PART 2, CHAPTER 1

PROJECT DESCRIPTION AND PURPOSE AND NEED

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PART 2 CHAPTER 1

PROJECT DESCRIPTION AND PURPOSE AND NEED

1.1 OVERVIEW

Pursuant to ***23 United States Code (U.S.C.) § 327*** and the implementing Memorandum of Understanding (MOU) executed on December 14, 2016, the Florida Department of Transportation (FDOT) has assumed and Federal Highway Administration (FHWA) has assigned its responsibilities under the ***National Environmental Policy Act (NEPA)*** for highway projects on the State Highway System (SHS) and Local Agency Program (LAP) projects off the SHS (***NEPA*** Assignment). In general, FDOT's assumption includes all highway projects in Florida which source of federal funding comes from FHWA or which constitute a federal action through FHWA. ***NEPA*** Assignment includes responsibility for environmental review, interagency consultation and other activities pertaining to the review or approval of ***NEPA*** actions. Consistent with law and the MOU, FDOT will be the Lead Federal Agency for highway projects with approval authority resting in the Office of Environmental Management (OEM).

This chapter provides guidance on developing and documenting the project description and purpose and need for the project prior to and during the Project Development and Environment (PD&E) phase. The project description briefly describes the existing facility or existing conditions, project limits, project location, and the proposed improvements so that the Lead Federal Agency, resource agencies, and the public can understand the scope of the project and its effects on the environment. The purpose and need for a project is a basis for the development of the range of reasonable alternatives required in an Environmental Impact Statement (EIS), or identification of the build alternative(s) for other Classes of Action (COAs). Moreover, the purpose and need for the project assists the Lead Federal Agency in evaluating project alternatives and selecting a preferred alternative (see ***Part 2, Chapter 3, Engineering Analysis***).

The purpose and need in an Environmental Document is where the planning process and the PD&E process (***NEPA*** for federal projects) most clearly intersect. The development of the purpose and need begins early in the planning process and evolves into the final purpose and need in the PD&E Study. FDOT and planning agencies [e.g., Metropolitan Planning Organizations (MPO) and Transportation Planning Organizations (TPO)] identify transportation needs during the development of their respective transportation plans based on planning data.

FDOT uses the Efficient Transportation Decision Making (ETDM) process to obtain input from resource agencies and the public on the purpose and need for projects that are screened through the Environmental Screening Tool (EST).

The purpose and need discussion in the Environmental Document provides details about the objectives of the proposed action, such as achieving transportation-related needs identified in an MPO plan. If project alternatives do not fully address the stated purpose and need, they can be eliminated from further consideration with documentation.

Further guidance regarding the development of the purpose and need can be found in ***FHWA Technical Advisory T6640.8A***, and ***FHWA Environmental Review Toolkit***.

1.2 PROCEDURE

1.2.1 Defining the Project

Prior to the PD&E Study, a description of the project is developed through the planning process and documented during the ETDM process. The project description used in the PD&E Study should be similar to the one used in the ETDM process. When developing a transportation project, the logical termini are determined for the scope of both transportation improvements and environmental analysis.

1.2.1.1 Development of Project Description

The project description must be written to allow a person without prior knowledge of the project to clearly understand what the project is. The project description must include the following information:

1. A brief description of the existing facility;
2. The limits of the proposed project (such as its length and logical termini);
3. The names of the City and County where the project is located; and
4. A brief description of the proposed improvements (such as mode, typical section features, facility type, multi-modal features, and any major structures).
5. A brief description of pedestrian and bicycle accommodation
6. Navigational needs, for federally-aided or assisted projects involving bridges over waters

A project location map illustrating the project limits. The map should display any landmarks mentioned in describing the proposed project or action (i.e., cities, towns, rivers, airports). The EST can be used to generate this map for screened projects.

An example of a project description is provided below:

> This project involves a 3.1 mile segment of SR-XX extending north from SR-YY to SR-ZZ (Figure 1) located in City X, County Y. The proposed project improves the existing two-way, two lane roadway to a four (4) lane, divided roadway with a raised

or restrictive median, and six-foot sidewalks and seven-foot bicycle lanes in both directions. Additionally, the project widens the bridge over Any Drainage District Canal which is a navigable channel.

1.2.1.1.1 Logical Termini

The establishment of a project's logical termini is an important aspect of the proposed project and serves to define the study area. The identification of logical termini should be completed during the planning process and finalized through the ETDM screening. For federal projects, the determination of logical termini is coordinated with the OEM during the Programming Screen when the purpose and need is accepted.

