

# Guidance for Developing Preliminary Purpose and Needs Statements in the Planning Process

## For use by Local Public Agencies (LPAs) when submitting project applications and Stage 0 Documentation to LDOTD

Date: January 2014

### Background and Importance:

The requirement for the purpose and need statement for an action/project began when the National Environmental Policy Act (NEPA) was signed into law in 1970. NEPA requires all federal agencies to consider the impacts of their actions on the environment. The purpose and need statement is the most important section of the environmental document and establishes the reason why an agency is proposing a project. In addition, the purpose and need statement justifies the expected outcome of public expenditure and allows decisions to be defensible.

A purpose and need statement is required to be included in all environmental studies prepared for LADOTD/FHWA Review. These studies include Environmental Impact Statements (EIS), Environmental Assessments (EA) and Categorical Exclusions (CE). This memorandum is intended to create a uniform approach when developing purpose and need statements. Most importantly this document should be used as an informational toolkit when developing purpose and need statements.

### Legal Guidance:

Legal guidance originates from the **NEPA CEQ Regulation 40 CFR 1502.13** – which states “The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” Each federal agency has its own federal regulations and corresponding guidance on developing NEPA Documents. Policies and procedures required of FHWA are established under **23 CFR 771** corresponding guidance is provided through **FHWA Technical Advisory T 6640.8A**.

**FHWA Technical Advisory T 6640.8A** directs State DOT’s to “identify and describe the proposed action and the transportation problem(s) or other needs which it is intended to address.” The FHWA Technical Advisory (TA) goes on to highlight nine examples that may be helpful in explaining the established need for a proposed action/project.

1. Project Status – briefly describe the project history including actions taken to date, other agencies and governmental units involved, actions pending, schedules, etc.
2. System linkage – Is the proposed project a “connecting link?” How does it fit in the transportation system?
3. Capacity – Is the capacity of the present facility inadequate for the present traffic? Projected traffic? What capacity is needed? What is the level(s) of service for existing and proposed facilities?
4. Transportation Demand – Including relationship to any statewide plan or adopted transportation plan together with an explanation of the project’s traffic forecasts that

are substantially different from those estimates from the planning process required by 23 USC 134.

5. Legislation – Is there a Federal, State or local governmental mandate for action?
6. Social Demands or Economic Development – New employment, schools, land use plans, recreation, etc. What project economic development/land use changes indicate the need to improve or add to the highway capacity?
7. Model Interrelationships – How will the proposed facility interface with and serve to complement airports, rail and port facilities, mass transit services, etc.?
8. Safety – Is the proposed project necessary to correct an existing or potential safety hazard? Is the existing crash rate excessively high? Why? How will the proposed project improve it?
9. Roadway Deficiencies – Is the proposed project necessary to correct existing roadway deficiencies (e.g. substandard geometrics, load limits on structures, inadequate cross-section or high maintenance costs)? How will the proposed project improve it?

It should be noted that this list is intended to be used as a guide and should not be considered all-inclusive.

### **Importance of Purpose and Need in the Planning Process:**

Recently, with the introduction of FHWA's Every Day Counts initiative there has been strong interest geared towards shortening the project delivery process through "Planning and Environment Linkages". LADOTD has committed to the initiative by incorporating it into the Stage 0 (Planning) process and an important part of this includes the early development of purpose and need statements. In addition 23 CFR Appendix A to Part 450 (Linking the Transportation Planning and NEPA Processes) states "The transportation planning process also provides a potential forum to define a project's purpose and need by framing the scope of the problem to be addressed by a proposed project." It should be noted that a purpose and need statement will only be **preliminary** at the end of the planning process because a project will continue to be developed through Stage 1 (Environmental).

It is important to be sure that data and decision making made at the planning level continues into the next stages of project development. This can be done by documenting any relevant information (i.e. information and forecast of vehicle miles of travel, travel demand, highway and travel speeds, traffic diversion, crash rates, etc.) used to develop the purpose and need. The DOTD Stage 0 checklists can be a useful tool for documenting this information.

### **Developing the Purpose and Need Statement:**

Keeping in mind the directive to "**identify and describe the proposed action and the transportation problem(s)** or other needs which it is intended to address" the purpose and need should clearly demonstrate that a "need" exists and should define that "need" in terms understandable to the general public. The purpose and need statement sets the stage for the identification and evaluation of reasonable project alternatives and ultimately the selection of a preferred alternative.

- ▶ **A. The Purpose** – Defines the transportation problem (need) to be solved and outlines the goals and the objectives of a specific project. It should be noted that the purpose is not a solution but the reason why an agency is proposing a certain project. For example, "The purpose of this project is to widen the roadway from 2 to 4 lanes" is

incorrect. It should state, “The purpose of this project is to increase capacity of the roadway due to the projected major increase in future traffic volumes.” Examples for what **NOT** to use for a purpose statement: “The Mayor needs this project done for his re-election; Congress earmarked the funding, so we need to do this project; This improvement serves an area where politically powerful people live; City A got this type of project, so we need one too.”

