFFICIALS?

Anyone, including local elected and appointed officials, can take part in transportation agencies' public engagement in planning.

However, these officials often have responsibility for locally owned transportation assets. They also influence or control issues such as land use and economic development that affect demand across the whole transportation network.

Because of their responsibilities, local officials in urban areas participate in decision-making through their MPOs.

In rural areas, state DOTs must develop and follow a special consultation process. This ensures they communicate with and receive transportation planning input from local officials, separate from the public engagement process. This often includes working through RTPOs and similar agencies, as well as other consultation methods.

In the NEPA process, local agencies are typically participating agencies.

Sources: FHWA and FTA (2018), *The Transportation Planning Process Briefing Book*; Council on Environmental Quality (2021), *A Citizen's Guide to NEPA*

## Public Involvement in Transportation Planning

### Region 8 Languages Written, Read, Spoken

Language	Spoken	Written	Read	Communities / Agencies
Amharic*	X		X	Redwood County, Nobles County, Lyon County, SW PIC
Anuack	X			Worthington
Arabic*	X	X	X	Worthington & Nobles County (SMOC Head Start), Pipestone Area Schools (Iraqi)
Burmese	X			Worthington & Nobles County, smaller in Marshall & Lyon County, SW PIC
Dakota	X	X	X	Lower Sioux community
English	X	X	X	Region wide
Hmong	X		X	Walnut Grove, Tracy, Redwood Falls, Marshall, Lyon County & Redwood County, Marshall School District, Westbrook Walnut Grove School (WWG), Western Mental Health Center (WMHC)
Karen*	X	X	X	Marshall & Lyon County, Worthington & Nobles County, Marshall School District, SW PIC, Pipestone Area Schools
Karenese	X	X	X	WMHC
Kareni	X			Marshall / Worthington

*To increase the access of Native, immigrant, and refugee populations to transportation information and opportunities to participate, the Southwest Regional Development Commission created a Languages and Interpreter Services in Southwest Minnesota document to supplement the organization's public outreach. The document has information regarding 25 languages spoken across the rural region. Image from SRDC.*

State DOTs and MPOs must develop Public Involvement Plans and Public Participation Plans, respectively, that outline the ways in which they communicate with, gather feedback from, and respond to the public on transportation planning and decision-making matters.<sup>13</sup> In addition, RTPOs often develop their own involvement plan or set of procedures, as do local governments, transit agencies, Tribal governments, and other decision-makers.

At a high level, input from the public can help to determine a region's overall direction in a transportation plan's vision and goals by identifying characteristics in their community that they would like to preserve or grow over time. The public's input is important when developing the details of specific projects, as well as for more high-level goals. Ultimately, decisions about projects are where ideas about community character are implemented from a transportation standpoint, along with local decisions about land use, housing, transportation, and other types of investments that also affect how a community changes over time.

Transportation agencies should engage the public early and often to find out about diverse perspectives, interests, and concerns of residents and stakeholders in a project area. Public engagement often occurs through a variety of methods. These can include in-person meetings, such as hearings, charrettes, workshops, focus groups, and other formats. Surveys, questionnaires, comment boxes, and other tools are ways to gather input without the public needing to attend a meeting and can be submitted anonymously.<sup>14</sup>

The Mankato/North Mankato Area Planning Organization (MAPO) in Minnesota has conducted several corridor-specific studies for projects within the small urbanized area. One of these is the Warren Street Corridor Study, which identified potential multimodal alternatives that connect central Mankato with the Minnesota State University Campus.<sup>15</sup> The study team conducted a significant amount of in-person outreach. This included formal public open houses, presentations at apartment complexes where management hold regularly scheduled events with residents, university student senate outreach, city

