

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

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

Date: March 2024

Background and Importance:

When applying for federal funding through the LDOTD, a Local Public Agency (LPA) needs to submit a project application or a Stage 0 (Feasibility Study) to LDOTD. Both the application and the Stage 0 documents are considered Planning documents. The purpose of this document is to explain how the Planning documents should be written in order to ensure planning information is carried forward into the National Environmental Policy Act (NEPA) process.

Nationally there is a strong interest towards shortening the project delivery process through “Planning and Environment Linkages”. LDOTD 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.”

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 LDOTD/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 preliminary purpose and need statements in Planning that will then be finalized during NEPA.

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 for 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 items 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 projected 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 the list above is intended to be used as a guide and should not be considered all-inclusive.

Importance of Preliminary Purpose and Need in the Planning Process:

During the planning process if a well thought out preliminary purpose and need are developed, the project application and future scope will be better defined. It should be noted that a purpose and need statement will only be **preliminary** at the end of the planning process because the final purpose and need of a project will be developed during the NEPA process (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 preliminary purpose and need. The LDOTD Stage 0 checklists can be a useful tool for documenting this information.

Developing the Preliminary 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 preliminary purpose and need statement sets the stage for the identification and evaluation of reasonable project alternatives and ultimately the selection of a preferred alternative during the NEPA process.

- ▶ **A. The Preliminary Purpose** – Defines the transportation problem 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 – Provides data to support the problem statement (purpose). In addition, the need describes the key issues and the cause of those issues 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 an issue exists). From the purpose example above, “The purpose of this project is to increase capacity of the roadway due to the projected major increase in future traffic volumes”; the need can be demonstrated with current congestion conditions, projected future traffic volume data in tables and graphs as well as referenced material such as prior studies that show projected traffic volume increase.

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 in the need statement 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. Project Location – Length with Project Beginning and End Points:

It is very important that the Project location, length and the project beginning and end points be provided in the Application and/or Stage 0 document. Then as the project moves into the NEPA process, these will become the logical termini for the project. The discussion of logical termini is very important in the development of purpose and need

statements as it defines the preliminary boundaries or end points for environmental documents. As part of the NEPA process, a decision must be made on what constitutes the geographic extent of a project. The term “logical termini” for project development refers to (1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts. The environmental impact review frequently covers a broader geographic area than the strict limits of the transportation improvements. The purpose and need of a proposed project/action should establish and justify logical termini.

General project location: The general boundaries of an area in need of physical improvements or other solutions to address transportation needs that is identified early in the state, MPO or local transportation planning process, before the project logical termini are established.

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 preliminary 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 & Preliminary Purpose and Need Statements:

1. **System Linkage** – When considering system linkage as a purpose there must be an underlying need for generating a connection/link such as, connection of existing transportation facilities, modal facilities, geographic areas, etc. How does the proposed connection fit in the existing transportation system?

Example – Red Road runs through the City of Green and connects several schools, shopping areas and medical facilities to the downtown area. Some sections of Red Road have sidewalks while others do not. In addition, 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 by completing missing gaps in their pedestrian system. It has identified Red Road as their first priority.

The preliminary **Purpose** of this project is to improve the pedestrian linkage along Red Road, so the entire length of the road is walkable for pedestrians of all ages. This will provide for improved connection and mobility to the city's schools, shopping areas, medical facilities and downtown.

The **Need** for this project was identified during the city's recent transportation plan update, which documented the sidewalk gaps and areas of repair needed along Red Road. This information can be found in the existing condition data section of their transportation plan.

- 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 preliminary **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 and traffic congestion, 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 and improve air quality.

The preliminary **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** – Legislation is rarely used in the primary purpose and need for the project. When using a Federal, State or local government mandate (in a law or resolution) to support the purpose and need for a proposed project/action, it is important to check the wording of the legislation or resolution for specific references to the project with respect to design, location, mode, etc. It is more appropriate to use legislation as a secondary purpose, especially if there is only a brief description of the project included in the legislation or resolution, as in the example below.

Example – Hwy 84 between Town A and Town B is currently a 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 for both passenger and freight. In addition, local and/or state political representatives were successful in getting additional funding for this project in legislation. The specific wording of the “earmarked” stated the funding should be used “to widen Hwy 84 to four lanes from its junction with Hwy 3037 to the junction of Hwy 124.” This wording must be considered in the development of this project.

The preliminary primary **Purpose** of this project is to increase capacity along Hwy 84 between Town A and Town B. The secondary **Purpose** is to ensure the “earmarked” funding is used “as directed in the earmark”.

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 growth without long-range transportation and land use 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 using adjacent available lands located in the southeast quadrant of the interchange has been proposed. ABC Consultants recently completed a study showing the proposed development can generate increases in annual sales tax revenue and provided potential alternatives for reducing congestion for both Parish Z and its town(s).

The preliminary **Purpose** of this project is to facilitate economic development by improving access to both developed and undeveloped lands located near the interchange, as well as improve the traffic operations for 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 growth in Parish Z and reduce transit times to area schools. Additionally, the congestion along the existing transportation network will be eased, supporting local businesses.

- 6. Modal Interrelationships** – The project purpose should provide an explanation of how a proposed project/action will interface with and serve to complement 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 – The River Port is expanding its facility to receive more goods. Hwy 10 connects the port to I-99. This two-lane road (Hwy 10) is currently at capacity and will not be able to accommodate the future freight traffic expected at the port.

The preliminary **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 on this section of road 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 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 preliminary **Purpose** of this project is to improve and enhance the safety of bicyclists and runners using this corridor.

The **Need**: Due to a 30% increase in bicyclists and runners in this area from 2010 to 2013, there is an increase in conflicts with vehicles. There were 2 serious injury

crashes in the past 3 years. The Anytown Police Department 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. To solve this problem, safety countermeasures will be installed.

The preliminary **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 and 50% were involving younger drivers, ages 16-19. 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 preliminary **Purpose** of this project is to preserve the roadway surface of this important infrastructure corridor.

The **Need** for this project is to prevent a complete and costly reconstruction of the road. Currently the pavement is rated in fair/poor condition. An overlay must be done within the next few years so that the road will not fall into worse condition, than requiring a complete reconstruction, which is much more expensive than a pavement overlay.

Careful consideration should be given when describing preliminary purposes for proposed actions. Items should not be included in the purpose and need statement just 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, then 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 provide guidance to create a uniform approach when developing preliminary purpose and need statements during the planning process. 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 LDOTD Connie Porter connie.porter@la.gov Laura Phillips at FHWA laura.phillips@dot.gov.

References:

- **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 Review Toolkit**
<http://www.environment.fhwa.dot.gov/guidebook/index.asp>
- **FHWA Environmental NEPA Transportation Decision Making**
<http://www.environment.fhwa.dot.gov/projdev/tdmelements.asp>
- **Federal Aid Essentials for Local Public Agencies**
<https://www.fhwa.dot.gov/federal-aidessentials/index.cfm>