**B. The Need (Problem)** – Provides data to support the problem statement (purpose). In addition, the need describes the key problem or problems and the cause of those problems that are being addressed by the proposed project/action. The need provides the factual foundation for the statement of the project purpose (establishes the evidence that a problem exists). Empirical data in tables and graphs should be used to document a demonstrated need.

**C. Primary Purpose vs. Secondary Purpose** – It should be noted that when developing a purpose and need statement there can be a primary and a secondary purpose.

- **Primary Purpose** – Is the “driver” of the project (reflects the fundamental reason why the project is being pursued).
- **Secondary Purpose** (or other desirable outcome) – Is an additional purpose that is desirable, but not the core purpose of the project.

**Example** – The purpose of this project is to improve roadway deficiencies (primary purpose) along John Stine Road between I-10 and LA 378 Spur. In addition, a goal of this project is to improve safety conditions (secondary purpose) for vehicle and pedestrian traffic. (Data must be provided to support both primary and secondary purposes.)

***It is important to identify the true driver (primary purpose) of the proposed project during the planning process.***

#### **D. Logical Termini:**

The discussion of logical termini is very important in the development of purpose and need statements as it defines the project limits for environmental documents. The term “logical termini” refers to (1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts. The purpose and need of a proposed project/action should establish and justify logical termini.

Establishing logical termini supports the decision to propose a project between two points, documents the supporting information used to justify the chosen termini and helps prevent segmentation of projects.

**E. Other Goals and Objectives** – Project outcomes beyond the transportation issues identified in the project purpose should be included in the purpose and need statement as goals and objectives. The goals and objectives should balance environmental, transportation and other values. There should be acknowledgement of early interagency coordination to support environmental stewardship, streamlining and project delivery.

The Goals and Objectives will be different for each project and may include the following:

- **Community Goals** – improving air quality, supporting economic development or creating an uncongested, pedestrian-friendly downtown business district.
- **Environmental Goals** – avoidance and minimization of impacts, or enhancement opportunities.
- **Regulatory Compliance** – complying with the requirements of regulatory agencies such as protecting wetlands, wildlife or historic properties.

### **Examples of Proposed Actions:**

1. **System Linkage** – When considering system linkage as a purpose there must be an underlying need for generating a connection/link. (Links include connection of existing transportation facilities, modal facilities, geographic areas etc.) How does it fit in the transportation system? It should be noted that typically system linkage doesn't stand on its own merit as a primary link and careful consideration should be given when defining system linkage as a primary purpose.

**Example** – Red Road runs through the City of Green and connects several schools, shopping areas and medical facilities to the down town area. Some sections of Red Road have sidewalks, others do not. Also, at the north end of Red Road is the large community park that the City has recently updated. One of City's community goals is to become a more walkable community. It has identified Red Road as their first priority.

The **Purpose** of this project is to improve the linkage along Red Road by completing all sidewalks sections, so the entire length of the road is walkable and safe for pedestrians of all ages.

The **Need** to complete all sidewalk sections along Red Road so that it is a safe and walkable corridor is important for connecting the city's schools, shopping areas, medical facilities & down town. City of Green Police have identified this corridor as one where "near miss" potential crashes between pedestrian and vehicles have been happening more often in the past 2 years. With increased pedestrian traffic, they see serious safety issues.

2. **Capacity** – When considering capacity as a purpose you must ask: Is the capacity of the present facility inadequate for the present traffic? Projected traffic? What capacity is needed? What is the level of service for existing and proposed facilities? Existing and projected future traffic data (traffic counts, level of service, etc.) should be provided to support capacity as a need.

**Example** – Congestion continues to be a problem along existing Hwy 25 between River Road and Hwy 12. Hwy 25 is a four lane undivided commercial corridor. Poor planning has resulted in a large number of access points along the roadway causing

the inefficient operation of the facility as shown by lengthy delays and a poor level of service.

The **Purpose** of this project is to improve capacity by reducing congestion and improving operation of the corridor.

The **Need** is to reduce the number of access points along the corridor which are causing a large number of vehicle conflict points. Studies show by implementing access management strategies and reducing conflict points, the overall level of service will be improved resulting in improved operational efficiency of the roadway, Financial savings will be realized in the reduced need for future investments in additional travel lanes and right-of-way.

- 3. Transportation Demand** – Demand as a potential purpose should be based around the discussion of the proposed project relationship to statewide plans, or adopted urban transportation plans. In addition, explain any related traffic forecasts that are significantly different from previous estimates.