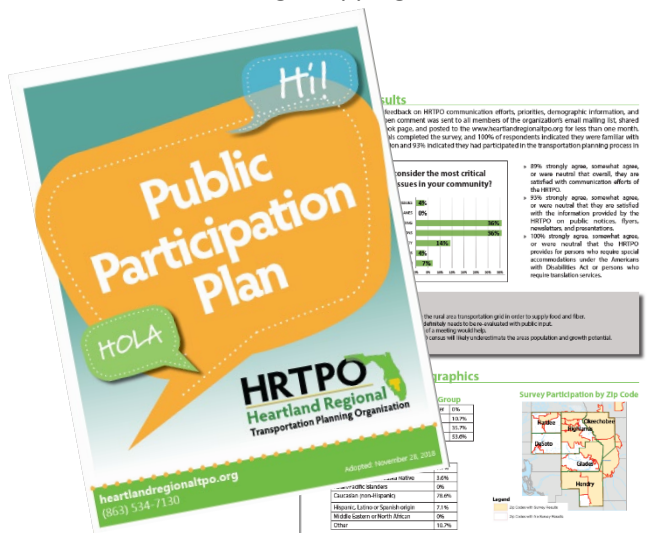
council outreach, conversations with transit drivers about their observations of the corridor, and pop-up events such as the Alive After 5 summer outdoor concert series. Staff received comment cards and took detailed notes at events to record conversations and concerns. These details were documented in the corridor study and appendices.<sup>16</sup>

Increasingly, agencies are incorporating virtual public involvement into their outreach methods. The 2021 Infrastructure Investment and Jobs Act (IIJA, also called the Bipartisan Infrastructure Law) encourages MPOs to use social media and web-based public engagement tools in the transportation planning process.<sup>17</sup> While some virtual tools require additional investment from an agency, many can be used in a low-cost way. Some tools also may offer efficiencies by building in documentation of each submitted comment, therefore allowing planning agencies to maintain and share detailed information about the extent of the outreach that they have conducted and the content of the comments received.

Some types of virtual public involvement include:

- *Mobile applications* that can serve as a clearinghouse of information about project or plan development and can allow users to share comments through text or photos that may be geotagged to a location.
- *Project visualizations* including photo simulations, 3D images, video animations, and other “mockups” of what a project could look like when implemented.
- *Do-It-Yourself videos* produced by transportation agency staff that can offer the public accessible content without costly production.
- *Crowdsourcing* that uses online and mobile tools to gather ideas and comments that other members of the public can assess or vote on.
- *Virtual town halls and virtual public meetings* that offer information sharing and interaction without requiring travel to a meeting location. They can also integrate live polling and captioning and translation services that can increase the accessibility to members of the public who benefit from those supports.
- *Mapping tools* that display complex spatial information, and many offer opportunities for users to share comments.
- *“All-in-one” tools*, which combine multiple virtual public involvement methods, such as crowdsourcing, mapping, visualization, and others.

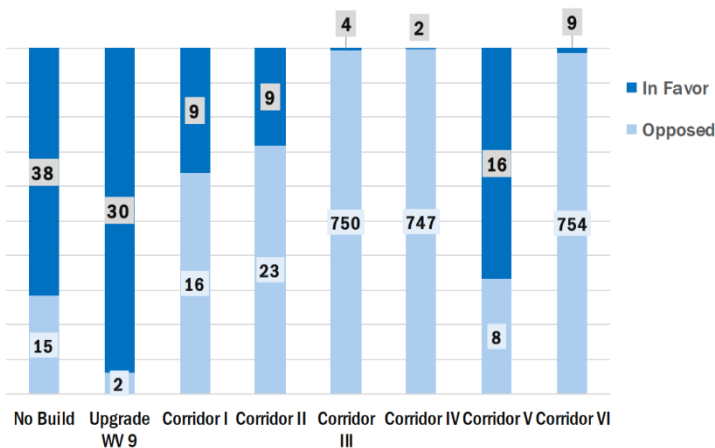
- *Digital tools that enhance in-person events* through live polling, using tablets or kiosks to collect and share information, and streaming in-person public meetings through social media.<sup>18</sup>



The Heartland Regional Transportation Planning Organization (staffed by the Central Florida Regional Planning Council) serves six counties including one urbanized area. HRTPO publishes its Public Participation Plan (left) that provides background on the transportation planning process and how the public can get involved. HRTPO also publishes a Public Involvement Report (right) that describes the feedback gathered. Images courtesy HRTPO/CFRPC.

State DOTs, Tribes, RTPOs, MPOs, and other agencies often use a combination of methods to reach out to the public. The *WV 9: Berkeley Springs to Martinsburg, WV, Planning and Environmental Linkages Study Report* was completed for the West Virginia DOT and Hagerstown/Eastern Panhandle MPO with consultant support.

