

Planning and Environmental Linkages (PEL) Procedures



April 2024



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This PEL Procedures document is effective April 2024

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Abbreviations and Acronyms

- A -	
ADA	Americans with Disabilities Act
- C -	
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
- D -	
DEP	District Environmental Planner
DOT	Department of Transportation
- E -	
EA	Environmental Assessment
EDC	Every Day Counts
EIS	Environmental Impact Statement
ESA	Environmental Site Assessment
ESM	Environmental Services Manager
- F -	
FAST	Fixing America's Surface Transportation Act
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
- G -	
GHG	Greenhouse Gases
GIS	Geographic Information Systems
- H -	
HEP	Headquarters Environmental Planner
HQ	Headquarters
- I -	
IDEQ	Idaho Department of Environmental Quality
IDFG	Idaho Department of Fish and Game
IDL	Idaho Department of Lands
IDPR	Idaho Department of Parks and Recreation
IGA	Intergovernmental Agreement

IIJA	Infrastructure Investment and Jobs Act
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITD	Idaho Transportation Department
ITIP	Idaho Transportation Investment Program
- L -	
LOS	Level of Service
LPA	Local Participating Agency (ex: Ada County Highway District, Local Highway Technical Assistance Center, etc.)
- M -	
MAP-21	Moving Ahead for Progress in the 21st Century Act
MOE	Measures of Effectiveness
MPO	Metropolitan Planning Organization
- N -	
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NMFS	National Marine Fisheries Services
NRHP	National Register of Historic Places
- O -	
OFD	One Federal Decision
OTIS	Online Transportation Information System
- P -	
PA	Programmatic Agreements
PEL	Planning and Environmental Linkages
- R -	
ROD	Record of Decision
ROW	Right-of-Way
RTP	Regional Transportation Plan
- S -	
SAFETEA-LU	Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users
SHPO	Idaho State Historic Preservation Office or Idaho State Historic Preservation Officer
SLS	System Level Study
STIP	Statewide Transportation Improvement Program

- T -

TEA-21	Transportation Equity Act of the 21st Century
TIP	Transportation Improvement Program
TPR	Transportation Planning Region

- U -

USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
U.S.C	United States Code

- V -

V/C	Volume to capacity ratio
VHT	Vehicle Hours of Travel
VMT	Vehicle Miles of Travel



CHAPTER HIGHLIGHTS

- *PEL is a collaborative and integrated approach to transportation decision-making*
- *PEL doesn't reduce the level of NEPA analysis needed, but it may narrow and better define the scope of the subsequent NEPA study*
- *PEL doesn't replace state or metropolitan planning processes, rather they are an approach for documenting planning information and reducing the duplication of efforts*



INTRODUCTION TO THE PEL PROCESS

The Idaho Transportation Department (ITD) developed this Planning and Environmental Linkages (PEL) Procedure document (Procedures document) in coordination with the Federal Highway Administration (FHWA) to provide guidance on the PEL study process in Idaho. The goal of PEL studies is to gather feedback and information during planning to inform the environmental review process, including the National Environmental Policy Act (NEPA).

This Procedures document provides ITD staff, as well as local governments (cities/counties/highway districts/LHTAC), regional and metropolitan planning agencies, and consultants, guidance on developing and carrying out PEL studies for transportation projects that intend to pursue future federal transportation funding in Idaho. It provides recommendations and best practices but is not regulatory. It is assumed the professionals using this Procedures document will have experience in the field of transportation planning and the NEPA process. Guidance related to federal requirements for transportation planning and NEPA are referenced but not detailed here, nor does anything in this Procedures document supersede ITD or FHWA regulations or guidance on planning or NEPA. All federal funded FHWA and FTA PEL projects are encouraged to use this Procedures document.

This Procedures document and the practices outlined within are updated as needed to capture changes in guidance and processes based on PEL study experiences.

1.1 What is the PEL Process?

Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals and impacts early in the transportation planning process, and 2) uses the information, analysis, and products

developed during planning to inform the subsequent environmental review process.

1.2 Why do a PEL?






PEL studies can help inform planning decisions and serve as a platform for stakeholders to discuss and prioritize transportation issues and project implementation. A PEL doesn't reduce the level of NEPA analysis needed, but it may narrow and better define the scope of the subsequent NEPA study. Depending on the contents and objectives of the PEL study, benefits may include:

- Building on decisions and information developed during the planning process to inform NEPA.
- Developing a purpose and need statement that provides the foundation for alternatives development and screening.
- Identifying, engaging, and building collaborative working relationships with affected jurisdictions, resource agencies, and the public by enhancing participation and coordination efforts throughout the planning process.
- Identifying key environmental resources (e.g., resources that may require avoidance or minimization of impacts during alternatives development; or resources with lengthy environmental clearance processes that could affect the project schedule and budget) and encouraging environmental stewardship by incorporating environmental analysis and mitigation in the planning process.
- Assisting with the NEPA Class of Action determination (Categorical Exclusion [CE], Environmental Assessment [EA], Environmental Impact Statement [EIS]) prior to project development.
- Developing Programmatic Agreements (PA) with resource agencies, as applicable, by early analysis of environmental resources.
- Identifying logical termini and project sections with independent utility and recommending a project phasing and action plan.
- Provides stakeholders a plan they can use to base decisions on such as land use, development, and preservation of right-of-way (ROW).
- Can lead to other beneficial studies and plans, such as Access Management Plans, Access Control Plans, and ROW Mapping and Surveying.

1.3 Reasons Not to Conduct a PEL Study

Sometimes projects or corridors are not well suited to a PEL study because of timing, funding, or other considerations (Table 1). PEL studies can be expensive and may not be useful if projects are too far into the future.

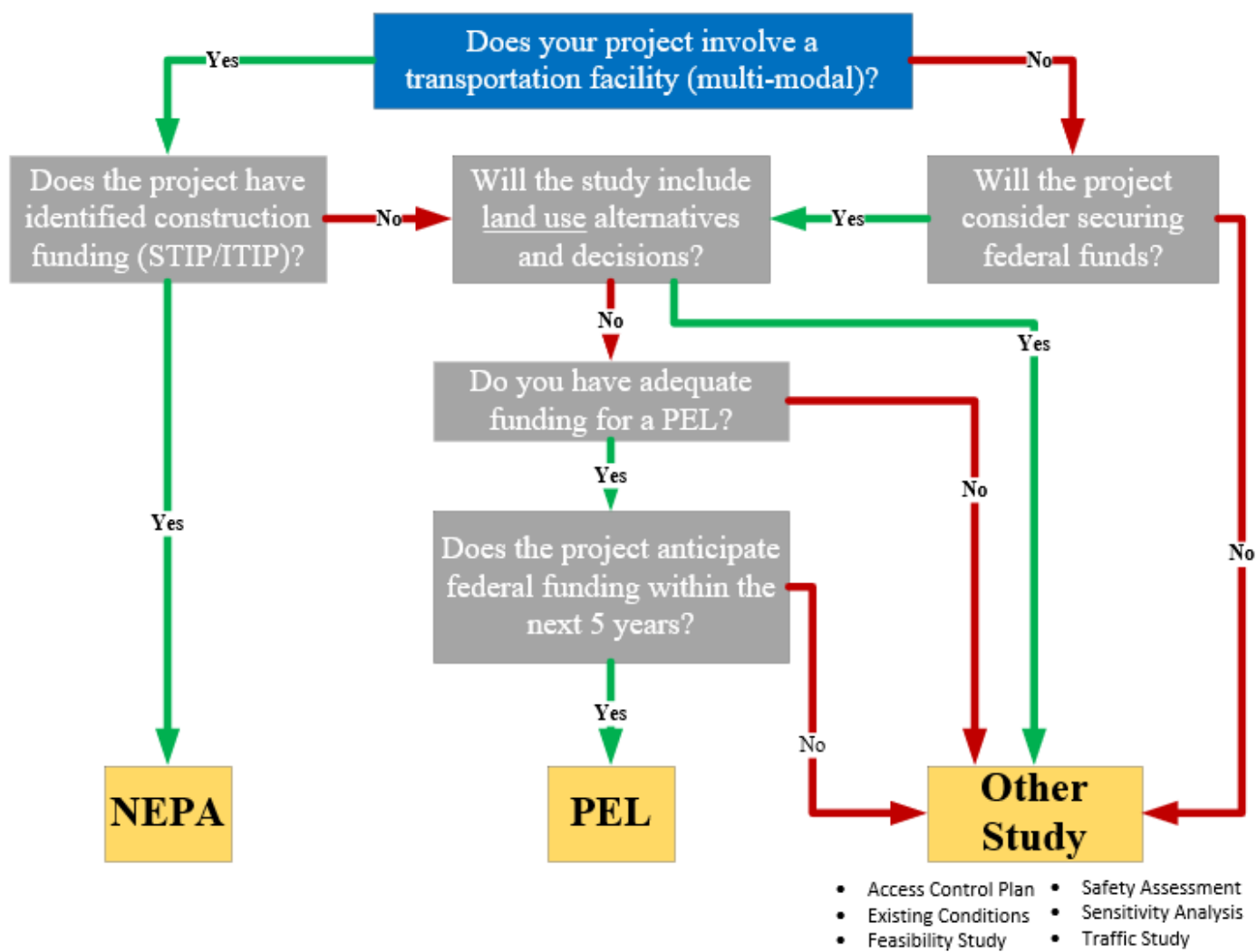
Table 1: When a PEL Study Should Not Be Initiated

If a project has final design, ROW acquisition, and/or construction funding.		NO: It makes more sense for the NEPA process to be initiated rather than a PEL process.
If the transportation improvement solution is obvious.		NO: One of the primary reasons for a PEL study is to clarify the need for a transportation improvement and what appears to be the best solution. If the latter question has already been resolved, and if funding is available, it makes sense to proceed into the NEPA process.
If other types of studies can provide the information needed in a less expensive manner.		NO: It may be that a sub-area plan or access plan is a simpler way to develop information needed and can proceed with more efficient agency or public coordination.
If it will be more than 5 years between the end of the PEL study and the beginning of the NEPA process.		MAYBE: If PEL is over 5 years old, alternatives analysis and any changes in conditions will require updates to the PEL before moving into NEPA.
If the sole reason for the PEL study is to secure federal funding.		NO: Completion of a PEL study does not guarantee federal funding for a project.

For example, PEL studies should not be conducted when:

- The lead agency is unsure of the reason for the study.
- Solutions (alternatives) have already been identified (in this case, the project should conduct a feasibility study or start the NEPA process if funding is available).
- The project does not have potential federal involvement or federal funding.
- The lead agency is unlikely to initiate the NEPA process within 5 years of completion of the PEL study.
- Other types of studies will provide the information needed, such as access plans, a traffic study, or an existing conditions overview. Figure 1 is a decision matrix to help determine the appropriate study.
- The project has construction funding (in this case, the project should start the NEPA process).
- A PEL study does not reduce the level of analysis required for decision-making under NEPA. PEL studies should not be conducted with the intent of minimizing or short-cutting NEPA requirements or of “downgrading” a NEPA Class of Action from an EA to a CE. Although the PEL process is a federally recognized process for streamlining the NEPA process, the completion of a PEL study does not guarantee federal funding for a project. PEL studies should not be conducted for the primary purpose of securing federal funding.

Figure 1: Study Decision Matrix¹: NEPA, PEL, or Other



¹ A PEL study should be transportation focused. The PEL process should not be used to make land use decisions other than preserving a corridor for transportation. Please note corridor preservation or early acquisition is not eligible for federal reimbursement in Idaho.



CHAPTER HIGHLIGHTS

- *PEL studies intended to be adopted in the NEPA process, must adhere to legal requirements*
- *Completing the FHWA PEL Questionnaire is required as part of the PEL process*
- *The ITD PEL Resource List assists with evaluating what environmental resources need to be considered in the PEL process*

2

PEL PROCESS GUIDANCE AND RESOURCES

Use of the PEL process is not a legal requirement for project development. However, if PEL study results are to be adopted in the NEPA process, the PEL study must adhere to legal requirements and published guidance, including this Procedures document. Be aware that current regulations and existing conditions can change

between the time the PEL is completed and the time when funding is secured to begin the NEPA process for a project.

2.1 Summary of Major Provisions in Statutes and Regulations

23 U.S.C. 168 allows a lead federal agency or cooperating agency with responsibility under federal law to adopt or incorporate by reference planning products² developed during a planning study in a subsequent environmental review process (NEPA or other environmental permit, approval, review, or study required for a project under any other federal law).

The law specifies the following types of planning decisions and products: if any tolling or financial measures are necessary, general travel corridor or modal choice, purpose and need, preliminary screening of alternatives and elimination of unreasonable alternatives, basic description of the environmental setting, decision with respect to methodologies for analysis, and a programmatic mitigation plan.

The law specifies the following planning analyses: travel demands, regional development and growth, local land use, growth management and development, population and employment, potential effects, and

² A planning product is defined as a decision, analysis, study, or other documented information that is the result of an evaluation or decision-making process carried out by a metropolitan planning organization or a State.

mitigation needs.

Ten conditions must be met for the relevant agency to adopt or incorporate planning products in an environmental review process (including NEPA, permit, review, or approval):

1. The planning product was developed through a planning process conducted pursuant to applicable federal law.
2. The planning product was developed in consultation with appropriate federal and state resource agencies and Indian tribes.
3. The planning process included broad multidisciplinary consideration of systems-level or corridor-wide transportation needs and potential effects, including effects on the human and natural environment.
4. During the planning process, public notice was provided that the planning products produced may be adopted during a subsequent environmental review process.
5. After initiation of an environmental review process, but prior to determining whether to use planning products, the lead agency must have made documentation and the intent to adopt this documentation available for review by the general public, agencies, and tribal governments, and considered any comments.
6. There is no significant new information or new circumstances that have a reasonable likelihood of affecting the continued validity or appropriateness of the planning product.
7. The planning product has a rational basis and is based on reliable and reasonably current data and reasonable and scientifically acceptable methodologies.
8. The planning product is documented in sufficient detail to support the decision or results of the analysis and to meet requirements for use in the environmental review process.
9. The planning product is appropriate for adoption or incorporation by reference and use in the environmental review process.
10. The study was approved no later than 5 years prior to the date on which information is adopted in the NEPA review.