**Example** – The intersection of W South Street and LA “B” in Any Parish currently consists of a four-way stop. Due to an increase in development in this area, the intersection experiences a poor level of service and has seen a substantial increase in delay. In addition, it is a goal for this community to convert the stop controlled intersections along this roadway to roundabouts in order to improve the operation of entire corridor.

The **Purpose** of this project is to reduce delay and improve the operation of the intersection.

The **Need** of this project is to improve congestion, emissions, and operations. Data shows that Roundabouts reduce delay and decrease emissions from idling vehicles and is possibly a good solution to the issues at this intersection.

- 4. Legislation** – When using a Federal, State or local government mandate to support the purpose and need for a proposed project/action it is important to check the wording of the legislation for specific references to the project with respect to design, location, mode, etc. It may be appropriate to use legislation as a secondary purpose if there is only a brief description of the project included in the measure. Legislation is rarely used in the primary purpose & need for the project.

**Example** – Hwy 84 between Town A and Town B is currently two lane road from the junction of Hwy 3037 to Hwy 124. Due to a recent large development and forecasted growth, there is a projected need for increased capacity.

The **Purpose** of this project is to increase capacity along Hwy 84 between Town A and Town B.

(Additionally, according to the 2009 list of congressionally earmarked projects, the funding should be used to widen Hwy 84 to four lanes from its junction with Hwy 3037 to the junction of Hwy 124 - could be considered a secondary purpose.)

The **Need** is to accommodate the projected future traffic needs along the roadway, because the road will not meet future traffic demand in its current configuration.

- 5. Economic Development** – When using growth and/or economic development to support the purpose and need for a proposed project/action, the statement should include a description of how the action will foster new employment, benefit schools, land use plans and recreation facilities. In addition it is important that the purpose and need be grounded in **transportation** and as such a description of the projected economic development/land use changes that indicate the need to improve or add to the highway capacity is included. Economic impact and forecasting analysis are needed to support this statement.

**Example** – Over the past few years, Parish Z has experienced a tremendous increase in traffic in the vicinity of the I-99 and US 999 interchange as a result of a lack of long-range transportation planning. New, significant businesses, including big box stores and an existing adjacent racetrack and casino are causing increased transportation demands along the existing network. In addition, a planned expansion of the racetrack and casino facility through adjacent available lands located in the southeast quadrant of the interchange has been proposed. It has been shown that the proposed development can generate increases in annual sales tax revenue for both Parish Z and its town(s).

The **Purpose** of this project is to facilitate economic development by improving access and traffic operations to both developed and undeveloped lands located near the interchange.

The **Need** for this project is to reduce the existing congestion at the interchange. Based on a report by ABC Consultants, improving this access will facilitate job increases in Parish Z along with reducing transit times to area schools. Additionally, the congestion along the existing transportation network will be eased, supporting local businesses.

- 6. Modal Interrelationships** – An explanation of how a proposed project/action will interface with and serve to compliment various modes of transportation such as airports, rail facilities, port facilities and mass transit services when using modal interrelationships to support a purpose and need.

**Example** – Existing LA 32 connects to I-99 but not to I-100 in Any Parish and extends to Hwy 10 next to a Regional Airport. LA 32 currently handles the majority of airport-related traffic while also serving as a vital link for local businesses, but cannot get vehicles to I-100 without first routing them onto I-99.

The **Purpose** of this project is to improve intermodal connectivity by creating a direct link between the Regional Airport and I-100. By extending LA 32 from its current terminus at the Airport to I-100, this will provide direct links from the Airport to both I-99 and I-100.

**Example** – The River Port is expanding its facility to receive more goods. Hwy 10 connects the port to I-99. This two lane road is currently at capacity and will not be able to accommodate the future freight traffic.

The **Purpose** of this project is to improve intermodal connectivity by creating a corridor with increased capacity along Hwy 10 to I-99.

The **Need** for this project is to ensure that the increased freight from the River Port can reach I-99 without significant delays. The current level of service is D and without improvements is projected to be Level F in less than two years.

- 7. Safety** – Historically, safety has been incorporated into purpose and need statements based on the assumption that by simply modifying a facility it will become safer and that typically is NOT the case. When incorporating safety into the purpose and need for a proposed action an actual safety problem must have been identified. The safety argument should be supported by abnormal crash rates, occurrence of correctable crash types (head on, rear end, weather etc.) and/or identification of problem areas (roadway section, railroad crossing, signalized intersection etc.). In most cases crash data is compared to the “average rate” and a comparison is performed to demonstrate that a safety problem exists. It is also important to know when to use safety as a primary or secondary purpose.

