

Planning and Environment Linkages

Reference Links

- AASHTO CEE - Environmental Considerations in Planning(Direct to: http://environment.transportation.org/environmental_issues/environ_planning/#bookmarkFHWAPlanningRulesandGuidanceonNEPAPlanningLinkageAppendixAto23CFR450)
- 40 CFR Chapter V Section 1501.2 Apply NEPA early in the process(Direct to: http://www.ecfr.gov/cgi-bin/text-idx?SID=5e48cfe1fac057a708f74b3bad539716&mc=true&node=se40.33.1501_12&rgn=div8)
- Re: NEPA - FHWA(Direct to: <https://collaboration.fhwa.dot.gov/dot/fhwa/ReNepa/default.aspx>)
- Practitioner's Handbooks(Direct to: http://environment.transportation.org/center/products_programs/practitioners_handbooks.aspx)
- FHWA Planning and Environment Linkages(Direct to: <http://environment.fhwa.dot.gov/integ/index.asp>)
- Environmental Considerations in Planning, Section 6001(Direct to: <http://environment.fhwa.dot.gov/integ/related.asp>)
- SAFETEA-LU(Direct to: <http://www.fhwa.dot.gov/safetealu/>)
- Planning and Environmental Linkages - Questions and Answers, FHWA(Direct to: <http://www.fhwa.dot.gov/hep/guidance/pel/pelfaq16nov.cfm>)

When a transportation improvement project is being considered, many residents believe that the bulldozers will arrive tomorrow. In contrast, the MPO Long Range Plan is often viewed as part of the distant and uncertain future. Linking long range planning and environmental review can help overcome this public confusion and focus stakeholder engagement as well as save time and money.

The graphic above illustrates the close correlation between actions in transportation planning and those in the NEPA process. Planning starts with the community context and is grounded in strong public and stakeholder involvement. Using this planning data can inform NEPA about community support for a project and potential controversial areas. The public is often frustrated when planning decisions are changed during NEPA. Additional details and effectively linking the two processes can help the public understand the relationship between the plan and the project. Environmental screening initiated in long range planning enables advanced mitigation of environmental and community impacts.

In order to effectively integrate planning and NEPA, documentation is essential. This record keeping allows decisions made in planning to be supported during NEPA without the need for re-do loops. This challenge to integration can be addressed through data and tools as well as documented decisions.

Planning and Environment Linkages allows projects to move more quickly by building on existing decisions and taking advantage of prior work; thus, reducing the redundancy in decision making. When NEPA practitioners and planners collaborate to successfully integrate the products from long range planning into the consideration of project alternatives, project development is more efficient, programming is more realistic, and early protection of the environment is possible. This application identifies the data, analysis, and decisions that transfer between the processes as well as the individual key decisions that they support.

Long Range Transportation Planning

- LRP-1 - Approve Scope of LRTP Process
Project specific information gathered in scoping the LRTP is transferred to the ENV-1 for inclusion in project scoping.
- LRP-2 - Approve Vision and Goals
The regional vision and goals informs the project scope at ENV-1.
- LRP-3 - Approve Evaluation Criteria, Methods and Measures
The evaluation criteria and methods used in LRP, along with associated metrics, is considered in the development of project evaluation criteria at ENV-5.
- LRP-4 - Approve Transportation Deficiencies
Transportation deficiencies, especially those in the project area, inform purpose and need for ENV-3.
- LRP-5 - Approve Financial Assumptions
This key decision is not associated with application.
- LRP-6 - Approve Strategies
The approved range of strategies from LRP provides a regional context for scoping environmental review (ENV-1).
- LRP-6 - Approve Strategies
The approved range of strategies from LRP provides a regional context for scoping environmental review (ENV-1).
- LRP-7 - Approve Plan Scenarios
The basis for the elimination of specific scenarios in long range planning (including associated data and level of detail) informs the determination of an appropriate study area for the project at ENV-4. This information may also be used for documentation purposes at ENV-6.
- LRP-8 - Adopt Preferred Plan Scenario
The adopted preferred plan scenario identifies the strategy used to address the transportation deficiency as well as the project concept that will be used for programming. This information informs the selection of alternatives at ENV-7.
- LRP-9 - Make Conformity Determination by MPO
This key decision is not associated with application.