Logical termini are defined as the rational beginning and end points for a transportation project and serve as the basis for the area of potential effect for environmental issues/resources to be evaluated during the PD&E Study. They are often located at major traffic generators, such as an intersecting roadways. In most cases traffic generators determine the size and type of facility being proposed. The PD&E Study area generally covers a broader geographic area than the limits of the transportation improvements to ensure consideration of potential project impacts. Pursuant to ***23 Code of Federal Regulations (CFR) § 771.111(f)***, alternatives developed for EISs and Environmental Assessments (EAs) shall:

1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope.

2. Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made.

3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Consideration of the items above will prevent the problem of "segmentation" which may occur when a transportation need extends throughout an entire corridor but environmental issues and transportation needs are inappropriately discussed for only a segment of the corridor.

When describing the logical termini, it is common to describe the termini points broadly, such as "the intersection at SR-XX." However, termini that may not be considered logical without further discussion are county lines, rivers, and city limits.

The logical termini presented in an Environmental Document should be consistent with the "project limits" identified in the adopted cost feasible Long Range Transportation Plan (LRTP) of the respective MPO/TPO or other planning documents in a non-MPO area. The logical termini for a project in a "Non-attainment" or "Maintenance" area for Air Quality need to be consistent with the project limits established by the MPO/TPO. Any

inconsistencies need to be resolved in coordination with FDOT's District Planning Office, the MPO/TPO, and OEM.

1.2.2 Purpose and Need

The purpose and need for a project provides the basis for developing, considering, evaluating, and eliminating alternatives. The purpose and need shapes the alternatives and in the case of an EIS assists with identification of reasonable and feasible alternatives.

The purpose and need should be clearly written in plain language, succinct and well defined to set the framework for the development and evaluation of alternatives. The purpose and need should briefly describe the project context including actions taken to date, other agencies and governmental units involved, actions pending, and schedules. In many cases the project purpose and need can be adequately explained in one or two paragraphs.

Project needs developed during the transportation planning process and identified in a statewide or metropolitan transportation plan can be the primary source of a project's purpose and need. The transportation planning process enables state and local governments and MPOs, with the involvement of resource agencies and the public, to establish a vision for a region's future transportation system, define a region's transportation goals and objectives for realizing that vision, decide which needs to address, and determine the timeframe for addressing these needs. Out of the process emerge proposed projects intended to meet the needs and achieve the objectives of the plan.

The initial purpose and need developed during the Planning phase or ETDM screening may be refined during the PD&E Study if new information or needs are identified. If the purpose and need changes during the PD&E Study, the OEM must be made aware of and agree to the proposed changes before they can be incorporated into the Environmental Document.

1.2.2.1 Development of Purpose and Need

Transportation planning data developed for FDOT in non-MPO areas or for MPO/TPO LRTPs are the primary source of information used to establish the purpose and need. These data are obtained from corridor plans, subarea plans, regional models and other sources that help identify corridors and facilities where transportation improvements are needed. These data are also summarized in the Strategic Intermodal System (SIS) plan, MPO/TPO Transportation Improvement Program (TIP), and the State Transportation Improvement Program (STIP). District staff preparing the purpose and need during ETDM screening should coordinate with planning staff to obtain relevant data that support the purpose need for the project. Consistent with the conditions set forth in ***23 CFR Part 450*** and ***23 U.S.C. § 168*** planning products can be adopted or incorporated by reference into ***NEPA***.

1.2.2.1.1 Purpose

The purpose identifies the primary goals of the project and guides the alternatives that will be considered and developed in response to the established need. The purpose should be broad enough to encompass a reasonable range of alternatives for an EIS, but not so broad that it encompasses every possible alternative. Conversely, the purpose should not be so narrow as to preclude a range of alternatives that could reasonably meet the defined objectives or restrict decision-makers' flexibility in resolving conflicting interests.

An alternative that does not achieve the primary purpose of the project would be eliminated as unreasonable or not feasible. Secondary purposes do not, by themselves, provide a basis for eliminating alternatives from further study, but could be considered in the selection of a preferred alternative.

1.2.2.1.2 Need

The need for the project arises from deficiencies, issues, and/or concerns that currently exist or are expected to occur within the project area. The need serves as the foundation for the proposed project and provides the principal information upon which the "no-build" alternative discussion is based. It establishes the rationale for pursuing the action and is generally reflected in local, state or MPO/TPO transportation plans. The need should consist of a factual, objective description of the specific transportation problem supported by data and analysis. Detailed analysis supporting the need should be referenced in the purpose and need discussion.