**Example 1** – East Street is a roadway corridor owned and maintained by Anytown, LA. The total length of the roadway is 6 miles starting at LA “X” and ending at U.S. “Y”. The roadway consists of a 2 lane roadway with 8' wide paved shoulders, which has seen tremendous increase in use by both recreational and competitive bicyclists and runners alike in the past few years. In addition, it is Anytown’s plan to continue to encourage & promote the use of these paved shoulders by the bicycling and jogging community. They want to provide striping, pavement markings and signing to dedicate a portion of the shoulder for these users.

The **Purpose** of this project is to improve and enhance the safe usage of biking/running in this corridor

The **Need:** Due to a 30% increase in bikers and runners in this area from 2010 to 2013, there is an increase in conflicts with vehicles. There have been 2 serious injury crashes in the past 3 years. The Anytown Police Department have also identified locations along where “near misses” have been observed on a regular basis

**Example 2** – At the signalized intersection of LA “A” and East Drive, there have been a large number of rear end crashes. The community is concerned that due to the presence of a nearby high school, these inexperienced drivers are contributing to this high number of crashes. In order to solve this problem, safety countermeasures will be installed.

The **Purpose** of this project is to improve safety at the intersection of LA “A” and East Drive through the use of safety countermeasures.

The **Need** for this project is to reduce the number of crashes. Between 2010 and 2012, there were 131 crashes at this location, 82% of these crashes were intersection related. Statistics show that these types of crashes can be decreased by implementing safety countermeasures at the intersection.

- 8. Roadway Deficiencies** – Roadway or facility deficiencies are physical characteristics of a facility that are functioning below the desired performance: substandard geometrics, load limits on structures, inadequate cross-sections and/or high maintenance costs. Needs associated with poor performance of roadways and bridges are typically identified through the pavement and bridge management systems. Design manuals and guidelines are used to determine if a facility meets current standards and policies.

**Example** – North Boulevard in Any Parish from US “C” to LA “D” is currently carrying a daily traffic volume of approximately 12,000 vehicles, 18% of which are heavy trucks with two or more axles. This 3 mile corridor functions as a collector/distributor roadway for the surrounding neighborhoods while providing an important transportation link for through traffic and services two commercial zones. One of the zones is within the urban neighborhood and the other being a larger commercial center located on West Highway.

The **Purpose** of this project is to maintain this important infrastructure by constructing a new roadway surface along these limits.

The **Need** for this project is that the pavement is rated in fair/poor condition and this overlay must be done within the next few years so that it will not fall into a worse condition and require complete reconstruction, which will cost much more.

Careful consideration should be given when describing purposes for proposed actions. Items cannot be included in the purpose and need statement for the sake of increasing substance. For example, “the purpose of this project is to increase capacity, improve safety and modal interrelationships.” If data is only available to support the need to increase capacity, safety and modal interrelationships should not be included in the purpose and need statement. Only purposes that have supporting data and factual information should be included in the purpose and need statement.

In addition the use of charts, tables, maps, and other illustrations (e.g., typical cross-section, photographs, etc.) are encouraged as useful presentation techniques.

### **Additional Points:**

As stated earlier, this document is intended to create a uniform approach when developing purpose and need statements. However, agencies involved in the purpose and need development are encouraged to read and use the sources below in further understanding purpose and need. For any questions in reference to the development of this document you

can contact Connie Porter Betts at DOTD Connie Porter [connie.porter@la.gov](mailto:connie.porter@la.gov) or Brandon A. Buckner at FHWA [brandon.buckner@dot.gov](mailto:brandon.buckner@dot.gov) .

#### References:

- **40 CFR Part 1500-1508** (CEQ Regulations for Implementing NEPA) & **23 CFR 771** (FHWA – Environmental Impacts and Related Procedures)  
<http://www.environment.fhwa.dot.gov/projdev/pd2implement.asp>
- **FHWA Technical Advisory T 6640.8A**  
<http://environment.fhwa.dot.gov/projdev/impta6640.asp>
- **23 CFR Appendix A to Part 450** (Linking the Transportation Planning and NEPA Processes)  
<http://www.gpo.gov/fdsys/pkg/CFR-2012-title23-vol1/pdf/CFR-2012-title23-vol1-part450-appA.pdf>
- **FHWA Environmental Guidebook**  
<http://www.environment.fhwa.dot.gov/guidebook/index.asp>
- **40 Most Asked Questions Concerning CEQ's NEPA Re40 Most Asked Questions Concerning CEQ's NEPA Regulations**  
<http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>
- **FHWA Environmental Review Toolkit**  
<http://www.environment.fhwa.dot.gov/projdev/tdmelements.asp>
- **Federal Aid Essentials for Local Public Agencies**  
<http://www.fhwa.dot.gov/federal-aidessentials/catmod.cfm?id=41>
- **AASHTO Practitioner's Handbook** (Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects)  
<http://www.environment.transportation.org/pdf/programs/PG07.pdf>