23 U.S.C. 139 (f)(4)(E) allows the federal department of transportation (DOT), state DOT, or local governmental entity to eliminate alternatives developed during a metropolitan or state planning process from detailed consideration in a subsequent Environmental Impact Statement (EIS) prepared under NEPA, as long as:

- The planning process followed guidance on the requirements of NEPA and any other federal law necessary for approval of the project. This includes any permit, approval, review, or study required for a project for any federal law.
- The planning process included an opportunity for public review and comment.
- The applicable planning agency rejected the alternative after considering public comments.
- The federal lead agency independently reviewed the alternatives evaluation.
- The federal lead agency determined that the alternative to be eliminated is not necessary for compliance with NEPA or determined, with the concurrence of federal agencies, that the alternative to be eliminated is not necessary for any permit or approval under any other federal

law.

23 CFR 450.212 and **450.318** allow a state DOT, a metropolitan planning organization (MPO), or public transportation operator to undertake a planning study that produces:

- A purpose and need (or goals and objectives) statement.
- A general travel corridor or mode.
- Preliminary screening of alternatives and elimination of unreasonable alternatives.
- A basic description of the environmental setting, and/or.
- Preliminary identification of environmental impacts and environmental mitigation.

For the purposes of the regulations, a “planning study” can be a corridor or subarea study, or it can be a PEL study.

The regulations also allow publicly available documents or other source material produced by or in support of the transportation planning process to be incorporated directly or by reference into subsequent NEPA documents if:

- The NEPA lead agencies agree that such incorporation will aid in establishing or evaluating purpose and need, reasonable alternatives, cumulative or other impacts on the human and natural environment, or mitigation of these impacts;
- The planning study was conducted with the involvement of interested state, local, tribal, and federal agencies;
- The documents underwent public review with reasonable opportunity to comment;
- The documents were in a form that is identifiable and available for review during the NEPA scoping process and can be appended or referenced in the NEPA document; and
- The documents were reviewed by FHWA or were reviewed by Federal Transit Administration (FTA).

2.2 FHWA and FTA PEL Guidance

On April 5, 2011, FHWA issued *Guidance on Using Corridor and Subarea Planning to Inform NEPA* (FHWA, 2011a). This guidance document describes how corridor and subarea planning can be used to connect transportation planning and the NEPA processes as described in Appendix A of 23 CFR 450 – Linking the Transportation Planning and NEPA Processes. Chapter 4.0 of *Guidance on Using Corridor and Subarea Planning to Inform NEPA* (FHWA, 2011a) focuses on elements that make a planning study viable for NEPA, including information on environmental analysis and documentation, and Appendix B of that document contains useful case studies.

The PEL Process and Every Day Counts Initiative

In 2009, FHWA introduced the Every Day Counts (EDC) initiative to identify and deploy innovations that shorten project delivery, enhance roadway safety, and protect the environment. The PEL process is an EDC initiative that encourages the use of information developed in planning to inform the NEPA process. To be used in NEPA, a PEL study must involve interested state, local, tribal, and federal agencies, as well as the public. Decisions are to be documented in an identifiable format (e.g. the PEL Questionnaire) and made available for public review during the NEPA scoping process. PEL documentation can be appended

to or referenced in the NEPA document. The legal authority to use planning information in the NEPA process was explicitly clarified in the Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users (SAFETEA-LU), including flexibility in agency funding choices, and has subsequently been included in current law.

FHWA PEL Questionnaire

To aid agencies in incorporating PEL principles into their planning and environmental review processes, FHWA introduced the PEL Questionnaire to ensure that planning information and decisions are properly documented for use in the NEPA review process. ITD has adopted the FHWA PEL Questionnaire which is provided on ITD letterhead (Appendix A).

ITD PEL Resource List

The ITD PEL Resource List is available for the project team when evaluating what environmental resources need to be considered in the PEL process. The list can be found in Appendix B of this PEL Procedures document.



CHAPTER HIGHLIGHTS

- *The PEL process can result in the development of the purpose and need, recommended alternative(s) to carry forward to NEPA, stakeholder identification, identification of key concerns, and project prioritization*
- *The importance of involving the lead federal agency and soliciting public involvement from resource agencies and the public*
- *The PEL process requires at least four FHWA Coordination Points*

3

HOW TO CONDUCT A PEL STUDY

Previous chapters have described what the PEL process is and why a PEL study might be conducted. This chapter provides guidance on how to conduct a PEL study consistent with FHWA and FTA guidance. Studies that transition into project development and NEPA are most common and are discussed in detail in this chapter. PEL studies are inherently flexible and can be used for individual projects. The PEL process can result in the development of the purpose and need, recommend alternative(s) to carry forward to NEPA, stakeholder identification, identification of key concerns, and project prioritization.

PEL studies can also be smaller efforts that look at just one or two elements of planning or NEPA, such as determining logical termini or completing a FHWA PEL Scoping Form and conducting an environmental scan of environmental resources that could affect the alternatives development and screening process. In general, PEL studies should include some or all of the following steps:

- Determine the reason for the PEL study (Vision, Goals, and Objectives)
- Develop a project scope
- Determine lead federal agency (FHWA/FTA) and ITD involvement
- Identify stakeholders and participation methods
- Conduct all or individual PEL study steps outlined in the project scope
 - Purpose and Need
 - Operations Analysis Methods and Assumptions
 - Operations Analysis Technical Report

- Alternatives Development and Screening Technical Report
- Existing Conditions and Environmental Scan Report
- Recommended Alternative(s)
- Action Plan
- Early Actions and Early Action Projects
- Identify next steps

Unlike other transportation planning studies, a PEL study entails specific actions. A PEL study needs to do the following:

- Involve lead federal agency (FHWA/FTA)
- Use the PEL Questionnaire to guide and document the study
- Solicit public input
- Solicit interested party and stakeholder input
- Solicit resource agency input
- Obtain study acceptance letters from ITD Headquarters (HQ) Environmental Services Manager (ESM) and the lead federal agency (FHWA Idaho Division Office/FTA).

3.1 Determine the Reason for the PEL Study

After following the decision-matrix depicted in Figure 2 and deciding that a PEL study is the appropriate study, the first step in the process is deciding the reason for the PEL study:

- What are the objectives of the study?
- What are the desired outcomes?
- What are the expected uses of the PEL study?

A PEL study can address project-related needs. Reasons for a PEL study might include prioritizing improvements along a corridor and developing a range of alternatives to consider.

Prior to initiating the PEL study, the ITD District, local agency (if the study is a local agency project), or MPO (if the study is located within a Metropolitan Planning Area) should hold a meeting with FHWA Idaho Division Office and the ITD HQ ESM to confirm the project is suitable for PEL and clarify the reason for conducting the study. This meeting will help determine whether the PEL process is the appropriate method to study the issues being considered or whether another type of study or planning process would be more appropriate.

For those studies suited to the PEL process, the pre-scoping meeting should determine which steps in Section 3.5 will be addressed by the study. Once the reason for the PEL study has been determined a scope of work can be developed. The District shall involve the FHWA Idaho Division Office and all ITD Program areas (Bridge, Traffic, etc.), including HQ Environmental Services, as early as possible to facilitate a smooth scoping process. The goal of implementing this process is to draft more comprehensive scopes of work, requests for proposals, and ultimately, better focus on the PEL study.

A PEL study is not intended as a substitute for the NEPA process but is a way to streamline the NEPA

process and focus project development to make more informed decisions during NEPA. Identifying priorities through the PEL process helps coordinate planning efforts across jurisdictions, provides a useful tool to identify political needs and desires, and gives context to an area without intensive studies often required for the NEPA process.

3.2 Develop and Understand the Scope of Work

Once the decision has been made that a PEL study is appropriate, the ITD District and/or local agency or MPO assigns a Project Manager (PM), who is responsible for developing a scope of work for the PEL study. The PM guides the project through the remainder of the process. The PM is required to include the District Environmental Planner (DEP), the HQ ESM, other ITD Program areas (as warranted) and the FHWA Idaho Division Office in scoping the project, developing a scope of work, and tracking documentation or project milestones. Early coordination will reduce the potential for time delays, increased costs, and changes to a project.

An internal ITD project team meeting with the PM, DEP, HQ ESM, Traffic, other ITD Program areas, and the FHWA Idaho Division Office is recommended for preparation and review of a project-specific scope of work. The PEL Questionnaire can be a useful tool when developing the project-specific scope of work. The PEL Questionnaire provides a practical framework for identifying the work to be completed during a PEL study and can also be used to chart progress through the study.

The PEL Questionnaire requests that lead agencies decide at the start of a PEL study how the work may later be incorporated into subsequent NEPA efforts and what is needed in the PEL study to meet standards established by NEPA regulations and guidance. These decisions should be considered when developing the scope of work.

The project-specific scope of work may include items such as the following:

- Define and refine the travel corridor.
- Identify the appropriate travel demand model, existing and future transportation system, and affected environment at an appropriate level of detail.
- Develop the methodology for and conduct the operations analysis (traffic, transit, bicycle, pedestrian, and safety).
- Prepare a purpose and need statement.
- Develop and evaluate alternatives.
- Prepare documents consistent with the requirements presented in Chapter 4.0 so that information developed can be appended or referenced in a NEPA document.
- Conduct outreach to the public.
- Coordinate with resource agencies about resource conditions and study results.
- Coordinate with local stakeholders (such as municipalities and counties).
- Coordinate with FHWA Idaho Division Office at the Coordination Points presented in Section 3.3.1 (Figure 2).

FHWA does not require an action plan identifying the potential funding, phasing, and prioritization of the project as part of the PEL study. However, action plans are useful in preparation for project delivery and

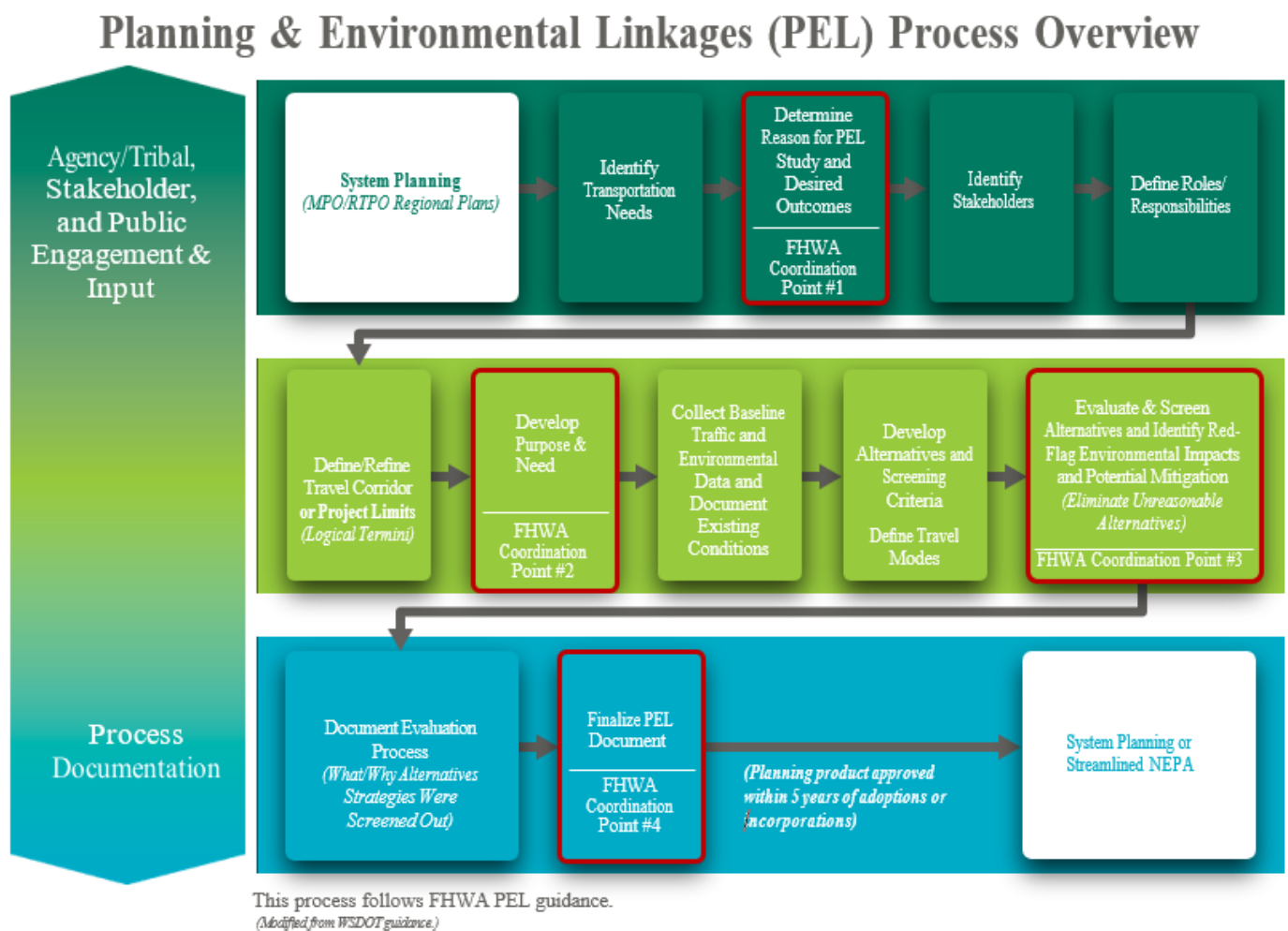
may be included in the project-specific scope of work at the discretion of the project sponsor.