The following list may assist project sponsors in the discussion of the need for the proposed action. This list is not all-inclusive. **With exception of the project status, the remaining elements are not applicable in every situation**.

1. **Project Status** - Discuss the planning status of a project documenting the progression of the project towards implementation. Due to the time elapsed between a document signed for public availability and the final Environmental Document, the status will likely require updating. Planning consistency is necessary to receive OEM approval. For the specific funding scenarios to obtain approval of the Environmental Document, refer to the ***Guidance for Meeting Planning Requirements for NEPA Approval*** prior to submitting the Environmental Document. See ***Part 1, Chapter 4, Project Development Process*** for more information on documenting planning consistency at the conclusion of PD&E and the ***FDOT/FHWA Consistency Guidance*** for more information on planning consistency.

Briefly discuss actions taken to date, coordination with other agencies and governmental units involved, actions pending, and schedules. Using the information contained in the appropriate planning consistency form (***Part 1, Chapter 4, Project Development Process***), present the project implementation information in a clear and concise manner. Summarize information contained in the planning documents including: project scope, project phases, cost, general funding sources, project description, and logical termini. Describe project implementation and document the status of the planning requirements as follows:

a. **MPO Areas:**

1. Identify which MPO the project is located in. The information provided in the Environmental Document must reference the MPO's current LRTP and TIP. Also, the current STIP should be used since the TIP must be consistent with the STIP.

2. Project limits: Confirm that the project description in the LRTP and Environmental Document are similar. Explain any differences, such as the ***NEPA*** project is a shorter section than what is described in the LRTP or that the Environmental Document includes more than one LRTP project. If the LRTP shows that the project will be implemented in segments, then the segments must be described. Also confirm that the STIP/TIP and Environmental Document descriptions are similar, describing any differences.

3. Project Funding: Provide a narrative referencing the Cost Feasible LRTP, STIP and TIP that describes all projects phases [PD&E, Design, Right of Way (ROW), and Construction], when those phases are anticipated, which phases are funded, and which type of funds are proposed to be used (e.g., state, local, federal, private or toll). If any phase is not funded, the estimated implementation dates should be provided, which can typically be found in the LRTP Needs Plan. The estimated total project cost and anticipated date of construction must also be included.

a. **Non-MPO Areas:**

1. In a non-MPO area, the information provided must reference the most current STIP. Acknowledge consistency with the Florida Transportation Plan. Other long range planning documents, such as SIS Cost Feasible Plan (CFP), Local Government Comprehensive Plan or other publicly adopted plans may be used to support the project's planned implementation.

2. Project limits: Confirm that the project description in the STIP or other long range document and Environmental Document are similar. Explain any differences, such as the ***NEPA*** project is a shorter section than what is described or that the Environmental Document includes more than one project.

3. Project Funding: Provide a narrative referencing the STIP or other transportation plan that describes all projects phases (PD&E, Design, ROW, and Construction), when those phases are anticipated, which phases are funded, and which type of funds are proposed to be used (e.g., state, local, federal, private or toll). If any phase is not funded, the estimated implementation dates should be provided. The estimated total project cost and anticipated date of construction must also be included.

In either case, if the project is going to be designed or constructed in segments, then these segments should be discussed in the Environmental Document and clearly shown on the project location map. This discussion should include the approximate implementation timeframes and estimated costs.

In this section briefly discuss planning consistency. If the project is an EA or EIS, a consistency form is prepared. There are two forms, ***Planning Requirements for Environmental Document Approvals, Form No. 650-050-41*** for use when there is no segmentation and ***Planning Requirements for Environmental Document Approvals with Segmented Implementation, Form No. 650-050-42*** which is completed for projects with segmented (phased) implementation.

The applicable form and LRTP, TIP, and current STIP pages should be included in the Appendix of the EA or EIS. The consistency form in an EA or Draft Environmental Impact Statement (DEIS) should tell the story of how and when the project will be implemented. The consistency form in an EA with Finding of No Significant Impact (FONSI), Final Environmental Impact Statement/Record of Decision (FEIS/ROD), or FEIS must be complete and include a signature when the final Environmental Document is submitted to OEM for approval. For Type 2 CE projects, planning consistency information is included in the ***Type 2 Categorical Exclusion Determination Form, Form No. 650-050-11,*** no separate form is needed.