Figure 9-1: March Public Comments Summary



Comments submitted during and after public virtual workshop indicated the view of the public regarding potential project alternatives. Image from WV DOT.

During the transportation planning process, the study team conducted a series of virtual stakeholder and public workshops. Each workshop had its own agenda to communicate to the public and gather feedback. An initial workshop for invited stakeholders was held to introduce the Study and identify study goals and objectives, planned development in the area, safety concerns and environmental resources, and preliminary alternative corridors. A final workshop for these same invited stakeholders reported back out to this group about the study's progress, preliminary findings, and next steps.<sup>19</sup>

In between these two stakeholder-specific events, the study team also held virtual workshops where targeted stakeholders were invited along with members of the general public. The input provided during the public workshops and a subsequent monthlong comment period allowed the study team to better understand how the public felt about the options for improving the corridor (no-build scenario, upgrade the existing route, or make alignment changes along six potential corridors).

The comments showed the public view regarding proposed project alternatives that are likely to affect an active farm that is also on the National Register of Historic Places. These findings from the workshop and comment period were supplemented through an online survey that garnered participation from over 3,000 individuals regarding their concerns and preferences.<sup>20</sup>



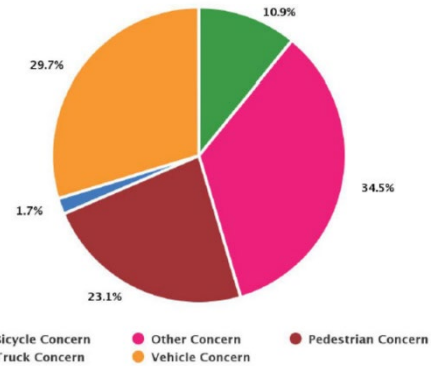
The Humboldt County Association of Governments (HCAOG) is a Regional Transportation Planning Agency in California that conducts rural regional planning. For countywide plans or corridor studies of smaller geographies, HCAOG also uses a variety of public engagement methods. For the Eureka Broadway Multimodal Corridor Plan, HCAOG used community workshops, a stakeholder focus group, a booth at the Eureka Farmers Market, and an online interactive mapping tool to gather additional public comments.<sup>21</sup>

The HCAOG has seen many benefits of conducting broad outreach in multiple communities and using multiple engagement methods. Hearing directly from the public can provide detailed feedback about needs and priorities. In some cases, the results of engagement can dispel assumptions that leaders or agency staff might have about community preferences. By going to partner organizations' meetings and listening to community members, HCAOG has gained a deeper understanding of the travel challenges experienced by residents.<sup>22</sup>

The Frontier Metropolitan Planning Organization (FMPO) serves as the regional transportation planning organization for the Fort Smith urbanized area in western Arkansas and eastern Oklahoma and is a program of the Western Arkansas Planning and Development District. The MPO uses a variety of engagement tools including online open houses and streamed meetings, local coffee chats and one-on-one meetings with interested agencies and parties. They also use social media and the Public Input platform, a software program that captures voice, text, and email comments, has an interactive map for surveys and can be used to develop surveys and reports.

For the FHWA Transportation Corridor Planning Framework and the Walkability Action Institute, FMPO also used a "citizen scientist" method called the Our Voice Approach, which allowed residents to provide input about walking, cycling, and access in their neighborhoods. The project viewed public input as data, and incorporated data from these citizen scientists using the Our Voice approach and Public Input platform.

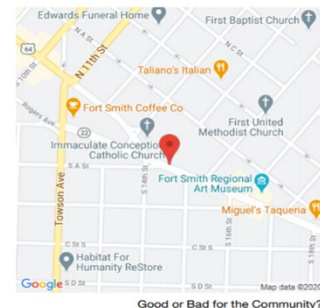
This broad outreach is crucial because, according to Reese Brewer, Frontier MPO Director, "as planners, we may live in the city, but not the same neighborhood or community. As a result, we can gain improved insights into what is really important to the community, not what we think is important. We gained trust; built relationships; and have a continued coordination and commitment to many agencies that we had not worked with in the past, from food banks to churches, to hospitals, to the Hispanic radio network."