3.3 Determine Who Will Be Involved in the Study

3.3.1 FHWA³ Involvement in ITD-Led PEL Studies

FHWA involvement in PEL studies is required for projects that have a federal nexus and are likely to require compliance with NEPA in the future. Although the PEL process is voluntary and flexible, certain steps and Coordination Points are required for the PEL study to be incorporated into the NEPA process. FHWA sometimes participates in planning activities throughout the PEL study process, but in all cases, PEL studies are required to involve FHWA at four formal Coordination Points (Figure 2). Coordination Points are touch points that confirm the progress to date, review any issues or concerns, agree with the action completed, and lay out steps to the next Coordination Point. The Coordination Points are intended to help reduce delay in the overall study review process (to avoid back tracking) and to facilitate future NEPA processes by ensuring that required elements for incorporating the PEL study into future NEPA processes are included.

Figure 2: PEL Overview and Coordination Points



³ Where FHWA is identified throughout this document, replace with FTA if it is an FTA project.

The following four FHWA Coordination Points are required for PEL processes:

- Coordination Point 1 — Determine Reason for PEL Study and Desired Outcomes
- Coordination Point 2 — Purpose and Need and Operations Analysis Methodology
- Coordination Point 3 — Alternatives Development and Screening
- Coordination Point 4 — PEL Document (draft and final review)

Each Coordination Point coincides with a project milestone and is summarized below. Documentation of FHWA Idaho Division Office and ITD HQ ESM reviews, acknowledgement of deliverables and agreement of Coordination Points 1, 2, and 3 can be informally recorded as a written document. Coordination Point 4 requires an acceptance letter from ITD HQ ESM and the FHWA Idaho Division Office. Appendix C contains sample FHWA and ITD HQ ESM acceptance letters for completion of a PEL study.

If only individual components of a PEL study are being completed, acceptance letters from ITD and FHWA may be warranted to provide formal acknowledgement of the component completion. The need for acceptance letters should be determined as part of Coordination Point 1 for the completion of individual components of a PEL study.

Coordination Point 1 — Determine the Reason for the PEL Study and Desired Outcomes

Coordination Point 1 provides an opportunity for FHWA to give input on the reason for the study and the ITD HQ ESM to give input on the purpose and scope of the PEL study before developing the scope of work. Reviewing the reasons for and expected outcomes of the PEL study are important for determining which portions of the PEL Questionnaire are applicable in the documentation, which, in turn, guides the project-specific scope of work.

Coordination Point 2 — Purpose and Need and Operations Analysis Methodology

Coordination Point 2 provides an opportunity for FHWA and ITD Program areas to provide input on the vision, goals and objectives, purpose and need statement, and Operations Analysis Methodology for the study. It will be revised based on this input, as appropriate.

Coordination Point 3 — Alternatives Development and Screening

Coordination Point 3 ensures FHWA has an opportunity to provide input during alternatives development, refinement, screening, and the recommendation of alternative(s) to be evaluated in future NEPA documentation. The output of Coordination Point 3 will be a decision on:

- Appropriate methodologies to be used and the level of detail (qualitative and/or quantitative) required in the alternatives screening process (see Section 3.5.7).
- Development of screening criteria and performance measures for the alternatives screening process based on the purpose and need, objectives, and goals.
- Elimination of alternatives that:
 - Do not meet purpose and need or
 - Due to the magnitude of a combination of negative impacts on the community and environmental and cultural resources when there is another alternative that meets purpose and need and avoids or minimizes these impacts

- Identification of alternatives to:
 - Be recommended to be carried forward in the alternatives screening
 - Not be recommended to be carried forward due to the magnitude of negative impacts on the community, environmental, or cultural resources or a lack of support by the local agencies or when there is another alternative that better meets the purpose and need
- Documentation of alternatives development, screening, and refinement of the decision-making process.

Coordination Point 4 — PEL Document (draft and final review)



Based on the inputs of Coordination Points 1, 2, and 3, a PEL study document will be prepared. The output of Coordination Point 4 will be coordination on:

- Adequacy of the document for incorporation into future NEPA processes.
- Specification for changes or additional information needed for the final document.
- Recommendations for future projects and/or NEPA processes that may arise from the PEL study.

At the conclusion of Coordination Point 4, formal acceptance letters shall be obtained from ITD HQ ESM and FHWA Idaho Division Office to document FHWA’s involvement with the study (Appendix C). The acceptance letter will document the accomplishments of the PEL study, final deliverables, next steps necessary for the project to move forward into NEPA, and acknowledgement of the decisions made in the PEL study.

Figure 2 identifies the standard FHWA coordination points during PEL study development. Note that due to the flexibility of the PEL process, not every PEL study will produce the same products or outcomes. The PEL project team must consult with the ITD HQ ESM and the FHWA Idaho Division Office at the beginning of the process to determine whether each of the standard PEL coordination points shown in Figure 3 apply to a particular PEL study.

Figure 3: FHWA Written Coordination Points

FHWA WRITTEN COORDINATION POINTS DURING PEL STUDY		
COORDINATION POINT	REVIEW	
 Reason for PEL Study and Desired Outcomes	<ul style="list-style-type: none"> • Reasons for PEL are reasonable and rational • Clear vision, goals, and objectives 	
 Purpose and Need and Operations Analysis Methodology	<ul style="list-style-type: none"> • Purpose and need statement has a rational basis • Uses up to date data • Includes analytical methods • Uses modeling techniques that are reliable, defensible, reasonably current, and meet data quality requirements • Appropriate methodologies are identified 	



Alternatives Development and Screening and Results

- Planned range of alternatives and the alternatives development process is reasonable, rational, and logical
- Level of detail planned for alternatives development and screening is appropriate
- Stakeholder involvement plan is appropriate
- Planned screening process, including screening criteria, is rational and logical
- Results of alternatives development and screening process
- Conclusions are reasonable and logical
- Sufficient documentation is provided to justify eliminating or advancing alternatives
- No alternatives are eliminated that are necessary for compliance with future NEPA or for compliance with a permit or approval from another federal agency⁴



Final PEL Study

- Public and agency involvement is adequately documented
- The ten conditions identified in 23 U.S.C. 168 have been followed
- Planning products and analyses are adequate for incorporation into future NEPA
- Impacts and mitigation are appropriately documented
- The basic description of the environmental setting is adequate
- The implementation plan contains reasonable steps for the project to move forward into the NEPA process
- The planning products are documented in such a form as to be easily identifiable and available for review during the NEPA scoping process and can be appended to or referenced into a NEPA document

3.3.2 FHWA and ITD Involvement in Agency PEL Studies

When a local agency decides to conduct a PEL study, the local agency must hold a meeting with the local Highway District, the MPO (if within the MPO boundary), the ITD District, the ITD HQ ESM, and the FHWA Idaho Division Office to determine the reasons for and expected outcomes of the study and the appropriateness of the PEL process to meet those objectives. This constitutes Coordination Point 1 — Determining the Reason for the PEL Study. Additional Coordination Point requirements will be determined as part of the pre-scoping meeting.

3.4 Identify Stakeholders and Participation Methods

Similar to the ITD planning and NEPA processes, stakeholder involvement is a key component of the PEL process that encourages stakeholder participation in the decision-making process from conception to completion. The goal of a stakeholder involvement program is to provide appropriate involvement throughout the process and solicit community feedback on steps such as the purpose and need statement, alternatives development, the alternatives screening process, environmental analysis, and mitigation strategies. This section provides guidance on stakeholder involvement and key Coordination Points for ITD PEL studies. It is not intended to cover public involvement requirements related to other state, federal, local, or tribal laws and regulations.

⁴ An example of this would be for the USACE 404b1 process that is needed if there is an individual 404 permit needed for project construction.

At a minimum, stakeholders, especially the public, should be engaged and provided an opportunity to review and provide input on:

- Draft Purpose and Need Statement.
- Alternatives Development and Screening process and results, including the Recommended Alternative(s).

Stakeholder involvement for a PEL study should be focused, developed to manage public expectations, and not overcommit due to the planning-level of analysis and time required for a construction project to be developed from a PEL study.

3.4.1 Identify Stakeholders and Interested Parties

Project

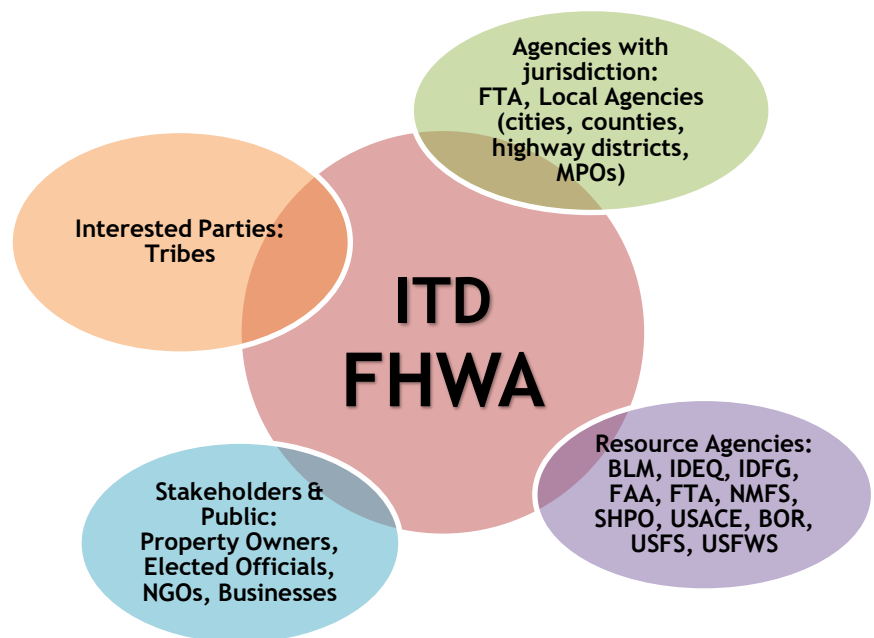
Figure 4: Example of PEL Study Stakeholders

Early and continuous stakeholder engagement is a key to a successful PEL study. Stakeholders and interested parties can include the general public, businesses, government agencies, tribes, non-government organizations, and other groups with an interest in the PEL study (Figure 4). The range of stakeholders is not limited to the geographic jurisdiction of the study but includes all individuals/groups that may potentially be affected by the project. These stakeholders will vary in composition depending on the size of the PEL study and the questions being asked or addressed by the PEL study. Stakeholder participation helps acceptance of the overall study and

recommendations that come out of the study. Stakeholder involvement also fosters relationship building within agencies, between agencies, and with the public. Therefore, one of the top priorities during the PEL process is to identify stakeholders, which can be accomplished by talking to key decision-makers within the study area.

FHWA and ITD have standing relationships with federal, state, tribal, and local resource agencies. Unlike NEPA, agency involvement in a PEL study is voluntary.

If a PEL study will identify and evaluate environmental resources, all federal, state, tribal, and local agencies with jurisdiction by law or special expertise regarding issues related to the PEL study should be notified of the study once it begins. This notification typically takes the form of a letter from ITD (Appendix C) introducing the study, providing the opportunity to ask questions about the study, and informing agencies that ITD will request additional input when the Existing Conditions and Environmental Scan Report is available. Appendix C contains examples of the Coordination letters



between ITD and the resource agencies.

Earlier PEL studies requested resource agencies provide comments early in the study process, but practice has shown that agencies provide the most effective comments when they are able to comment on an Existing Conditions and Environmental Scan Report. The Existing Conditions and Environmental Scan Report provides the existing conditions and a high-level analysis of potential resource concerns. Agencies should be invited to participate in the process through review and comments on the draft Existing Conditions and Environmental Scan Report. Website links to examples of Existing Conditions and Environmental Scan Reports are available in Appendix D.

Resource and Regulatory Agencies

Regulatory and/or resource agencies to consider including, but are not limited to, the following:

- Idaho Department of Environmental Quality (IDEQ)
- Idaho Department of Fish and Game (IDFG)
- Idaho State Historic Preservation Officer (SHPO)
- Idaho Department of Parks and Recreation (IDPR)
- Idaho Department of Lands (IDL)
- National Marine Fisheries Service (NMFS)
- U.S. Army Corps of Engineers (USACE)
- U.S. Bureau of Land Management (BLM)
- U.S. Bureau of Reclamation (BOR)
- U.S. Environmental Protection Agency (EPA)
- U.S. Fish and Wildlife Service (USFWS)
- U.S. Forest Service (USFS)

Coordination with resource and regulatory agencies is necessary to confirm all applicable constraints (and the severity of those constraints) have been recorded during the process. The coordination opportunities are generally project-specific and vary in intensity for different resource and regulatory agencies based on the scope and breadth of issues within a given study area. However, if agencies choose not to provide input, the PEL products can still be carried forward into the NEPA process with the recognition that additional coordination will likely be required during the NEPA phase.

All coordination and consultation with SHPO and Tribal Historic Preservation Offices (THPOs) and/or the Tribes should occur through HQ Environmental Services, ITD HQ Cultural Resources staff, not from the project team — no exceptions. All other resource coordination and consultation with state or federal partners shall be conducted by the DEP, HEP or the ITD PM, not the consultant (if applicable).

Resource agencies can provide specific technical expertise and regulatory oversight on various environmental issues and potential project impacts. All agencies with expertise or jurisdiction related to the PEL study should be invited to provide comments on the Existing Conditions and Environmental Scan Report during the PEL process and should be sent the final PEL document and information about next steps.

The final PEL document should be sent to the resource agencies upon lead agency acceptance.