- LRP-10 - Adopt LRTP by MPO
The adopted LRP informs the scope of environmental review (LRP-1). Any advance mitigation strategies and agreements inform avoidance, minimization and mitigation incorporated at ENV-8, ENV-12 and ENV-15.
- LRP-11 - Make Conformity Determination
Approval of the conformity analysis is essential information to inform the Draft EIS at ENV-8.

Programming

- PRO-1 - Approve Revenue Sources
This key decision is not associated with application.
- PRO-2 - Approve Methodology for Identifying Project Costs and Criteria for Allocating Revenue
This key decision is not associated with application.
- PRO-3 - Approve Project List Drawn from Adopted Plan Scenario or Solution Set
This key decision is not associated with application.
- PRO-4 - Approve Project Prioritization
This key decision is not associated with application.
- PRO-5 - Reach Consensus on Draft TIP
This key decision is not associated with application.
- PRO-6 - Adopt TIP by MPO
This key decision is not associated with application.
- PRO-7 - Approve TIP by Governor and Incorporate into Draft STIP
This key decision is not associated with application.
- PRO-8 - Reach Consensus on Draft STIP
This key decision is not associated with application.
- PRO-9 - Approve STIP with respect to Fiscal Constraint
This key decision is not associated with application.

Corridor Planning

- COR-1 - Approve Scope of Corridor Planning Process
This key decision is not associated with application.
- COR-2 - Approve Problem Statements and Opportunities
This key decision is not associated with application.
- COR-3 - Approve Goals for the Corridor
This key decision is not associated with application.
- COR-4 - Reach Consensus on Scope of Environmental Review and Analysis
This key decision is not associated with application.
- COR-5 - Approve Evaluation Criteria, Methods and Measures
This key decision is not associated with application.
- COR-6 - Approve Range of Solution Sets
This key decision is not associated with application.
- COR-7 - Adopt Preferred Solution Set
This key decision is not associated with application.
- COR-8 - Approve Evaluation Criteria, Methods and Measures for Prioritization of Projects
This key decision is not associated with application.
- COR-9 - Adopt Priorities for Implementation
This key decision is not associated with application.

Environmental Review/NEPA Merged with Permitting

- ENV-1 - Reach Consensus on Scope of Environmental Review
Project specific information from LRTP scoping (LRP-1), the regional vision and goals (LRP-2) and the adopted LRTP (LRP-10) inform the scope of the environmental review. The approved range of strategies (LRP-6) provides a regional context.
- ENV-2 - Approve Notice of Intent
This key decision is not associated with application.
- ENV-3 - Approve Purpose and Need/Reach Consensus on Project Purpose
Transportation deficiencies from the regional analysis (LRP-4) provide the basis for the traffic analysis and forecast required for purpose and need. The purpose and need should be consistent with the regional vision and goals (LRP-2).
- ENV-4 - Reach Consensus on Study Area
Regional data along with specific scenarios that were eliminated in the planning phase (LRP-7) inform identification of the initial project study area.
- ENV-5 - Approve Evaluation Criteria, Methods and Measures
The evaluation criteria, methods and measures for comparing alternatives is informed by that used in LRP-3 specific to this need and project concept.
- ENV-6 - Approve Full Range of Alternatives
The identification of the full range of alternatives should be consistent with those approved in LRP-7.
- ENV-7 - Approve Alternatives to be Carried Forward
The preferred plan scenario from LRP-8 informs the alternative carried forward in order to preclude inconsistencies with region-wide multimodal improvements.