When a draft Type 2 Categorical Exclusion (CE), EA or DEIS is released for public availability and there are inconsistencies between the Environmental Document and the planning documents, the Purpose and Need section of the Environmental Document should describe the differences and the steps needed to achieve consistency and a timeframe when this will occur. After the public hearing, planning consistency must be achieved prior to signing the Type 2 CE, EA with FONSI, ROD or FEIS/ROD. Please refer to the ***Guidance for Meeting Planning Requirements for NEPA Approval*** for additional information regarding planning consistency.

2. **System Linkage** - Is the proposed project a local, regional, or intraregional "connecting link"?

   Discuss how the proposed project fits into the existing and future local, regional and state transportation system (network) and contributes to the movement of people, goods, and services. Include a description of how the proposed action contributes to the multi-modal transportation network.

3. **Capacity** - Is the capacity of the existing facility inadequate to serve the traffic? What is the projected transportation demand? What capacity is needed? What is the Level of Service (LOS) for existing and proposed facilities?

   Discuss the capacity of the existing facility, its existing and anticipated LOS, and any operational deficiencies of the facility.

4. **Transportation Demand** - Will the project accommodate the forecasted transportation demand as shown in the adopted state and local transportation plans? Will the project meet future transportation demands based on projected population, employment growth, an increase in freight movement, or other demands on the transportation system?

   Discuss the project relationship to any statewide transportation plan or adopted urban transportation plan.

5. **Legislation** - Is there a federal, state, or local governmental mandate for the action?

   Document the need to respond to federal, state, or local government requirements.

6. **Social Demands or Economic Development** - What projected economic development/land use changes indicate the need to modify the transportation facility, network or system?

   Describe how the action will foster new employment, benefit schools, land use plans, recreation facilities. Discuss types of social and economic traffic generators, both existing and planned, which exert travel demands on the facility. For example, include businesses, neighborhoods, recreational facilities, shopping centers, new developments, and any other traffic generators which could increase travel demands on the proposed facility.

7. **Modal Interrelationships** - How will the proposed project interface with and serve to complement other modes of transportation such as airports, freight facilities, rail and port facilities, mass transit services?

   Identify the need to address other modes of transportation (e.g., airports, rail and port facilities, mass transit services, bicycle accommodations, ridesharing, special

use lanes) associated with the project and discuss how the proposed action will complement other modes.

8. **Safety** - Is the proposed project necessary to correct an existing or potential safety hazard? Is the existing crash rate higher than the statewide average for similar facilities? How will the proposed project improve it?

   Discuss crashes which have occurred in the study area that may indicate a need for improvement. The discussion may include crash types, frequency, crash pattern, crash contributing causes, and the rate of crashes when compared with the statewide average for similar facilities. Identify existing high-hazard sections of the facility and how the project will address the safety problem. Discuss any traffic or transportation safety issues which are or could become a problem (e.g., hazardous material transportation).

9. **Roadway Deficiencies** - Is the proposed project necessary to correct existing roadway deficiencies? How will the proposed project address the deficiencies? Is there a deficient or substandard bridge?

   The need and rationale behind reconstructing or replacing a roadway or existing bridge **must** be provided. Provide a detailed description of the existing structure(s) and their deficiencies. Deficiencies may include substandard geometrics, load limits on structures, inadequate typical sections, poor pavement condition, inadequate drainage, and inadequate SIS roadway design standards. For bridges, the deficiencies identified may be the result of structural and functional ratings, horizontal and vertical clearances, state of repair, weight restrictions or limitations.

1.2.2.2 Purpose and Need during the ETDM Screening

The purpose and need should be refined over time and become more detailed as the project advances through the Planning phase, ETDM process, and into the PD&E phase. A project's purpose is usually first identified in the transportation plan(s), e.g., MPO LRTPs, the SIS plan and the TIP/STIP. While the purpose of a project does not change substantially over time, it can change as the project advances and more information becomes available.

The OEM must provide opportunities for participating agencies; and the public to provide input on the purpose and need in accordance with ***23 U.S.C. § 139(f)*** Prior to engaging in the environmental review process, this obligation may be satisfied if agencies and the public are involved in the development of the project purpose and need during the transportation planning process. Nonetheless, FDOT accomplishes this goal through the ETDM process for all projects that are screened. The ETDM process has two screening events: the Planning and Programming Screens. See the ***ETDM Manual, Topic No. 650-000-002*** for more information on project screening.