➤ **Federal Resource Permitting Agencies**

The roles of federal resource and permitting agencies are particularly important because decisions will be made in the PEL process that affect the future NEPA and permitting phases of a project. Planning products developed during a PEL process are intended to be adopted or refined for future environmental review processes. Federal agencies who have a statutory role related to a particular resource are urged to stay involved in a PEL process to ensure that decisions made can be carried forward in compliance with a particular law or regulation that protects that resource. If a federal agency intends to use one of the planning products (e.g., purpose and need, elimination of alternatives, recommendation of alternatives, environmental resource data) to issue a permit, review, or approve the project, the federal agency must concur that the ten conditions listed in 23 U.S.C. 168(d) have been met during the PEL process.

➤ **State Resource Permitting Agencies**

State resource and permitting agencies are critical to PEL studies, especially if any resources under their jurisdiction are likely to be impacted by a future project. Similar to federal agencies, if any state agencies have a statutory role related to a particular resource, they are urged to stay involved in a PEL process to enable decisions to be carried forward into NEPA (or other environmental review processes such as Section 106 of the National Historic Preservation Act) in compliance with a law or regulation that protects that resource.

Local Agencies

At the start of a PEL study, any local agencies that might be impacted by the project should be invited to participate. These agencies provide vital information concerning existing and future land uses and transportation-related data. Also, coordination with the surrounding local agencies helps support the overall study results and the decision-making process, which transitions into future NEPA processes. In some cases, local agencies will be the lead for the PEL study, and their participation will be more significant as the project sponsor.

Public

Including the public at the start of the PEL process helps to identify issues, attempts to provide more information about the overall study and understanding of recommendations that come out of the study, and fosters relationships with the public.

Tribal Governments

Tribal governments have a role specified in statute (23 U.S.C. 168) and regulation (23 CFR 450.212), and are to be invited to and, if desired, involved in the PEL process. Tribal governments should be involved because they may have expertise in environmental resource data collection, land use development, other plans for areas being studied, and development of the planning products during the PEL process. Tribal member involvement during the PEL process is not considered formal government-to-government consultation. If such a request is made by a tribe during the process, the FHWA Idaho Division Office should be immediately contacted so they can coordinate the appropriate response to the request. In general, tribes should be included when a project is located on a Reservation, near a Reservation, or within an area of interest to the tribe.

Metropolitan Planning Organizations (MPOs)

MPOs have a specific role in the development of PEL studies: their data are critical to many of the planning

analyses that are the framework for PEL studies. Under federal rules, an MPO is charged with preparing long-range transportation plans within its jurisdiction and implementing the plans through transportation improvement plans (TIPs). An MPO is a federally designated transportation planning body for an urbanized area with a resident population over 50,000. The STIP incorporates the projects selected by the MPO TIPs by reference. The PEL study itself must be in the Unified Planning Work Program (for MPOs) or State Annual Work Program (for the state) when funded with Metropolitan Planning, State Planning and Research (SPR), Surface Transportation Block Grant (STBG), or National Highway System (NHS) funds.

Other Stakeholders

Other stakeholders in the process may include non-governmental organizations, private entities, other planning and development partners with knowledge of plans and policies that affect the study area, elected officials, and residents and businesses within the study area. These stakeholders may have an interest in the study area and can assist with input on the study.

3.4.2 Identify Participation Methods

There are a variety of appropriate public participation techniques for various stages in the PEL process. Outreach techniques should be context-sensitive and tailored to the study area (e.g., provide a translator, if necessary). Stakeholder involvement comes in many forms, as described below:

- Informational outreach techniques (e.g., public and small group meetings, news releases, newsletters, mailers, and websites) are well-suited for use both during the early steps in the PEL process and as a way to keep the public informed throughout the process.
- Data-gathering techniques (e.g., surveys and study phone hotlines) are useful to obtain information from the public or other selected stakeholder groups.
- Participation techniques (e.g., virtual and in-person public meetings, public engagement periods, smaller group meetings, technical committees, visualizations, electronic town halls) are useful for obtaining specific input and feedback about the project area, purpose and need, alternatives, and environmental resources potentially affected.

For information and guidance about public outreach techniques and examples, refer to the ITD Public Involvement Guide.

3.5 Steps for Conducting a PEL Study

The steps for conducting a PEL study depend on the reason for the PEL study, which should be considered and documented in the scope of work.

The PEL Questionnaire provides a list of items to consider when conducting a PEL study and assists with the transition to the NEPA process. However, PEL project teams have the flexibility to conduct a PEL study that responds to all the PEL Questionnaire items or a smaller, more focused PEL study that responds to sections of the PEL Questionnaire. Smaller, more focused PEL studies are generally conducted when there is a particular issue that needs to be studied (such as safety issues or access management in a specific corridor). Whatever the size, the questionnaire needs to be completed and saved in the project file.

This section provides guidance on conducting steps based on the PEL Questionnaire, with the understanding that particular studies may not follow each step and the information needed to complete a step may vary. Determining which portions of the PEL Questionnaire are applicable and the methods by

which the information will be collected and analyzed are important parts of the scoping process and should be completed during the pre-scoping phase.

3.5.1 Define Study Area

The study area should be identified based on a preliminary analysis of the independent utility and logical termini. Determination of the study area is important to identify which resources will be evaluated (or not) as part of the study. The initial study area may be refined as the purpose and need statement is developed and the transportation needs are identified for recommended projects.

3.5.2 Independent Utility/Logical Termini

For project focused PEL studies, the study area for resources reviewed, and any phase of the project identified in an action plan, must have logical termini and independent utility as defined under NEPA. Independent utility and logical termini mean that a project would be functional even in the absence of other projects in the area. According to *The Development of Logical Project Termini (FHWA, 1993)*, logical termini and independent utility can be defined as:

- Rational end points for a transportation improvement.
- Rational geographic extent for a review of the environmental impacts by resource.

ITD follows the general principles identified in FHWA regulation [23 CFR 771.111(f)] for establishing logical termini and independent utility, as described below:

- Connect logical termini and independent utility and be of sufficient length to address environmental matters on a broad scope.
- 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.
- No restriction on consideration of alternatives for other reasonably foreseeable transportation improvements.

During development of an Action Plan (Section 3.7.2) for corridor PEL studies, independent utility and logical termini will need to be identified for each independent project phase to the extent that the phase provides a functional transportation system even in the absence of other project phases.

3.5.3 Planning Context

The planning context based on the Idaho Transportation Investment Program (ITIP) and MPO Transportation Improvement Programs (TIPs) is the foundation for development of a PEL study. Decisions made during planning can be reflected in project specific PEL studies and subsequent NEPA documentation without revisiting those decisions depending on the transportation planning process that was followed and the magnitude and sensitivity of the related issues. It is important to remember that although a PEL study may recommend alternatives for implementation or elimination, the final determination regarding eliminated alternatives and the proposed action is made during the NEPA process.

The project team should begin by reviewing the current ITIP and MPO 20 year Transportation Plan within which the corridor is identified, as well any improvements in the area that are currently programmed. In addition, the project team should review the plans of local agencies within the study area. These plans could include:

- Local Agency Comprehensive Plans

- Local Agency Land Use Plans
- Local Agency Transportation Plans
- ITD and Local Agency Corridor Plans and Previous NEPA Documents
- Local Agency Parks and Recreational Plans
- Local Agency Neighborhood Plans
- Local Transit Agency Plans
- Local Agency Bicycle/Pedestrian Plans
- Access Management Plans
- Access Control Plans
- Local Agency Drainage Plans

The Existing Conditions and Environmental Scan Report should summarize the planning context of the PEL study area.

3.5.4 Determining Operations Methodology

For studies that involve multimodal traffic operations analysis and forecasting for future transportation conditions, an important part of the PEL study initiation is to identify the methods and assumptions with coordination and approval by ITD and FHWA prior to the start of multimodal data collection and analysis.

Determining the methods and assumptions for the assessment of existing and future multimodal operations is a critical piece to inform the purpose and need (Section 3.5.6) and the evaluation of alternatives. Therefore, the approval of the multimodal traffic operations methods and assumptions is a Coordination Point 2 in the PEL study process.

The completed technical memorandum of the operations and forecasting methods and assumptions should be submitted for review and comment to ITD pertinent staff (e.g. Traffic Services) and FHWA study representatives. The memorandum should include:

- Study area and/or network for transportation system operations analysis
- Data collection methods and time periods
- Traffic analysis methods and assumptions
 - Proposed traffic analysis tools
 - Expected analysis time periods (with procedure for determination of time periods from data collection)
- Travel demand forecasting methods and assumptions
 - Forecasting years
 - Forecasting tools and models
- Documentation

The traffic analysis and forecasting methods should follow the methods used when complying with NEPA standards (e.g., forecasts using the approved regional travel demand model, if applicable). The PEL study documentation for the traffic operations analysis and forecasting may consist of a separate traffic analysis

report or a memo to be included as an appendix in the PEL document. Keep in mind, however, that traffic analysis and modeling can add a large cost to a PEL study. The traffic operations analysis for each subsequent project must be updated to the current 20-Year Planning Horizon travel demand model for the relevant MPO or Statewide model during the NEPA process.

3.5.5 Research and Define the Existing and Future Transportation Systems

The transportation system includes the entire transportation network within the project area, including roadway, railroad, transit, bicycle, and pedestrian facilities. Evaluating the existing and future transportation system conditions provides a framework for alternatives development and screening in the PEL study and provides the supporting documentation for the purpose and need, as discussed in Section 3.5.6. The existing transportation system is the transportation network within the project area as it exists today. The future transportation system is the transportation network within the project area as it would be 20 to 25 years in the future if all of the transportation improvements listed in the ITIP or MPO Transportation Plan were implemented, including transit, bicycle, and pedestrian improvements.

Defining the existing and future transportation system helps provide a picture of the transportation system within the project area and determine how the alternatives impact future traffic conditions. This effort, which is often documented in an Existing Conditions and Environmental Scan Report, relies on professional judgment and general knowledge of the project corridor to determine the information sources needed to provide an overview of the existing and future transportation system. The level of detail of the information gathered should correspond with the importance of the specific element to the transportation system. Transportation system elements are described below.

Roadway Network

Information about the roadway network should be collected and discussed by regional planning classification categories (freeway, major regional arterial, principal arterial, and minor arterials). Specific information includes, but not limited to:

- Interstate/Highway through lanes and auxiliary lanes.
- ROW and access.
- Arterial lanes and access.
- Access categories for state highways (if applicable).
- Traffic volumes.
- Major concentrations of travelers.
- Trip data (trip purpose [commuter/non-commuter], local vs. regional, and average distance of trip).
- Adjacent and parallel transportation facilities that have an impact on the project corridor or may be impacted by the project.
- Signalization, access points, interchanges, ramp lengths.

Other roadway network information includes current roadway features, lane configurations, roadway and ROW widths, adjacent landowner characteristics, building setbacks, and locations with existing Access Control Plans.

Traffic Safety and Operations

The collected traffic data for traffic operations should be summarized as coordinated and approved by ITD and concurred by FHWA Idaho Division Office. Outputs from the traffic analysis may include the following:

- Delay
- Demand Volume
- Density
- Flow Rate
- Level of Service (LOS)
- Mode Split
- Number of Stops
- Queue Length
- Demand Volume
- Speed
- Travel Time
- Vehicle Hours of Travel (VHT)
- Vehicle Miles of Travel (VMT)
- Volume to Capacity (v/c) Ratio

Railroads

The study area should be assessed for existing and planned freight and passenger rail facilities, including locations, ROW widths, location and types of crossings, stations, speed of travel, crossing signalization, safety records, schedules, and usage rates.

This assessment helps develop an understanding of the potential constraints and requirements railroad facilities and operations may place on the alternatives analysis and development.

Transit Services

A PEL study should address transit types, including service levels within the study area. Information about transit services should also include routes and frequency. The study area should also be assessed for planned and existing intermodal connection facilities and stations, such as locations and sizes of park-and-ride lots, transit stations, and other facilities that encourage intermodal travel. Information about usage rates and capacity should also be collected.

This assessment helps to identify missing transportation infrastructure, as well as multimodal connections among transit, vehicles, bicycle, and pedestrian facilities that could or should be addressed as part of the alternatives analysis and development.

Bicycle and Pedestrian Facilities

The study area should be assessed for existing and planned bicycle and pedestrian facilities. Information about bicycle and pedestrian facilities should include locations and widths of routes, sidewalks, paths, trails, crosswalks, and lanes within the study area and connections to other transportation facilities.

Americans with Disabilities Act (ADA) accessibility should also be considered.

This assessment helps to identify missing bicycle, pedestrian, and ADA-accessible infrastructure, as well as multimodal connections among transit, vehicle, bicycle, and pedestrian facilities that could be addressed as part of the alternatives analysis and development.

Utilities

Existing and proposed utilities should be assessed through a review of utility company maps and field review. Utilities include and are not limited to a private or publicly owned line, facility, or system for producing, transmitting, or distributing communications, cable television, power, electricity, light, heat, gas oil, crude products, water, steam, waste, stormwater not connected with highway drainage, or any other similar type of commodity that directly or indirectly serves the public (23 CFR Part 645.105 (m) Utility Relocations, Adjustments, and Reimbursement Definitions).

This assessment helps to identify utilities that may require coordination with utility owners and/or relocation during future project development.

Early coordination with utility owners assists with identifying potential conflicts with existing and future utility owners. Information about existing and future utilities is also useful for the development of alternatives in relation to existing utilities and costing of potential utility relocations.

Other Projects in the Study Area

A PEL study should identify and consider other transportation or large development projects (ongoing and future) in or within the vicinity of the study area. Identification of such projects facilitates early coordination with other nearby projects, helping to achieve consistency and support of these other projects.