Public comments left in the Eureka Broadway Multimodal Corridor Plan's online interactive tool were analyzed for the types of concerns mentioned. Image from HCAOG.

**Project : AWT**

November 22, 2020 8:27 am · pg 39/248



**Why did you take this picture?**

[text] : 'Narrow sidewalk, slopes downward. Cars zoom past you. The pole and sign take up space & could be a barrier or obstacle for those with walking aids & visual limitations.'

Feedback from residents indicated where transportation challenges are located and how they impact residents. Image from FMPO.

## Using Public Input from Planning in the NEPA Process

To provide maximum flexibility to include information from the transportation planning process in NEPA, FHWA encourages the use of PEL under the provisions of both 23 U.S.C. 139(f)(4)(E) and 23 U.S.C. 168 together, to the extent practicable. This preserves the option to use the planning products and decisions (such as purpose and need and elimination of unreasonable alternatives) in the environmental review process. Using the two statutory provisions together may maximize the potential benefits of PEL. However, flexibilities in PEL also allow the use of either approach alone. Other PEL authorities exist in regulations, including the FHWA/FTA Planning Regulation and Council on Environmental Quality NEPA Regulations.<sup>23</sup>

These approaches are meant to ensure flexibility and efficiency and still ensure that public input is a required part of the transportation planning process and NEPA.

If PEL is implemented following the provisions under 23 U.S.C. 168, there are ten conditions to consider that are related to public involvement to determine whether information from the transportation planning process can be adopted for NEPA. These conditions include:

- The planning product was developed through a planning process conducted pursuant to applicable Federal law.
- The planning product was developed in consultation with appropriate Federal and State resource agencies and Indian tribes.
- The planning process included broad multidisciplinary consideration of systems-level or corridor-wide transportation needs and potential effects, including effects on the human and natural environment.
- The planning process included public notice that the planning products produced in the planning process may be adopted during a subsequent environmental review process in accordance with this section.
- During the environmental review process, the relevant agency has—
  - made the planning documents available for public review and comment by members of the general public and Federal, State, local, and tribal governments that may have an interest in the proposed project;
  - provided notice of the intention of the relevant agency to adopt or incorporate by reference the planning product; and
  - considered any resulting comments.
- There is no significant new information or new circumstance that has a reasonable likelihood of affecting the continued validity or appropriateness of the planning product.
- The planning product has a rational basis and is based on reliable and reasonably current data and reasonable and scientifically acceptable methodologies.
- The planning product is documented in sufficient detail to support the decision or the results of the analysis and to meet requirements for use of the information in the environmental review process.
- The planning product is appropriate for adoption or incorporation by reference and use in the environmental review process for the project and is incorporated in accordance with, and is sufficient to meet the requirements of, the National Environmental Policy Act of 1969 (42 U.S.C.

4321 et seq.) and section 1502.21 of title 40, Code of Federal Regulations (as in effect on the date of enactment of the FAST Act).

- The planning product was approved within the 5-year period ending on the date on which the information is adopted or incorporated by reference.<sup>24</sup>



*Residents attend a planning open house held by the Central Florida Regional Planning Commission/Heartland Regional Transportation Planning Organization. Image from CFRPC.*

Rural, Tribal, and small metropolitan transportation organizations can take steps to ensure that their planning products are more likely to meet these conditions, if there are following 23 U.S.C. 168. Practitioner feedback gathered in 2021 found that rural and small metro agencies typically document that public involvement occurs. A section of these rural and small metro plans typically details the public engagement methods and tools that were used. Agencies also commonly keep records such as meeting minutes, sign-in logs, newspaper affidavits, and other primary sources.<sup>25</sup>

The lead agency may reduce duplication by eliminating alternatives from detailed consideration, if certain requirements are met (per 23 U.S.C. 139(f)(4)(e)(ii)):

