

# Planning Consistency for NEPA Practitioners

## 1. Introduction

Planning consistency is successfully met when local, state, and federal environmental documents reflect consistent project descriptions and information. This document provides guidance for completing planning consistency documentation in NEPA documents. For additional information on coordinating with Metropolitan Planning Organizations (MPO's) or Transportation Planning Organizations (TPO's) for amendments or modifications, please see the [Office of Policy Planning website](#).

To ensure compliance with the National Environmental Policy Act (NEPA) of 1969, planning consistency must be met before final environmental document approval by the Federal Highway Administration (FHWA). The Florida Department of Transportation has assumed the responsibilities of NEPA from FHWA through a Memorandum of Understanding originally signed on December 14, 2016 and renewed on May 26, 2022. on all federal projects on the State Highway System (SHS) and Local Agency Projects (LAP) off the SHS. Planning consistency is required to authorize the spending of federal dollars and thus advance to future phases of project development. This process ensures that environmental considerations are integrated into all stages of a project, starting locally and moving through the MPO, state, and federal plans demonstrating fiscal constraint and public transparency of federal transportation spending.

More information can be found in [Part 1, Chapter 2 Project Development and Environment Manual](#), and the [FDOT MPO Program Management Handbook](#).

### **Planning Consistency Definitions**

**Long Range Transportation Plan (LRTP)** – Planning document, developed by an MPO, that describes how proposed projects will help achieve the region's transportation vision. In Florida, LRTPs have a 20-year horizon period and are updated every 5 years. They must include a financial plan (cost feasible plan) described with sufficient detail to demonstrate how projects will be implemented over time.

**Transportation Improvement Program (TIP)** – A fiscally constrained programming document, developed and adopted by an MPO annually, that reflects cost feasible investment priorities established from the LRTP over the next 5 years.

**State Transportation Improvement Program (STIP)** – A federally mandated document that includes statewide listings of projects planned with federal participation in the next 4 fiscal years.

### **Planning Connectivity Overview**

Planning Connectivity refers to the integration of planning documents in the metropolitan transportation planning process, ensuring that transportation plans, such as the LRTP, TIP, and STIP align with the goals and objectives of communities. The LRTP is the building block of the transportation vision for a region, providing a broad framework for transportation investments and policy decisions and may incorporate other funding plans, such as the FDOT Strategic Intermodal System (SIS) Funding Plan, the State Modal Plans, and other local and regional planning documents. The TIP and STIP work together to implement the LRTP vision through available and committed funding sources over the next 5 years. There needs to be a

clear and identifiable linkage between projects included in the TIP/STIP and LRTP. The TIP must be incorporated into the STIP to ensure continued federal funding for the metropolitan area, and TIP projects must be identifiable in the MPO's LRTP as cost feasible. As projects evolve, it is important for regular coordination to occur between the project team, the FDOT district staff managing the project, and the FDOT MPO Liaison. This ensures the most up-to-date information and continued alignment between planning documents.

## 2. Planning Consistency Compliance

All federal projects must meet FHWA/FDOT planning consistency requirements. Federal projects include projects that receive federal dollars, constitute a federal action, or wish to maintain federal eligibility for future federal involvement. Federal projects within an MPO area must be included in the MPO's LRTP, TIP, and STIP. Exceptions to this include projects that may not need to be included in the LRTP because they are not regionally significant or capacity additions, such as a like-for-like bridge replacement project. For projects outside an MPO designation or with a Type 1 Categorical Exclusion determination as a minor project, inclusion in the STIP is sufficient to meet planning consistency.

Projects that deviate from the traditional Design-Bid-Build delivery process have additional considerations for planning consistency. These projects need to ensure that funding is secured for all of phases scoped to be advanced to procurement. For example, an Adjusted Score Design Build project would need to have the entire project funded because future funding will be spent under one contracting phase.

In some circumstances, LAP Projects are initially funded with local funds (usually prior to the LAP agreement being executed) and may not have federal funds until later phases, such as construction. These projects should still be included as cost feasible in the LRTP and the local funds should be identified in the local agency's Capital Improvement Plan (CIP) to confirm the source of funding, project cost and project timeframe. If a funding source has not been identified for a future phase, an alternative method(s) of funding the project must be described in the cost feasible plan or planning consistency table.