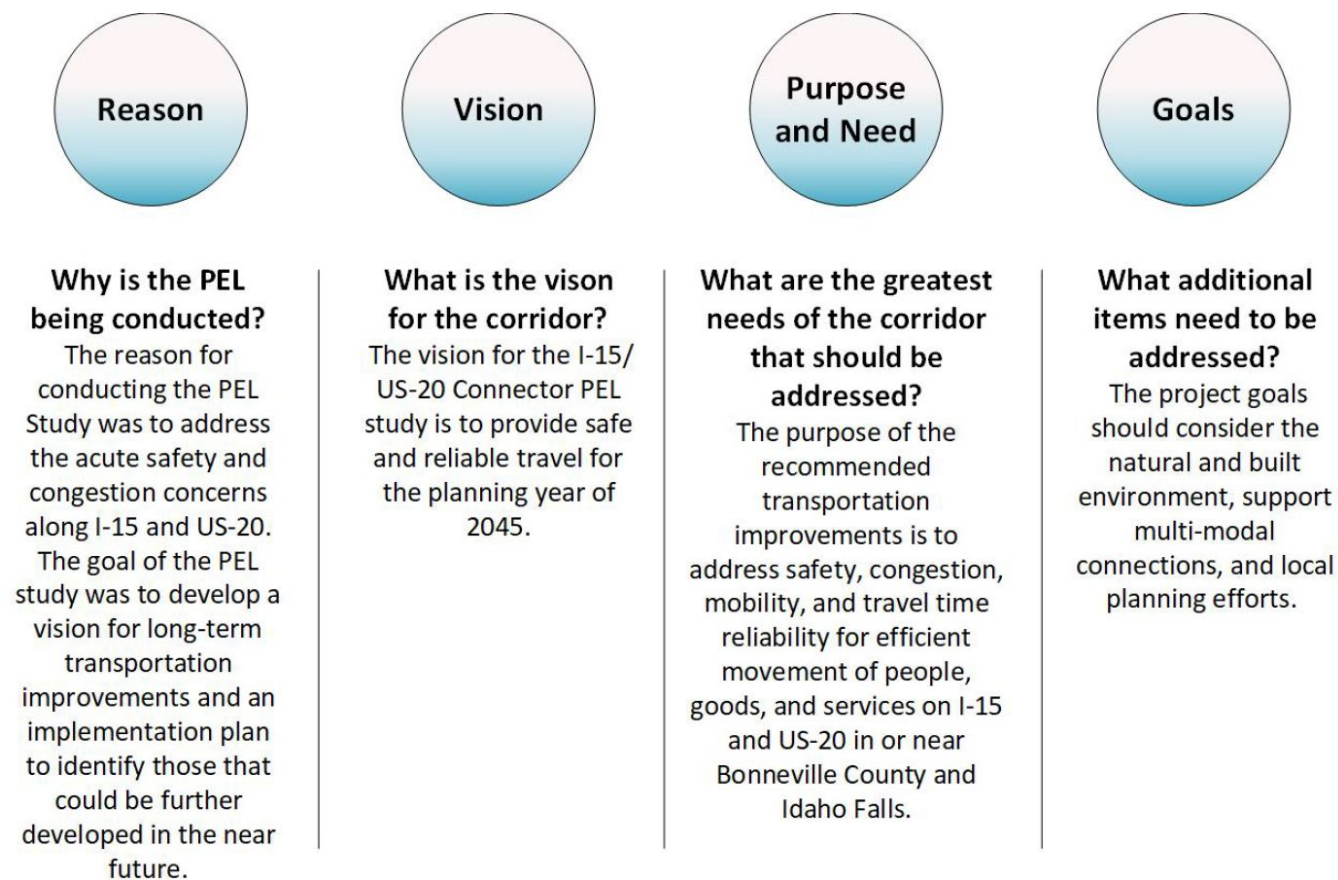
3.5.6 Identify Purpose and Need

The project purpose and need statement should be developed in coordination with agency stakeholders with review and feedback by the public. The goal in drafting the purpose statement is to define as specifically as possible the fundamental reasons why the project is being proposed, expressed as a desired transportation outcome. The development of the purpose and need is part of Coordination Point 2 of a PEL study.

The purpose and need should focus on transportation-related needs, emphasizing the needs related to the transportation system and/or infrastructure. For example, many transportation projects are proposed, at least in part, because it is believed they will help promote economic growth, but the potential for economic development benefit should not be defined as a project purpose. Instead, the purpose could be defined as providing the transportation infrastructure needed to support an economic development plan and therefore growth. Figure 5 summarizes the differences between:

- Why is a PEL study being conducted?
- What is the vision for the study area?
- What are the transportation needs for the study area?
- What additional goals should be addressed?

Figure 5: Example PEL Study Reason, Vision, Purpose & Need, and Goals



Detail provided during planning reduces the amount of time spent on purpose and need development during the NEPA process. For some studies, the purpose and need statement may be a general vision and articulation of broad needs or specific to a localized transportation problem.

Developing a purpose and need statement is essentially the foundation of NEPA and the decision-making process. According to Council on Environmental Quality (CEQ) Regulation 1502.13 “purpose and need,” the statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives, including the Preferred Alternative. A thoughtful purpose and need developed during a PEL study will increase the relevance of the PEL study information in NEPA and help focus the PEL study in the same way that the purpose and need is foundational for the NEPA process.

Identify Goals

During the development of a PEL purpose and need, there will often be items that are desired by local agencies, stakeholders, or the public that may not meet the FHWA requirements to be included as part of the purpose and need. However, these items are still important to consider during the development and screening of alternatives. Project goals can also be used as screening criteria in Level 2 and beyond, as discussed in Section 3.5.7.

3.5.7 Alternatives Screening Process

PEL Alternatives Development and Screening Process

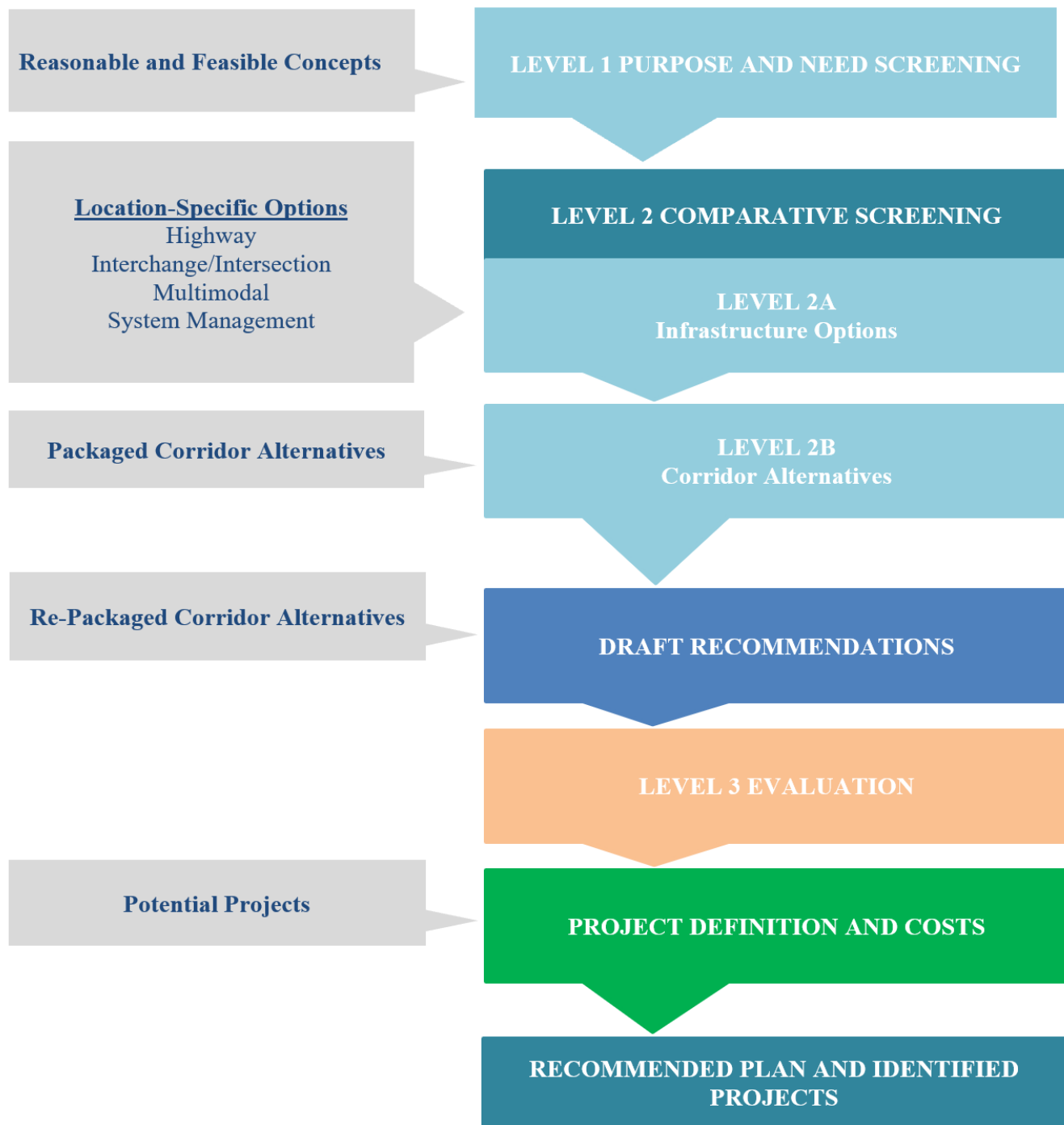
The intent of the alternatives development and screening process is to identify and screen a broad range

of reasonable improvement alternatives for the area/corridor being studied. The application of the screening process is flexible, and the process used should recognize the diverse elements of the specific study's transportation system and surrounding environment. This section and section 3.5.7 provide guidance on alternatives development and screening, part of Coordination Point 3 for ITD PEL studies.

The alternatives development and screening process (Figure 6) includes developing evaluation criteria based on the project purpose and need and goals, developing a range of reasonable alternatives, and narrowing options and alternatives through a multi-tiered screening process. A PEL study is not required to screen alternatives down to a single Recommended Alternative. **Most PEL studies conclude with several Recommended Alternatives.**

The screening process will document the elimination of alternatives to limit the need for consideration during future NEPA process(es) and identify transportation projects that will be more fully evaluated during future project development and NEPA documentation. The PEL alternatives screening process is flexible. All levels of screening do not need to be completed for the study to be valuable at informing NEPA.

Figure 6: Example of Alternatives Screening Process



Identify Screening Criteria

Alternatives may be screened with respect to the transportation benefits provided, public input, and potential environmental impacts. The complexity of the screening process depends on the complexity of the study. Alternatives screening may involve several levels of analysis before the list of alternatives can be narrowed to a reasonable set for final evaluation.

Level 1: Purpose and Need Screening Criteria

The Level 1 screening will consist of determining those alternatives that meet purpose and need. Level 1 screening criteria should be developed to evaluate concepts using the primary elements of the project purpose and need, using Yes-or-No questions to determine if an alternative meets the purpose and need. A proposed alternative that has a “No” answer to any of the questions is considered to not fully meet the project purpose and need.

Level 2: Comparative Screening Criteria

The purpose of the Level 2 screening is to establish a means for comparing how well alternatives perform in meeting the project purpose and need in a cost-effective and least harmful manner to the human and natural environment.

Alternatives carried forward from the Level 1 screening may be combined and/or refined to provide more information for further assessment in the Level 2 screening. More information can be added, as appropriate, to understand the projected study area traffic flows and potential safety components and community and environmental benefits and impacts, but the level of design should remain at a conceptual level. To compare the impacts of alternatives, cross-sections and/or conceptual alignments may be developed with ROW width assumptions for each alternative based on appropriate standards for the roadway classification and multimodal elements.

Screening Criteria are generally categorized by a category such as “safety,” “congestion,” or “environmental”. The performance measures can be quantitative or qualitative in nature. While most PEL studies do not include alternatives screening past the Level 2 screening, more detailed comparative criteria can be developed should additional screening levels be required. Project cost should be considered as an evaluation criterion only with a high-level assessment of general magnitude of cost (i.e., low, moderate, high, very high). Magnitude of costs is for information only and alternatives should not be screened out based solely on project costs.

3.5.8 Alternatives Development

Initial alternatives for improvements should be developed from reasonable options focused on addressing the project purpose and need and issues identified in the evaluation of existing and future conditions. These initial alternatives should be coordinated with agency stakeholder input, public input, and technical input of the project team. The No-Action Alternative must be carried forward through the entire screening analysis as a baseline for comparison, even if it does not address the project purpose and need.

For long corridors with varying issues and surrounding environments, initial alternatives may be categorized for the first levels of screening before compiling corridor-wide recommendations. Example categories include:

- Highway
- Intersections/interchanges

- Multimodal elements
- Corridor management

The initial alternatives developed for the PEL study are expected to be high-level concepts without design details. Corridor management alternatives may consist of simple alignments with a general cross-section. Intersection/interchanges may be general alternatives (e.g., diamond interchange, roundabout, continuous flow intersection) using simple illustrations or examples from other locations.

Define No-Action Alternative

Similar to the NEPA process, a PEL study should evaluate a No-Action Alternative. The No-Action Alternative typically does not meet purpose and need but is used as a baseline against which to compare alternatives. The No-Action Alternative does not provide any improvements beyond the existing transportation system; however, the No-Action Alternative includes safety and maintenance activities required to sustain an operational transportation system.

Alternatives Screening

A PEL study often develops, refines, and screens alternatives several times. The goal of the screening process is to identify and refine the transportation improvements that best meet the purpose and need of the project, while minimizing impacts to the human and natural environment. As such, documentation of the alternatives analysis and screening is critical if such recommendations are used during future NEPA processes. Documentation should include criteria (e.g., technical, environmental, economic) used to screen alternatives, a list of the parties involved in establishing alternatives evaluation criteria, and the reasons alternatives were eliminated. FHWA code (23 CFR Part 450) provides agency flexibility in identifying terminology for use in the alternatives screening process.