- The alternative was considered in a metropolitan planning process or a State environmental review process by a metropolitan planning organization or a State or local transportation agency, as applicable;
- The lead agency provided guidance to the metropolitan planning organization or State or local transportation agency, as applicable, regarding analysis of alternatives in the metropolitan planning process or State environmental review process, including guidance on the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and any other Federal law necessary for approval of the project;
- The applicable metropolitan planning process or State environmental review process included an opportunity for public review and comment;
- The applicable metropolitan planning organization or State or local transportation agency rejected the alternative after considering public comments;
- The Federal lead agency independently reviewed the alternative evaluation approved by the applicable metropolitan planning organization or State or local transportation agency; and
- The Federal lead agency determined—
  - in consultation with Federal participating or cooperating agencies, that the alternative to be eliminated from consideration is not necessary for compliance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.); or
  - with the concurrence of Federal agencies with jurisdiction over a permit or approval required for a project, that the alternative to be eliminated from consideration is not necessary for any permit or approval under any other Federal law.<sup>26</sup>

However, regions may be able to do more to potentially enhance PEL. During transportation plan development, States, Tribes, RTPOs, MPOs, and others could choose to make a regular practice of notifying the public that their input may be used in environmental review as well as in developing the transportation plan, so that the planning information has utility in NEPA. From introductory remarks at public meetings to the invitation text to complete a survey, agencies can use simple and straightforward language to call out that feedback may be used in developing not only the transportation plan but also in later decisions, such as in the environmental review process.

Transportation plans often include summaries of the input and comments from area stakeholders that can be analyzed. This analysis can show where there are common themes, experiences of travel in the area, and where there may be some differing views on issues or locations. To keep transportation documents usable for the public, a short synthesis of public comments or some representative quotes can summarize the input. However, transportation plan appendices and supporting documentation can go into much more detail about individual comments received and how the organization responded. This level of documentation of the content and substance of public comments may help federal agencies to determine if there is enough detail to support incorporating the transportation plan into the NEPA process.

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*During the Egan Drive and Yandukin Intersection PEL study conducted in Juneau, the Alaska Department of Transportation and Public Facilities project team formed a 22-member community focus group and an 18-member agency workgroup. In-person and online public open houses offered opportunities to present information about the study and gather input. The agency asked for written comments during public comment periods, as well. For transparency about how the information will be used, the project website clearly says, “The resulting planning products may be adopted during a subsequent environmental review process.” For more information, visit <https://dot.alaska.gov/sereg/projects/egan-yandukin/>.*

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## Summary

Although the transportation planning process has a different purpose from the environmental review process, aligning the two can lead to efficiencies on project development and implementation. Since both transportation planning and NEPA processes require gathering and considering public input, linking the information gathered during the planning process through to environmental review can help to clarify a project’s purpose, reasonable alternatives, and potential impacts.

Bringing information collected in transportation planning through to the environmental process can help to reduce duplication and potential conflicts by identifying potential impacts earlier in the process. Similarly, agency staff involved in planning and environmental review within Federal, State, Tribal, regional, and local agencies often have significant responsibilities that must be completed with limited time and resources, so any efficiencies in linking planning and environmental review processes can benefit those participating agencies as well.

These agencies, situated in a variety of locations and at various levels of government, can choose to create shared methods for communicating with the public about how their input will be used, document public involvement opportunities and the content of the public's input in detail, and take other steps to enhance consideration of environmental impacts through PEL.

## Resources

Transportation practitioners and stakeholders can find more information in the following resources:

American Association of State Highway and Transportation Officials, Center for Environmental Excellence: <https://environment.transportation.org>

Colorado DOT (2016), Planning and Environmental Linkages Handbook, Version 2 (PDF): <https://www.codot.gov/programs/environmental/planning-env-link-program/pel-handbook-january-2016>

Council on Environmental Quality (2021), A Citizen's Guide to NEPA: Having Your Voice Heard (PDF): <https://www.energy.gov/sites/default/files/2021/01/f82/ceq-citizens-guide-to-nepa-2021.pdf>

FHWA, Planning Environment Linkages: [https://www.environment.fhwa.dot.gov/env\\_initiatives/PEL.aspx](https://www.environment.fhwa.dot.gov/env_initiatives/PEL.aspx)

FHWA, PEL Questionnaire: <https://www.fhwa.dot.gov/innovation/everydaycounts/edc-1/PEL-questionnaire.cfm>

FHWA, Public Involvement Techniques for Transportation Decision-Making, 2015 Update: [https://www.fhwa.dot.gov/planning/public\\_involvement/publications/pi\\_techniques/](https://www.fhwa.dot.gov/planning/public_involvement/publications/pi_techniques/)