- ENV-8 - Approve Draft EIS with Conceptual Mitigation
An advance mitigation strategy and agreements from the LRTP (LRP-10) should inform conceptual mitigation incorporated in the Draft EIS.
- ENV-9 - Approve Resource Agency Public Notice
This key decision is not associated with application.
- ENV-10 - Approve Preferred Alternative / LEDPA
The preliminary design of the preferred alternative/LEDPA must be validated with the adopted LRTP (LRP-10) to ensure consistency, fiscal constraint and that air quality conformity is maintained. Plan amendment may be required.
- ENV-11 - Approve Final Jurisdictional Determination
This key decision is not associated with application.
- ENV-12 - Reach Consensus on Avoidance and Minimization for the LEDPA
An advance mitigation strategy and agreements from the LRTP (LRP-10) should inform avoidance and minimization for the LEDPA.
- ENV-13 - Approve Final EIS
This key decision is not associated with application.
- ENV-14 - Approve the Record of Decision
This key decision is not associated with application.
- ENV-15 - Render Permit Decision and Approve Avoidance and Minimization
An advance mitigation strategy and agreements from the LRTP (LRP-10) should inform avoidance, minimization and compensatory mitigation incorporated in permit conditions.

The PlanWorks Approach

Linking MPO planning with the environmental review process under NEPA provides consistency between the selected project alternative and the adopted long range transportation plan. Planworks provides the structure needed to identify those key decisions in long range transportation planning and environmental review that must remain coordinated and/or consistent in order to avoid the associated risks of re-do loops and other inefficiencies that impact funding and schedules.

Because the Decision Guide identifies specifically what information should be transferred between phases and for what purpose at individual key decisions, practitioners interested in collaboration as a means to link MPO planning and NEPA will find the support needed. Supporting information includes:

1. The roles and interests of decision makers and key participants
2. Information that should be transferred at individual key decisions
3. Supporting data, tools, and technology for collaboration between the phase

Federal support for the concept

Federal law and guidance clearly supports linking planning and NEPA. SAFETEA-LU supports the integration of planning and NEPA through implementing guidance and regulations for planning (see AASHTO CEE - Environmental Considerations in Planning) The National Environmental Policy Act and the Council on Environmental Quality regulations encourage linking planning and NEPA (see 40 CFR Chapter V Section 1501.2 Apply NEPA early in the process). In addition, existing case law upholding the use of planning products in the NEPA process, support linking of planning and NEPA. Legislation and guidance encourage collaboration between planners and NEPA practitioners in order to achieve several benefits including:

- Increased consultation among partners
- Identification of potential broad scale mitigation opportunities
- A clear authority to use planning level analyses and decisions during NEPA

For additional guidance see FHWA Planning and Environment Linkages Website.

Decision Making Partner Interests in Long Range Planning and Environmental Review

The Decision Guide data is based on considering all partner interests in transportation decision making: in other words, the specific perspective or values that a decision making partner brings into the process. For example, FHWA/FTA has an "interest" in ensuring that the requirements of the federal regulations are met. The Decision Guide considers the identified interests of the four partners and of the stakeholders in each phase of transportation decision making. The table below allows you to compare the interests of each partnering agency in both long range planning and environmental review. An understanding of interests may provide additional understanding for efforts to integrate these two phases.

Agency	Partner Interests in Long Range Planning	Partner Interests in Environmental Review
FHWA/FTA	<ul style="list-style-type: none"> • Is collaborative and inclusive with stakeholders and the public • Reflects the community vision and goals • Protects the use of public funds • Meets all legal and regulatory requirements • Meets air quality conformity 	<ul style="list-style-type: none"> • Is collaborative and inclusive with stakeholders and the public • Built on the foundation of previous processes • Correctly/accurately describes the process. • Meets legal and regulatory requirements
DOTs	<ul style="list-style-type: none"> • Considers state needs and deficiencies equally with other concerns • Considers how proposed uses affect functional classification and system ownership • Reflects interconnectivity decisions that will not adversely affect the state's system 	<ul style="list-style-type: none"> • Is collaborative and inclusive with stakeholders and the public • Is comprehensive and fully disclosed • Incorporates input from regulatory agencies and other partners • Builds on previous processes • Begins after funding has been identified for a