Level 1 Purpose and Need Screening

During the Level 1 Screening, alternatives are usually evaluated qualitatively, primarily using available data and the professional judgment of the project engineering and planning staff. Any alternative that has a “No” answer to any of the Level 1 screening questions is considered to not fully meet the project purpose and need. If an alternative should be evaluated quantitatively and with more criteria to make an informed decision for recommendation, it can be carried forward to Level 2 screening for further evaluation. To identify the best solution possible, alternatives can also be retained as elements to consider with alternatives that are carried forward to Level 2 screening. For example, a pedestrian/bicyclist grade separation may not fully meet the purpose and need as an independent alternative for a highway corridor, but it could be retained as an element to include in Level 2 alternatives to enhance multimodal safety and operational improvements along the corridor.

The following terminology and the respective definitions are recommended when conducting screening Level 1 analysis:

- **Eliminated** = Does not meet purpose and need, has a fatal flaw⁵, and/or is considered unreasonable (with notes provided on reasons why the alternative is considered unreasonable).
- **Retained or Carried Forward** = Carried forward for further evaluation in Level 2 screening.

⁵ A fatal NEPA flaw is one that is serious enough and obvious enough that a judge (or an agency legal counsel) would deem an environmental document unacceptable as written.

- **Retained as an Element or Eliminated as a Stand-Alone** = Does not fully meet purpose and need, but will be evaluated as a packaged element of larger-scale alternative.

Level 2 Comparative Screening

The purpose of the Level 2 screening is to establish a means for comparing how well alternatives perform in meeting the project purpose and need in a cost-effective and least environmentally harmful manner. Alternatives carried forward from the Level 1 screening may be combined and/or refined to provide more information for further assessment in the Level 2 screening. More information can be added, as appropriate, to understand the projected study area traffic flows and potential safety components and community and environmental benefits and impacts, but the level of design should remain at a conceptual level. To compare the impacts of alternatives, cross-sections and/or conceptual alignments may be developed with ROW width assumptions for each alternative based on appropriate standards for the roadway classification and multimodal elements.

The Level 2 screening expands measures for each screening criterion from Level 1 screening and provides additional screening criteria based on project goals. In Level 2 screening, the alternatives are evaluated to identify fatal flaws related to infeasibility or unacceptable community or environmental impacts and to compare how well each concept meets the project purpose and need and goals. The results of the Level 2 screening identify the alternatives that are most practical or feasible to carry forward as study recommendations.

Level 2 Screening terminology includes:

- **Eliminated** = Does not meet purpose and need, has a fatal flaw, and/or is considered unreasonable (with notes provided on reasons).
- **Carried Forward** = Considered reasonable and feasible and may be considered for further evaluation in this study or subsequent NEPA and project development.
- **Recommended** = Considered reasonable and feasible and recommended for consideration as the Preferred Alternative⁶ during subsequent NEPA and project development.
- **Not Recommended** = While alternative meets purpose and need, it will not be evaluated further in this study due to comparatively negligible benefits and higher impacts than other alternatives, but may be studied further with subsequent NEPA and project development.

Level 3 (Detailed) Screening and Beyond

Some PEL studies may not include alternatives screening past the Level 2 screening. However, the alternatives (typically two alternatives and the no build) carried forward from Level 2 screening may be further evaluated to provide more information on the benefits and impacts of the potential study recommendations, including more information from conceptual cost estimates and potential right-of-way impacts. If needed, the Level 3 and further screenings would expand measures for differentiating screening criteria from Level 2 screening and would provide additional detailed information to facilitate future project development.

Differentiating screening criteria are criteria that shows a difference between alternatives/options. By the

⁶ The “Preferred Alternative” is a term specifically used in the NEPA process.

end of Level 2 screening, the alternatives carried forward will have similar results from many evaluation criteria. There may not be a need to continue to screen the alternatives against those non-differentiating criteria, unless the information provided would be helpful with future project development, such as right-of-way needs for cost estimates and potential environmental impacts for future environmental documentation scoping.

Level 3 and beyond screening may be completed for long and/or complicated corridors with an alternatives screening that separated modes or other elements. The further screening would consider the compilation of the elements into compiled corridor alternatives.

Level 3 Screening (or beyond) terminology are the same as Level 2.

Recommend Alternative(s) for Future NEPA Studies

A PEL study is not required to screen alternatives down to a single Recommended Alternative. **Most PEL studies conclude with several Recommended Alternatives.** However, all the Recommended Alternatives from a PEL study are not required to be evaluated in NEPA. Results of the alternatives screening should be clear on the study recommendations that may move forward into future study. Next steps should be outlined for potential implementation of the Recommended Alternatives and/or separate project phases, including anticipated process requirements and conceptual costs. Section 3.7.2 describes how to document the next steps as part of an action plan.

Chapter 5.0 provides more detail on taking the PEL study recommended alternative(s) into NEPA.

3.5.9 Conduct the Existing Conditions and Environmental Scan Report

The scope of the environmental overview for a PEL study will vary depending on the type of and reason for the PEL, which will be outlined in the scope of work. An environmental scan is not an exhaustive list of environmental resources but should focus on those resources that may affect the alternative development and screening process or may affect future NEPA projects in terms of budget and schedule.

The goal of the scan should be to identify resources that may affect future NEPA actions, project schedules, or project costs; understand potential impacts on these resources; and identify potential avoidance, minimization, and mitigation measures. Resources that may affect future project development include those that may require avoidance or minimization of impacts during alternatives development, have lengthy environmental clearance processes, or are likely to be controversial or complicated.

Scoping and Identifying Important Resources

At the start of the project, the project team must identify key environmental resources in the study area that could require avoidance or minimization of impacts during alternatives development, such as wetlands, hazardous materials sites, historical or cultural artifacts, endangered species, or floodplains. The project team should also identify potentially affected resources that have lengthy environmental clearance processes, such as historic resources, recreational resources, biological resources, wetlands and other waters of the U.S., and protected species.

Development of an “Existing Conditions and Environmental Scan Report” section for a PEL study is similar to the development of the Affected Environment section of an EA or EIS; however, the scan will be at a higher level, focusing on identifying key issues and resources to be considered in future NEPA and design activities, rather than conducting lengthy field reviews and impact analyses on an exhaustive list of resources.

The level of detail included in the “Existing Conditions and Environmental Scan Report” section is project-specific and will vary based on factors, such as the type and location of the project. For instance, a project requiring design-level detail would require more detail concerning the environmental resources within the study area than a planning-level project that may identify trends or big picture constraints. Assessing resource impacts in the study area may or may not be desired, depending on the scope and objectives of the particular PEL study. The resource information should also consider, build upon, and be consistent with other environmental studies that have been completed or are nearing completion in the study area.

The PEL may consider cumulative impacts analysis by identifying the geographic context for analysis, projects that may contribute to cumulative effects, resources sensitive to cumulative impacts, or other factors. The goal of considering cumulative impacts in a PEL study is to “look broadly at future land use, development, population increases, and other growth factors”. ITD could conduct a PEL study solely for the purpose of creating a baseline that future projects could use for cumulative impacts analysis.

After identifying key environmental resources, the project team must identify specific study areas for each resource. Resource-specific study areas will vary and may be the same as the project footprint or larger than the project footprint. Preliminary environmental data collection and analysis varies with the resource, potential impacts, and complexity of the project. The baseline information should rely heavily on information already available from agencies responsible for environmental resources (e.g., USFWS). Baseline information is typically collected using geographic information systems (GIS) data, combined with a site visit of the study area.

Other data sources might include relevant environmental or transportation reports pertinent to the study area, previous surveys within the study area, HQ subject matter experts, and consultation with resource experts, including external agency personnel.

Identifying Impacts

The analysis of potential impacts forms the basis for comparing the PEL study alternatives. NEPA uses the term “impact,” “effect,” and “consequences” synonymously. Impacts may be environmental (e.g., ecological, historical) or social (air quality, community impacts, noise) and may be either beneficial or adverse. Beneficial impacts may occur when an alternative improves a situation.

Early in the planning stages, the project team should be able to identify potential environmental impacts and key environmental resources in the study area. The level of analysis will vary based on project-specific factors; however, the analysis will not be as robust as that conducted during the NEPA process but should be of sufficient detail to screen out “fatal flaws” associated with design alternatives. The description and analysis of impacts must be supported by the information and data presented in each of the specific resource sections.

As previously discussed, data and analyses should be commensurate with the importance of the potential impact, as identified during the scoping process, with less important material summarized, consolidated, or simply referenced. It is easy to do a detailed impacts analysis during a PEL study because that is what most practitioners are used to doing during the NEPA process. However, environmental conditions and engineering design will likely change by the time the project is funded and the NEPA process begins. Therefore, it is better to do the detailed impacts analysis during the NEPA process.

Recommending Mitigation Strategies

A PEL study could identify potential mitigation strategies for impacts identified with the alternatives. Mitigation strategies include measures that:

- Rectify the impact by repairing, rehabilitating, or restoring the affected environment.
- Reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action.
- Compensate for the impact by replacing or providing substitute resources or environments (CEQ, 40 CFR 1508.20).

The mitigation section of the PEL document should include:

- Avoidance and minimization strategies
- Mitigation strategies
- Basis for the mitigation strategies
- Appropriateness, reasonableness, and timing of the mitigation strategies relative to project planning and implementation
- Coordination required to obtain agreement on mitigation strategies
- Implementation and monitoring of mandated mitigation strategies
- Reasonableness and reliability of the mitigation strategies

3.6 Identify Next Steps for Project Implementation

The next steps, like all steps in the PEL process, depend on the type, timing, and recommendations of a PEL study. A PEL study is intended to provide the framework for implementing transportation improvements, considering needs, funding, and requirements for future NEPA documentation. In addition, a PEL study provides information to support the NEPA process, including identifying issues that require additional evaluation and recommending methods to address those issues in any future NEPA documentation.

3.6.1 Amendments to Local Agency, Regional, and Statewide Transportation Plans

As discussed in Section 3.5.3, the planning context of a PEL study area should be understood as part of the existing conditions. A PEL study should be consistent with and honor previous efforts in local agency plans; however, there may be cases where changed conditions or results of a PEL study should be reflected through amending an existing local agency plan, such as a local agency comprehensive or transportation plan. Further discussed in Section 3.7.2, the Action Plan should identify the project sponsor, whether a local agency or ITD, and identify the process for adoption of the project into the local agency plan, as well as the TIP or ITIP as funding is identified.

A PEL study should identify any actions that need to happen before a future NEPA process can occur. These things could include but are not limited to resources that need additional research and what funding sources are reasonably available.

3.6.2 Action Plan

In cases where a project is anticipated to be implemented in more than one phase, care must be taken to ensure that the transportation system operates acceptably at the conclusion of each phase. Additionally,

the action plan must demonstrate compliance with other statutory requirements.

Mitigation strategies and next steps needed in response to project impacts are typically implemented with the phase in which the impacts occur, rather than deferred to a later phase.

Independent phases for the project should meet the following criteria:

- Independent Utility/Logical Termini — Each phase should have independent utility and logical termini to the extent that the phase provides a functional transportation system even in the absence of other phases.
- Elements of Purpose and Need — Each phase should contribute to meeting the purpose and need for the overall project.
- Environmental Impacts — Individual phases should not introduce substantial additional environmental impacts that cannot be avoided or mitigated.
- Mitigation Strategies and Next Steps — Each phase should include appropriate strategies to mitigate the environmental impacts of that phase.

Establishing meaningful project phases and connecting them with potential funding packages helps to further the projects identified in a PEL study. In addition to these criteria, project phases should be sequenced and prioritized logically in terms of constructability and operations.

Given the variability in the amount and timing of funding, the project team can work with project stakeholders to identify and prioritize projects for a range of funding scenarios to maximize benefits within available funding. As part of a PEL study, the project team may develop an action plan that provides the following information:

- Prioritize transportation needs.
- Identify funding that can be reasonably expected to be available for major transportation projects within the current planning horizon, as identified in the MPO Transportation Plan and ITIP.
- Define logical project phases that can be implemented as individual projects based on funding availability, as well as groups of project phases that can be packaged as a larger project if funding becomes available, considering the projected funding sources with the transportation needs.
- Identify interim projects that can be implemented with limited funding.
- Identify project sponsors (a local agency or ITD) for each individual project and interim projects.



CHAPTER HIGHLIGHTS

- *Thorough documentation of the PEL study analysis and decisions are crucial to the transition into the NEPA process*
- *Project team must review and complete the necessary sections of the PEL Questionnaire early in the project and continuously throughout the PEL process*

4

DOCUMENTATION REQUIREMENTS FOR A PEL STUDY

The PEL study process and results must be recorded in a PEL document at the end of the study. This chapter provides information on the documentation requirements for a PEL study, including the study analysis and decisions [fulfilling conditions set forth in 23 USC 168(d)], the PEL Questionnaire, and technical reports.

Appendix E contains an example PEL document table of contents for a comprehensive PEL study. Many PEL studies may focus on a smaller number of steps, depending on the study objectives, and the resulting PEL document would include less information than shown in the example table of contents.

4.1 Documentation of Study Analysis and Decisions

Thorough documentation of the PEL study analysis and decisions made are crucial to the transition into the NEPA process. The body of the PEL document should provide detailed information from the PEL study analysis and decisions, in a format that can be included in the NEPA document as an appendix or by reference. If any information is incorporated by reference, it must be readily available for agency or public review. Completed PEL documents can be found on ITD's Project website (<https://itdprojects.idaho.gov/>).

Typically, the information from the PEL study does not contain the information or analysis required for a NEPA level of study and would be supplemented during the actual NEPA process; however, the actual level of detail for a PEL study should be clarified during development of the project scope of work (Section 3.2). Analysis and documentation requirements should be agreed upon at the beginning of the study and incorporated into the scope of work.

The PEL document should include enough information to show that the PEL study fulfills the requirements set forth in 23 U.S.C. 168 for the adoption of planning products for future use in NEPA processes.