### **Completing the Planning Consistency Table**

Planning documents included in the environmental document, such as the LRTP and TIP, must be the most recently adopted, including the currently adopted versions. The Current STIP should be used in planning consistency documentation instead of the Approved STIP, as the Current STIP provides the latest project information. Other long range planning documents or local and state plans such as the SIS Plan can be included to support project implementation, if needed.

The planning consistency table documents project implementation. It should be filled out in the Statewide Environmental Project Tracker (SWEPT) and attached directly into the environmental document or reevaluation form. For projects with multiple segments, a table for each segment should be added in the SWEPT table function detailing each segment's limits, phases, costs, and timeframe.

When evaluating project implementation, FHWA requires current and future costs and timeframes for three phases: Preliminary Engineering (PE), Right-of-Way, and Construction. Costs for phases that have already passed do not need to be documented or referenced.

## TIP/STIP Consistency

The TIP and STIP are consistent when:

- Project information (name, limits, scope, costs, and timeframe) is consistent across both documents and matches the NEPA environmental documents.
- Full project costs in the TIP do not exceed 20% **and** \$2 Million dollars of what is programmed in the STIP.

## L RTP and TIP/STIP Consistency

Projects in the LRTP must be described in the Cost Feasible Plan in enough detail to understand project phases, costs and implementation. This includes description/name, limits, cost estimates, timeframe in band years, and full project costs. Per the *2018 FHWA Expectations Letter*, the source of funding for each phase must be documented in the first 10 years of the LRTP. More information on LRTP Consistency and documentation is included in the [LRTP Expectations Letters](#).

The LRTP and TIP/STIP are consistent when:

- Project information (name, limits, scope, costs, and timeframe) is consistent between the LRTP, TIP, and STIP and matches the environmental documents. Minor variations in project limits can be acceptable, as long as there are no major scope changes.
- Full project costs in the LRTP do not exceed 50% **and** \$50 Million of what is programmed in the TIP/STIP.

## Acceptable Funding Scenarios

The ideal funding scenario is for the entire project to be funded to completion. At a minimum, the next phase of the entire project must be funded (Project Scenario 1). The intent is to eliminate open-ended projects, by ensuring all projects started have a reasonable timeframe for completion.

For projects with multiple segments, these scenarios are acceptable:

- One segment funded entirely through completion (Project Scenario 3).
- All segments of the project for the entire PD&E limits funded for the next phase (Project Scenario 2).

Project Scenario 1 ✓		
Seg 1	Seg 2	Seg 3
PE	PE	PE
ROW	ROW	ROW
CST	CST	CST

The ideal scenario for FHWA/FDOT approval is full funding of all three phases for all project segments in the LRTP Cost Feasible Plan.

Project Scenario 2 ✓		
Seg 1	Seg 2	Seg 3
PE	PE	PE
ROW	ROW	ROW
CST	CST	CST

Funding for the subsequent phase across all project segments is acceptable. If a project is in PE, then ROW must be funded for the entire project limits.

Project Scenario 3 ✓		
Seg 1	Seg 2	Seg 3
PE	PE	PE
ROW	ROW	ROW
CST	CST	CST

Funding of all three phases (PE, ROW, CST) for one segment is acceptable.

Funded in LRTP Cost Feasible Plan

NOT Funded in the LRTP Cost Feasible Plan

### 3. Does Not Meet Planning Consistency (non-Compliance)

If it is determined that the project does not meet the planning consistency requirements stated above, the first step is to contact the FDOT MPO Liaison. They will provide guidance for a solution to meet planning consistency. The project could require modifying or amending the MPO documents (LRTP or TIP), coordinating with the MPO Board, or an amendment of the STIP. The TIP must be updated before initiation of a STIP amendment can begin. The MPO Liaison will be the best resource to determine the most practical solution.

Significant project revisions could require the need for an amendment to the LRTP or TIP. An amendment is a more extensive and timelier process than an administrative modification, involving public review and a Board action to remonstrate fiscal constraint. It is recommended that the Districts work with the MPO Liaisons to understand each MPO's amendment procedures and to build a timeline for a solution that will lessen impact to the project schedule. [FDOT/FHWA Guidance](#) outlines minimum thresholds for project changes that trigger an amendment.

If approval of an environmental document is needed prior to updates to the LRTP, TIP, or STIP being finalized, contact OEM for additional coordination.