Agency	Partner Interests in Long Range Planning	Partner Interests in Environmental Review
	<ul style="list-style-type: none"> Does not create a problem for design, maintenance, operations, and expansion Conforms with the TIP/STIP Meets air quality conformity 	<ul style="list-style-type: none"> project Based on an agreement among all partners as to the content of the NEPA document Reflects streamlining through meaningful participation by all with attention to budget and schedule Meets FHWA approval
MPOs	<ul style="list-style-type: none"> Is fiscally constrained Meets federal regulations Conforms to air quality requirements Is developed with broad consultation Ensures equity (political, geographic, social) Promotes consistency between transportation improvements and state/local planned growth and economic development patterns (land use) Explores all possibilities and is realistic Increases the accessibility and mobility for both people and freight Enhances integration and connectivity across modes for people and freight Emphasizes the preservation of the existing transportation system Promotes efficient system management and operation Increases the safety of the system for all users Increases the security of the system for all users Addresses the economic vitality of the area Promotes energy conservation and quality of life Protects and enhances both the human and natural environment 	<ul style="list-style-type: none"> Is well documented in order to inform planning processes Follows a public participation process Is consistent with the program and long range transportation plan or identifies the reason for any changes. Is consistent with regional information relied upon to develop the long range plan such as land development and conservation planning
Resource Agencies	<ul style="list-style-type: none"> Incorporates conservation planning Incorporates and document large scale avoidance and minimization Consider indirect and cumulative impacts/land use issues 	<ul style="list-style-type: none"> Builds on the foundation of previous planning processes Is legally sufficient Is coordinated with other permitting requirements (e.g. Clean Water Act) Follows an appropriate sequence - avoid, minimize, mitigate Addresses a true need/deficiency Based on an agreement among all partners as to the content of the NEPA document Is inclusive of the public and stakeholders

RISKS AND RISK MANAGEMENT

PlanWorks provides several resources to assist in risk management of efforts to link MPO planning and NEPA. The table below can help guide you to the appropriate area of the site.

Risks	Risk Management Strategies
<p>Overcoming The Different Scale of Information in Planning and NEPA</p> <p>Overcoming the different scales of planning and NEPA can be a challenge. Planning solutions are meaningful at a systems level while NEPA analysis is more detailed, smaller in scale, and greater in precision. While some decisions can be transferred directly from planning to NEPA, other decisions can only be used to inform the environmental review process. Tiered decision making, using sub-area or corridor studies, can help refine the level of analysis to more easily address the requirements within the NEPA process. Scale is also a factor in the specific tools used to support analysis at the regional and project level.</p>	<p>Use Sub-area and Corridor Studies: For some projects, one way to minimize the scale issues of linking planning and NEPA is to conduct additional planning studies, such as sub-area and corridor studies. These studies allow planners to gather additional details on the project, including potential environmental impacts. This additional level of detail allows a tiering down of decision making. See Corridor Studies application.</p> <p>Use Supporting Tools and Technology: Although the tools most often used for a systems-level analysis are not sufficient for analysis at the project level, there are supporting technologies that reduce the need for duplicative efforts. Capacity analysis and the use of simulation modeling are two areas where the scale difference may be bridged.</p>
<p>Increased Demand on Staff and Agency Resources</p> <p>Linking planning and NEPA is sometimes perceived as requiring additional work of the MPO staff and resource agencies where resources are limited. This demand is often magnified by a lack of understanding of the individual agency processes and requirements. Collaboration, either through formal</p>	<p>Develop Cooperative Agreements: In some cases, cooperative agreements between planning partners may aid in the availability of staff and resources. MOU/MOA represent formal ways to establishing decision making relationships and sharing of resources, but there are many other less formal ways to collaborate. Some state DOTs fund positions at</p>