The following briefly describes the purpose and need during the screening events:

1. Planning Screen - The Planning Screen may be the first opportunity agencies and other interested parties have to provide input on a project's purpose and need. Coordinate with the District Planning Office to obtain the project purpose as identified in the MPO/TPO LRTP and SIS Plan.

2. Programming Screen - The Programming Screen is intended to occur prior to a project's adoption into the FDOT Work Program or TIP/STIP, and/or prior to the PD&E phase. This screening helps focus the scope of the PD&E Study and can provide scoping information for an EIS, if necessary. The information for the purpose and need should be coordinated with the District Planning Office to ensure consistency. If the project was screened previously, then the purpose and need from the screening should be refined to reflect the information presented in the ***Planning Screen Summary Report*** with updated information, as appropriate. If any new information is available it should also be provided.

1.2.2.3 Purpose and Need during PD&E

The purpose and need information from the ***Programming Screen Summary Report*** is used to prepare the purpose and need for the Environmental Document. According to ***40 CFR § 1502.13***, "the statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." Review the most up to date transportation plans and verify whether information supporting the purpose and need is still valid, gather new data to fill any information gaps, and refine the purpose and need if necessary. OEM must be consulted if the project description or the purpose and need for a project changes substantially during the PD&E Study.

The purpose and need for PD&E:

1. Should be a statement of the transportation problem (not a statement of a solution such as specific project alternatives);

2. Should be based on articulated planning factors and developed through a planning process pursuant to applicable federal law;

3. Should be specific enough so that the range of alternatives developed will offer real potential for solutions to the transportation problem;

4. Must not be so narrow in definition or so specific as to pre-determine a solution;

5. May reflect other priorities and limitations in the area, such as environmental resources, growth management, land use planning, and economic development; and

6. Should not list specific design criteria or standards to be met by the project.

1.2.2.3.1 Documentation

The location of the project description and purpose and need in the Environmental Document differs depending on the COA:

1. **Type 2 CE** – Project description and purpose and need information is included in Section 1 (Project Description and Purpose and Need) of the ***Type 2 Categorical Exclusion Determination Form, Form No. 650-050-011***.

2. **EA or EIS** - Project description and purpose and need information is included in a section titled "Project Description and Purpose and Need".

3. **SEIR** – Project description and purpose and need information is included in Section 1 (Project Description and Purpose and Need) of the ***State Environmental Impact Report Form, Form No. 650-050-43.***

1.3 REFERENCES

American Association of State Highway and Transportation Offices (AASHTO). Practitioner's Handbook: Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects. August, 2007

Council on Environmental Quality (CEQ), Executive Office of the President, 1978. Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. Reprint 43 FR 55978-56007, 40 CFR Parts 1500-1508

FHWA, Environmental Review Toolkit: Development of Logical Project Termini and Elements of Purpose and Need. http://www.environment.fhwa.dot.gov/index.asp

FHWA, October 30, 1987. Guidance for Preparing and Processing Environmental and Section 4(f) Documents, FHWA Technical Advisory T6640.8A

FHWA memorandum "Guidance on Purpose and Need", to FHWA Division Administrators and FTA Regional Administrators, July 23, 2003

FDOT, Efficient Transportation Decision Making (ETDM) Manual, Topic No. 650-000-002 http://www.fdot.gov/environment/pubs/etdm/etdmmanual.shtm

Memorandum of Understanding Between FHWA and FDOT Concerning the State of Florida's Participation in the Surface Transportation Project Delivery Program Pursuant to 23 U.S.C. 327, December 14, 2016. http://www.fdot.gov/environment/pubs/Executed-FDOT-NEPA-Assignment-MOU-2016-1214.pdf

Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Section 6002

Section 339.177, Florida Statutes (F.S.)

Title 23 U.S.C. § 134

1.4 FORMS

Planning Requirements for Environmental Document Approvals, Form No. 650-050-41

Planning Requirements for Environmental Document Approvals with Segmented Implementation, Form No. 650-050-42

State Environmental Impact Report Form, Form No. 650-050-43

Type 2 Categorical Exclusion Determination Form, Form No. 650-050-011*

*To be completed in the StateWide Environmental Project Tracker

1.5 HISTORY

1/28/2003, 12/03/2012: Update combined two previous chapters (Part 2, Chapter 4, Project Description 12/6/2007 and Part 2, Chapter 5, Purpose of and Need for Action), 4/22/2014, 8/22/2016, 6/14/2017: NEPA Assignment and re-numbered from Part 2, Chapter 4