FHWA, Virtual Public Involvement Resources: [https://www.fhwa.dot.gov/planning/public\\_involvement/vpi/](https://www.fhwa.dot.gov/planning/public_involvement/vpi/)

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<sup>1</sup> Council on Environmental Quality (2021), A Citizen's Guide to NEPA: Having Your Voice Heard, <https://www.energy.gov/sites/default/files/2021/01/f82/ceq-citizens-guide-to-nepa-2021.pdf>

<sup>2</sup> AASHTO (2008), Using the Transportation Planning Process to Support the NEPA Process, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Unit3\\_03AASHTO\\_handbook10-1.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Unit3_03AASHTO_handbook10-1.pdf)

<sup>3</sup> AASHTO (2008), Using the Transportation Planning Process to Support the NEPA Process

<sup>4</sup> Colorado DOT (2016), PEL Handbook, <https://www.codot.gov/programs/environmental/planning-env-link-program/pel-handbook-january-2016/view>

<sup>5</sup> Colorado DOT (2016), PEL Handbook

<sup>6</sup> FHWA (2016), "Planning and Environment Linkages," <https://www.fhwa.dot.gov/innovation/everydaycounts/edc-1/pel.cfm>

<sup>7</sup> FHWA (2011), Planning and Environment Linkages Questionnaire, <https://www.fhwa.dot.gov/innovation/everydaycounts/edc-1/PEL-questionnaire.cfm>

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- <sup>8</sup> FHWA and FTA (2018), The Transportation Planning Process Briefing Book: Key Issues for Transportation Decisionmakers, Officials, and Staff, [https://www.fhwa.dot.gov/planning/publications/briefing\\_book/#toc22294539](https://www.fhwa.dot.gov/planning/publications/briefing_book/#toc22294539)
- <sup>9</sup> 23 U.S.C. 135, <https://www.law.cornell.edu/uscode/text/23/135>
- <sup>10</sup> NADO RF (2016), Regional Rural Transportation Planning: State Models for Local Consultation, Regional Coordination, and Regional Transportation Planning Organizations, <https://ruraltransportation.org/regional-rural-transportation-planning-state-models-for-local-consultation-regional-coordination-and-regional-transportation-planning-organizations/>
- <sup>11</sup> FHWA (2022) Tribal Transportation Program Planning, <https://highways.dot.gov/federal-lands/programs-tribal/planning>
- <sup>12</sup> NADO RF (2016), Regional Rural Transportation Planning: State Models for Local Consultation, Regional Coordination, and Regional Transportation Planning Organizations
- <sup>13</sup> FHWA (2015), Public Involvement Techniques for Transportation Decisionmaking, [https://www.fhwa.dot.gov/planning/public\\_involvement/publications/pi\\_techniques/page00.cfm](https://www.fhwa.dot.gov/planning/public_involvement/publications/pi_techniques/page00.cfm)
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- <sup>15</sup> Mankato/North Mankato Area Planning Organization (2020), Warren Street Corridor Study: Study Report, [https://mnmapo.files.wordpress.com/2020/09/final\\_warren-street-study-report.pdf](https://mnmapo.files.wordpress.com/2020/09/final_warren-street-study-report.pdf)
- <sup>16</sup> Personal communication with Shawn Schloesser and Charles Androsky, MAPO, January 2022
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- <sup>22</sup> Beth Burks, HCAOG executive director, webinar presentation on 4/5/2022
- <sup>23</sup> Lana Lau, FHWA environmental protection specialist, webinar presentation on 4/5/2022 with reference to 23 U.S.C. 168; 23 U.S.C. 139(f)(4)(E)(ii); 23 CFR 450.212(a)-(c) and 23 CFR 450.318 (a)-(d); and 40 CFR 1500.4(l) and 40 CFR 1501.12; 23 USC 169; 23 CFR 450 214 and 320
- <sup>24</sup> 23 U.S.C. 168(d), <https://www.law.cornell.edu/uscode/text/23/168>
- <sup>25</sup> NADO RF (2021), Regional Approaches to Environmental and Transportation Planning: NADO Questionnaire Results, <https://ruraltransportation.org/regional-approaches-to-environment-and-transportation-planning-nado-questionnaire-results/>
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