The PEL should include documentation of the public involvement process so that the documentation can be carried forward into any future NEPA process. Basic documentation that should be collected for all public involvement activities includes information, such as the following:

- Advertisements used for activity/event
- Copies of handouts
- Documentation of displays or exhibits used
- Purpose for event/activity
- Number of public meetings and contact lists
- Locations, times, and dates of public meetings
- Meeting attendance (i.e., sign-in sheets)
- Meeting summaries (i.e., transcripts and meeting notes)

For additional information and guidance about public involvement documentation, refer to the ITD Public Involvement Guide.

4.2 FHWA PEL Questionnaire

The PEL Questionnaire is intended to provide documentation of the PEL study and should be included with the submittal of the PEL document (e.g., as part of executive summary, chapter, or appendix). PEL studies are not required to address all the topics in the PEL Questionnaire, and only the relevant topics should be addressed and completed. The PEL Questionnaire should be considered a tool for organizing and following the PEL process, and project teams should use it as a guidance document, prior to and as the PEL study progresses rather than using it solely as an “after- the-fact” checklist. ITD **requires** project teams to review and complete the necessary sections of the PEL Questionnaire early in the project and continuously throughout the PEL process. The FHWA PEL Questionnaire can also be useful for organizing and identifying documentation as a project transitions from planning to NEPA analysis.

4.3 Technical Reports

Technical reports prepared for a PEL study supplement the PEL document, are project-specific, and are identified based on the characteristics of the study area and input from stakeholders. Technical reports may include documents such as an Existing Conditions and Environmental Scan Report, Roadway Existing Conditions Report, or Alternatives Report.

When identifying technical reports needed for a PEL study, the project team evaluates which reports are necessary for PEL process decision documentation and those that will be necessary for future NEPA documentation.



CHAPTER HIGHLIGHTS

- *Completing a PEL study does not reduce the level of documentation required by NEPA*
- *A PEL study may recommend alternatives, however the final determination on preferred alternatives is made during NEPA*
- *The PEL study documentation will provide specific information about when and how public input was obtained, how it helped shape the recommended alternative(s) and analysis, and how it should be used during the NEPA process*

5

TRANSITIONING FROM A PEL STUDY TO THE NEPA PROCESS FOR FEDERALLY FUNDED PROJECTS

PEL studies are conducted to link transportation planning and the environmental process. For federally funded projects, a PEL study provides a foundation for NEPA scoping, informing the project purpose and need, defining the important issues to be addressed in the NEPA process, providing alternative recommendations, and providing context for how the project could be advanced. Although NEPA studies are often conducted without a previous PEL study, starting the NEPA process with information developed in a PEL study provides many benefits, including:

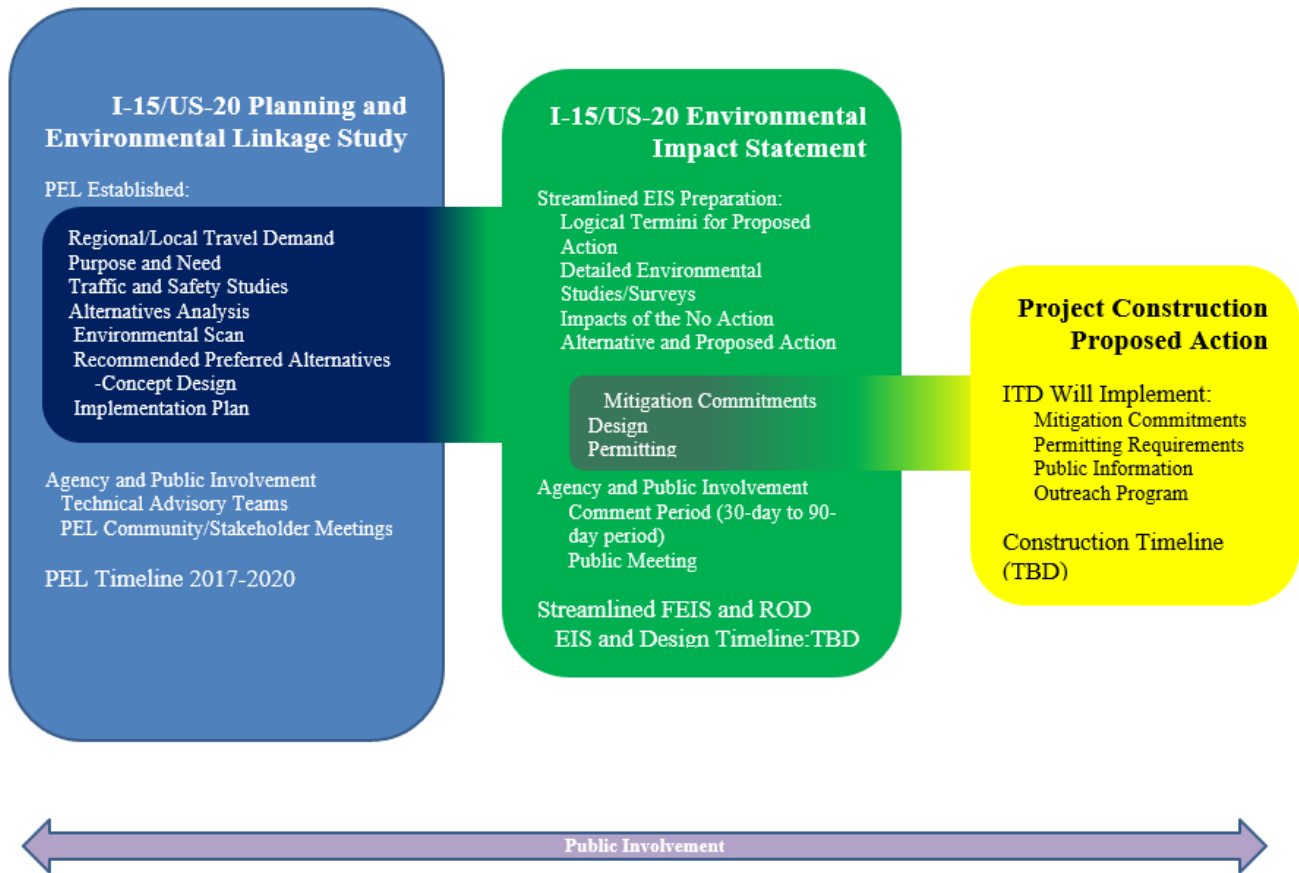
- Defined project purpose and need
- Reduced work effort
- Improved communication with stakeholders
- Earlier recognition of potential environmental issues
- Streamlined project delivery process

Completing a PEL study does not reduce the level of documentation required by NEPA. However, having a completed PEL study may clarify the project and provide information to more efficiently complete the NEPA process. Figure 7 depicts the transition from the PEL process to the NEPA process and construction for I-15/US-20.

For studies expected to move into the NEPA process in the future, the PEL Questionnaire provides a list of items to consider assisting with the transition to the NEPA process. Some PEL studies may respond to

all the PEL Questionnaire items, while others may respond to pieces of the PEL Questionnaire. The scope of work is developed based on the reasons for and the expected outcomes of the PEL study. Regardless of a PEL study’s scope, the results of the study can provide useful information for use in the NEPA process.

Figure 7: Example of the Transition from a PEL Process to the NEPA Process through Design and Construction



A PEL study can inform all steps in the NEPA process, and PEL documentation can and should be referenced and formally incorporated into and/or appended to the NEPA documentation. The completion of a PEL study should reduce the time required during NEPA, particularly CEs and EAs. A PEL study also provides information needed to inform the class of NEPA action by determining the possibility that the action is likely to have significant impacts.

The adoption and use of a PEL study in the NEPA process is subject to a determination by FHWA, with the concurrence of other stakeholder agencies, that the ten conditions listed in Section 2.1 have been met. Specifically, the PEL study was approved less than 5 years prior to the date in which information is adopted in NEPA.

5.1 Scoping for NEPA Using PEL Study Information

Projects requiring NEPA should be scoped with an understanding of what PEL study information is available and how it should be incorporated into NEPA. NEPA scoping is defined as an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related

to a proposed action. The PEL study likely accomplished and documented these issues, as well as issues requiring additional detailed review in the NEPA process.

The PEL Questionnaire documents how PEL study information should be used during the NEPA process and should be reviewed by the NEPA project team before scoping for NEPA. The PEL Questionnaire addresses the following items related to the typical steps in the NEPA process:

- Scoping
 - How the PEL methodology should be presented in NEPA
 - What steps should be taken with each agency during NEPA scoping
 - Whether any unresolved issues exist with the public, stakeholders, or agencies
 - How to use PEL study information when coordinating with agencies and the public during the NEPA process
 - Critical issues identified in the PEL study that need consideration in the NEPA process
- Purpose and Need
 - What steps will need to be taken during the NEPA process to convert the PEL study vision/purpose and need into a project-level purpose and need statement
- Alternatives
 - Which project alternatives should be brought forward into the NEPA process and why
- Environmental Analysis and Mitigation
 - Which resource issues need to be considered during the NEPA process
 - Which environmental resources were evaluated in the PEL study and why, and how environmental resource data will be supplemented during the NEPA process
 - Which environmental resources were not evaluated in the PEL study and why, and whether they should be reviewed during the NEPA process
 - Mitigation strategies that should be analyzed during the NEPA process

Once the project team has reviewed the PEL Questionnaire to determine what information is available to bring into the NEPA and how, the project can be appropriately scoped for NEPA to include any follow-on steps identified in the questionnaire. Additionally, a PEL study may document certain conditions or follow-on steps that will affect the NEPA schedule or budget. For example, if a PEL study identified the presence of resources with lengthy environmental clearance processes, these should be factored into the project schedule and budget. If a PEL study identified resources that need avoidance or minimization in the project design, this should be factored into the preliminary design scope. If a PEL study identified resources not present or of no concern for the project, the NEPA scoping process should confirm these conclusions and, if appropriate, eliminate or minimize the consideration of these resources in the NEPA process.

The remaining sections in this chapter discuss the specifics of how the NEPA process can incorporate each of the PEL study steps discussed in Section 3.5.

5.2 Incorporating Purpose and Need

The purpose and need statement is a critical component of the NEPA process. It helps articulate transportation needs that should be addressed and provides the basis to evaluate how well alternatives meet the purpose and need, in context of their environmental impacts and other costs and benefits. NEPA documentation typically includes several components for the purpose and need: the purpose for the project; the needs the project aims to address; identification of transportation system deficiencies; and the extent or logical termini of the project.

The NEPA process may incorporate purpose and need information exactly as it was developed in the PEL study if the PEL study was adopted within 5 years of the initiation of NEPA, or it may modify the purpose and need to capture localized issues that are inherent to the individual project undergoing NEPA review. For example, the purpose and need for a corridor PEL study is likely to be broader than that for an individual project within the corridor. In such a case, the NEPA analysis should consider a project-specific purpose and need that relates to the broader corridor purpose and need and should explain the relationship between the two. The CEQ guidance on the use of programmatic NEPA reviews (CEQ, 2014) contains a relevant brief discussion on the relationship between a programmatic purpose and need, and a subsequent project-specific purpose and need. The CEQ guidance notes that project-specific purpose and need statements focus primarily on the issues relevant to the specific proposal without needing to duplicate the material prepared at the programmatic level.

In identifying a project's purpose, needs, and objectives, a PEL study usually identifies problems that need to be resolved, such as safety concerns, traffic congestion, or infrastructure deficiencies. This information can be used in the NEPA process as supporting information if the PEL study was adopted within 5 years of the NEPA document.

If the NEPA document focuses on a specific project identified in a PEL action plan, the PEL study likely identified the project's logical termini and explained its independent utility. Logical termini and independent utility must be identified and justified in NEPA under FHWA regulations. PEL studies often provide information to support the identification of logical termini and independent utility that can be validated and incorporated into NEPA directly.

If the PEL study occurred more than 5 years before the NEPA analysis, the data used in the PEL study may no longer be a good representation of conditions in the study area. The information used to develop the purpose and need, and logical termini must be reviewed to see if conditions or the planning context have changed. If conditions have not changed, the NEPA document may use the information from the PEL study and explain why that information is still useful to the decision-making process. FHWA should be consulted on this decision.

5.3 Incorporating Transportation System, Safety, and Operations Data

A PEL study describes the existing and future transportation system within the study area to 1) support the purpose and need and 2) provide a framework for alternatives development. The NEPA analysis must evaluate the transportation system to determine the alternatives' ability to address the project's purpose and need—which is tied heavily to transportation problems—and to define the impacts of the project on the transportation system.

When NEPA follows a PEL, it can incorporate the PEL study transportation system and operations data

if the PEL study is less than 5 years old and if the 20-Year planning horizon for the relevant MPO or Statewide travel demand model has not changed. Information about traffic volumes, travel patterns, or crash data, for example, may be important in understanding the operation of the existing and future transportation system. The traffic operations analysis for each project must be updated to the current 20-Year planning horizon travel demand model. If such data are less than 5 years old, no major changes have occurred since the data were gathered, and the current 20-Year planning horizon is still relevant, the NEPA document can use these data directly in support of the project's purpose and need or alternatives and impact analyses. For example, a NEPA document for a project addressing congestion at an intersection could rely on LOS, turning movement, and queue length information from a recent PEL study to support the project purpose and need. Similarly, travel demand modeling outputs that show how a particular alternative would operate in the design year may be used during the NEPA analysis as part of the transportation impacts analysis, if the PEL study is less than 5 years old and the current 20-Year planning horizon has not changed. The Idaho Crash Data Dashboard provides 5 years of crash history and may need to be updated with the most current set of data at the discretion of FHWA and the ITD Traffic Engineer.

If a preceding PEL study is more than 5 years old by the time the NEPA document is initiated, the information must be reviewed during the NEPA process to determine whether the PEL study results are still usable or new data need to be gathered, including updated travel demand modeling.

