

“How To” Guidance for Submitting Comments on an Environmental Document

MnDOT is committed to offering the public and local government agencies multiple opportunities to provide comments on proposed projects throughout the environmental process. These may include submitting comments at a public hearing, public meeting, open house, and during a formal comment period for an environmental document.

As part of the National Environmental Policy Act (NEPA), there are two opportunities for the public to provide formal comments. The first is during scoping for an Environmental Impact Statement (EIS), and the second is when a Draft EIS or an Environmental Assessment (EA) is published for public review and comment. Submitting a comment during these comment periods is one method of providing valuable input to the environmental review process. The Minnesota Environmental Policy Act also requires providing EISs and Environmental Assessment Worksheets (EAW) for public comment.



When submitting a comment, make sure it is submitted to MnDOT during the published comment period. However, MnDOT will consider written substantive comments received prior to publication of the decision document to the extent practicable. Comments can be submitted by mail, email, orally at a public hearing, or other methods provided by MnDOT.

Document	Comment Period ¹	Locations for Notice of Comment Period	Purpose of Comments
Scoping for an EIS	30 calendar days	Notice of Intent in <i>Federal Register (FR)</i> , Notice of Availability (NOA) in <i>EQB Monitor</i> , public meeting notice, project website	Comment on range of issues to be addressed through analyses, development of alternatives and provide recommendations to MnDOT
Draft EIS	45 calendar days	NOA in <i>FR</i> , <i>EQB Monitor</i> , local newspaper, and project website, legal notice for public hearing	Comment on purpose and need, alternatives analysis, impacts analysis, and proposed mitigation
EA/EAW	30 calendar days	NOA in <i>EQB Monitor</i> , local newspaper and project website, legal notice for public hearing	Comment on purpose and need, alternatives analysis, impacts analysis, and proposed mitigation
Other Documents	30 calendar days	Project website	Provide comments on topics, such as purpose and need statement; evaluation criteria; alternatives evaluation; design concepts

¹Timeframes listed are typical for type of document, however these may be extended by FHWA with good cause.

Developing a “Substantive” Comment

Carefully crafting a comment letter to include “substantive” issues is valuable to the NEPA process. All substantive comments submitted during the comment period will be considered and responded to with the final environmental document and used as part of the NEPA decision-making process. Providing a substantive comment also applies to providing oral comments during a public hearing.

What is a “substantive” comment?

The term “substantive” is not defined under NEPA or FHWA regulations. Therefore, FHWA and MnDOT follow guidance that a comment is considered substantive if it raises specific issues or concerns regarding the proposed project or the process and includes a reason for the issue. Substantive comments explain why the issue raised is important to the consideration of environmental, economic and employment impacts and alternatives. Examples may address the adequacy of transportation problems considered and/or of the analysis, suggest new alternatives, raise concern over new impacts not addressed, or question the accuracy of information.

What is a “non-substantive” comment?

A comment is not considered substantive if it is a general statement of support for or opposition to the project, a statement solely of preference, is not relevant to the topics in the document, or does not provide the reason for the issue or concern.

Writing a “substantive” comment

A substantive comment should be written to be solution-oriented and provide specific examples of issues within the environmental document. To begin, organize your comment to be clear and concise, focus on specific issues and provide as much factual support to substantiate your issue as possible. Substantiating the issue(s) through proposing specific changes, where possible, and describing data sources and/or alternative methodologies further supports development of a substantive comment. Include specific references to the document you are commenting on, such as the page number and section.

During scoping, comments that contribute to developing alternatives that address the purpose and need for the action are effective. Comments on a draft EIS, EA or EAW should avoid generalized statements such as the proposed project will have “significant environmental effects” or “I don’t support this project.” Substantive comments provide a reason for the issue raised, suggest possible solutions to address concerns and request additional analysis or consideration of mitigation measures. Other comments that can be valuable include: listing inaccuracies; identifying flaws in analysis methodology; showing potential environmental impacts that are not identified or adequately addressed; and suggesting additional possible mitigation measures.

For More Guidance:

[CEQ A Citizen’s Guide to NEPA Having Your Voice Heard](#)

**A Citizen’s Guide to
NEPA**
Having Your Voice Heard



[EQB A Citizen’s Guide: Commenting on Environmental Review Projects](#)