5.4 Incorporating Alternatives Analysis

Frequently, the goal of a PEL study alternatives analysis is to identify and refine the transportation improvements that could meet the project purpose and need or the vision for the study area. PEL studies may develop and refine alternatives, recommending one or more alternatives, besides the No-Action alternative, to be carried forward in the NEPA analysis, as well as eliminating alternatives that should not be considered further because they do not meet the purpose and need or are otherwise infeasible.

Different classes of NEPA actions require different levels of alternatives development and analysis:

- CEs do not explicitly require an alternatives analysis, although any environmental impact avoidance and minimization alternatives must be discussed.
- EAs require consideration and analysis of an Action Alternative and No-Action Alternative only, and do not require an agency to analyze all reasonable alternatives. If other alternatives were considered, the EA must document why they were dismissed. EAs must also discuss any environmental impact avoidance and minimization alternatives.
- EISs must evaluate in detail a reasonable range of alternatives and the No-Action Alternative. An EIS must document why alternatives were dismissed from further consideration and discuss any environmental impact avoidance and minimization alternatives.

The alternatives identified in the PEL study often provide the framework for NEPA alternatives analysis and recommendations. The decision of which PEL study alternatives to advance into NEPA depends on the timing and class of NEPA documentation and the project context:

- If the NEPA process is a CE or EA and occurs within 5 years of the PEL study adoption, the NEPA project team can choose to proceed with only one of the recommended alternatives from the PEL study, even if additional alternatives were recommended. The NEPA document should provide background on the alternatives development and screening conducted during the PEL study to substantiate the reason for proceeding with only one action alternative (and the No-

Action Alternative if it is an EA) in the NEPA process.

- If the subsequent NEPA document is a CE or EA and occurs within 5 years of the PEL study adoption, the NEPA project team may choose to analyze more than one action alternative. The project team may choose to advance more than one of the PEL study alternatives into the NEPA process for a variety of reasons. Sometimes no clear “preferred alternative” emerges from the PEL study, and further analysis in the NEPA process is warranted. Sometimes the NEPA scoping process identifies a new alternative not considered in the PEL process or demonstrates a lack of consensus around a single action alternative. Other times, considering more than one alternative would be prudent if any conditions have changed—such as implementation of nearby projects or changed environmental conditions—or if the project is controversial.
- If the subsequent NEPA document is a CE or an EA, and the PEL study will be more than 5 years old when the NEPA analysis occurs, the PEL study alternatives analysis must be reviewed to determine whether the analysis and results are still usable or whether conditions have changed, before proceeding with a recommended alternative. If conditions have changed, additional alternatives may need to be considered. FHWA should be consulted regarding these decisions.
- If the subsequent NEPA document is an EIS, all reasonable alternatives that meet the purpose and need, including all the PEL alternatives, must be fully considered in the EIS regardless of how recently the PEL study was adopted.
- In cases where the PEL study already developed alternatives, set evaluation criteria, followed a NEPA-like alternatives evaluation and screening process, documented the results and recommendations, and coordinated with FHWA, all of these inputs can be used in the NEPA analysis. The results and recommendations from the PEL study can directly inform and substantially narrow the scope in the NEPA alternatives analysis process.

If the PEL study was adopted more than 5 years before the NEPA document, a review of the PEL analysis for any class of NEPA document (CE, EA, or EIS) should be completed. The NEPA document will need to assess all the alternatives that met the project purpose and need and confirm that conditions or policies and guidance that would affect the analysis and recommendations have not changed.

It is important to remember that although a PEL study may recommend alternatives for implementation or elimination, the final determination regarding eliminated and preferred alternatives is made during the NEPA process.

5.5 Incorporating Environmental Screening Data

Chapter 3.0 describes the Existing Conditions and Environmental Scan Report as well as screening conducted for PEL studies. The level of detail for PEL study Existing Conditions and Environmental Scan Reports vary. Even the most detailed PEL studies do not address all of the requirements of NEPA and other environmental regulations, but rather aim to help focus future NEPA analysis on important issues and resources relevant to a specific project area and NEPA decision. The goal of a PEL screening is to identify environmental and other project constraints—such as project schedule and costs—that may affect future NEPA decisions; potential project impacts; and potential avoidance, minimization, and mitigation strategies or measures.

A PEL study environmental screening should balance the collection of environmental data with the timeframe for project development. In most cases, the PEL study should compile readily available data

about environmental and social conditions, identify resources that may require avoidance or minimization of impacts during alternatives development, and recommend the likely level of analysis that will be required in the NEPA process, including identifying resources that have lengthy environmental clearance processes.

As with other project information, environmental data and analyses completed during the PEL study provide useful context to the NEPA process. While many environmental and social resources will require additional analysis during NEPA, the PEL study may narrow and better define the scope of the NEPA process by (1) identifying the level of detailed analysis needed for each resource, and (2) providing recommendations for the methods and schedule for additional analyses that will be required during NEPA.

To assist with the transition to the NEPA process, the PEL Questionnaire requires documentation of the following:

- Existing conditions of all resources reviewed
- Level of detail and methodology of review
- Issues that need to be considered during the NEPA process, including potential resource impacts and mitigation strategies or requirements
- Supplemental data that will be needed during the NEPA process
- Documentation of resources that were not reviewed in the PEL study and why
- Whether non-reviewed resources need review under NEPA

This information feeds directly into the ITD NEPA scoping process. If a PEL study was adopted within 5 years of the NEPA process, the resource information gathered during the PEL study can be incorporated into the NEPA document and supplemented as needed, to fulfill the requirements of NEPA and other environmental regulations. If the NEPA process is initiated more than 5 years after the adoption of a PEL study, the PEL study's resource information will need to be validated, updated, and supplemented during the NEPA process. The PEL study information can, nonetheless, help focus the NEPA analysis on those resources that are most likely to need avoidance, minimization, or mitigation and that may affect the project design, schedule, or budget.

5.6 Incorporating Input from Resource and Regulatory Agencies

NEPA requires the involvement of federal, state, and local agencies in the development of EISs and EAs. For CEs, the lead agency should identify any aspects of the project that might require coordination with other agencies. Other environmental laws are also addressed during the NEPA process, such as the Clean Water Act (CWA), Endangered Species Act (ESA), or the National Historic Preservation Act (NHPA), and these laws require the involvement of regulatory agencies that oversee and/or enforce the laws.

Unlike under NEPA, agency involvement in a PEL study is voluntary on the part of the agency. As described in Chapter 3.0, a PEL study should invite participation by federal, state, and local agencies with jurisdiction by law or special expertise with issues related to the study area. These agencies may provide comments during a PEL study on environmental issues and potential project impacts; however, because a PEL study is a planning-level study, no legally binding agreements or decisions are made with any agencies.

The PEL study documentation and PEL Questionnaire will provide specific information about how

resource and regulatory agency input should be used during the NEPA process, including:

- What steps should be taken with each agency during NEPA scoping.
- Whether unresolved issues exist with any agencies.
- How to use PEL study information when coordinating with agencies during the NEPA process.
- Critical issues identified by agencies during the PEL study that need consideration in the NEPA process.
- Agency input on mitigation strategies that should be analyzed during NEPA.

Agency input during the PEL study allows NEPA project teams to more accurately scope the NEPA analysis, with an understanding of how and when the NEPA process should involve agencies and what issues of agency concern will need to be evaluated in more detail. Agency involvement during a PEL study also streamlines the NEPA process because agencies are familiar with the project and their concerns have been considered in project planning before starting preliminary design and NEPA. This can lead to enhanced decision-making and more efficient solutions.

5.7 Incorporating Input from the Public

NEPA requires the involvement of the public, including interested groups and individuals, in the development of EISs and EAs. For CEs, the lead agency should identify any aspects of the project that might require coordination with interested groups or individuals.

A PEL study should also involve the public, with the goal of soliciting community input on steps such as the purpose and need statement, alternatives development and screening, environmental analysis, and mitigation strategies.

The PEL study documentation will provide specific information about when and how public input was obtained, how it helped shape the recommended alternative(s) and analysis, and how it should be used during the NEPA process. The PEL Questionnaire will provide information about how to use the public input in subsequent NEPA studies, including the following:

- Whether any unresolved issues exist for the public or stakeholders.
- How to use PEL study information when coordinating with the public during the NEPA process.
- Critical issues identified by the public that need to be considered in the NEPA process.

This information about the PEL public involvement process will enable the NEPA project team to more accurately scope the NEPA analysis, with an understanding of whether any outstanding or critical issues need to be considered or whether any particular types of outreach techniques should be continued from the PEL study to the NEPA analysis.



CHAPTER HIGHLIGHTS

- *PEL studies should not conduct so much data gathering and analysis that they become a NEPA document in all but name*
- *Collaboration and Clear Communication is key for the project team and consultants*
- *Ensure that the PEL documents are developed in a way that is consistent with the NEPA process for a more or less seamless transition*



PEL KEY TAKEAWAYS

Strong project management from ITD and the consultant, if applicable, is needed to keep studies focused and moving forward. Consider the following when undergoing a PEL study:

Scoping for the PEL Study

➤ PEL studies should not conduct so much data gathering and analysis that they become a NEPA document in all but name. PEL studies are meant to improve decision-making at a broad level and to inform future actions. PEL studies do not need to be as detailed as NEPA documents and keeping them at a higher level of analysis will reduce later duplication of effort.

Communication with Stakeholders

- Studies should focus on quality of communication between the project team and stakeholders, particularly for important project information. ITD and the project team should provide clear and concise messaging to ensure that consistent information is presented to stakeholders. Poor and inconsistent communication may lead to friction and misunderstandings.
- ITD and the project team should clearly state the desired study goals and outcomes to local agencies and obtain local agency agreement with these goals early in the study. The desired study goals and outcomes should then be reiterated to the local agencies at each major milestone, so everyone remains in agreement and aware of the study's focus. Conducting an optional visioning session (to define these goals) at the start of the study and early in the process can set the stage for consensus building and may help keep agencies and ITD better focused on the same outcomes.
- PEL studies are successful with extensive stakeholder coordination, but ITD and the project team should be aware of accommodations made regarding stakeholder desires unrelated to the overall

focus of the study, which can detract from the central purpose and delay progress; these tangential issues can also inflate the scope of the study. ITD and the project team should work to keep stakeholder discussions focused on issues related to the study's central goals.

Travel Demand and Traffic Modeling

- Travel demand and traffic model details should be discussed with and agreed upon by FHWA as early as possible in the study, with early stakeholder endorsement of these details. The following items should be agreed upon by ITD and FHWA: existing and future years for the traffic model; tools (software); techniques (meso, micro, macro); and measures of effectiveness. Documenting these details in a white paper to FHWA is helpful.
- Because the alternatives analysis requires measures of effectiveness related to the study's goals and objectives, it is critical that studies select modeling tools that can quantify the appropriate measures for the study.
- PEL studies should consider providing a single traffic analysis report, rather than dividing the traffic analysis between the Existing Conditions and Environmental Scan Report and the PEL document (with traffic forecasts and alternatives evaluation).
- Level of failure analysis based on interim traffic projections (i.e., between existing conditions and design year) can be very helpful for prioritizing projects and funding.

Coordination with FHWA

- The project team can help FHWA provide timely reviews by including an executive summary of reports that highlight key points needing FHWA attention.
- Determine early in the study that the specific activities within the FHWA Coordination Points will involve FHWA and obtain agreement on these activities from both FHWA and key project team members.
- Highlight and clarify the relationship with other projects, especially federal projects in the PEL study area.
- Receive FHWA acceptance of the final PEL study in a formal letter.

Design and Recommendations

- Discuss conceptual alternative designs with stakeholders before evaluation to keep ITD and stakeholders moving forward together. Stakeholder input improves the ability of the alternatives to meet both stakeholder and transportation needs.
- Provide cost estimates in a format that can be easily adapted to different packaging scenarios. For example, providing costs for individual alternative components allows small projects to be mixed and matched easily in different packages.

Transitioning to the NEPA Process

- The District/local agencies should revisit the intended class of NEPA action with ITD HQ before developing the scope of work for a follow-on NEPA process. Although the PEL study may have identified certain classes of NEPA action for different improvements within the PEL study's recommendation, the class of action could change if the proposed action or project limits change. Discussing the class of action with ITD HQ can allow the Districts/local agencies to properly

scope the projects before moving forward with the NEPA process.

- Be mindful of the time between the PEL study and transition into the NEPA process to ensure that PEL studies and their analyses do not become stale (generally, 5 years or less between PEL and NEPA processes).
- Do not force a single recommendation into NEPA if more than one alternative can meet the purpose and need.
- Because corridor PEL studies are often made up of smaller projects and not one large improvement, creating “fact sheets” for each project could be a valuable tool. These fact sheets would have the conceptual design, overall project goal, purpose and need requirements, any necessary permitting/environmental documentation, estimated costs, and a brief summary of other alternatives considered. These fact sheets would provide the Districts/local agencies a quick reference for projects to advance, without having to search through the PEL documentation.

PEL Documentation

- Ensure that the PEL documents are developed in a way that is consistent with the NEPA process for a more or less seamless transition.
- Make sure to maintain all PEL documentation in the ProjectWise folder. This includes copies of all correspondence, outreach materials (in all languages provided), public comment, etc. These documents will be critical when the PEL transitions into the NEPA phase.



7

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23 U.S.C. 168: <https://www.govinfo.gov/app/details/USCODE-2021-title23/USCODE-2021-title23-chap1-sec168>

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APPENDIX A: FHWA PEL Questionnaire



PEL QUESTIONNAIRE

Instructions: *These questions should be used as a guide throughout the planning process, not just answered near completion of the process. When a PEL study is started, this questionnaire will be given to the project team. Some of the basic questions to consider are: “What did you do?” “What didn’t you do?,” and “Why?”. When the team submits a PEL study to FHWA for review, the completed questionnaire will be included with the submittal. FHWA will use this questionnaire to assist it in determining if the study meets the requirements of 23 CFR §§ 450.212 or 450.318. The questionnaire should be included in the planning document as an executive summary, chapter, or appendix.*

1. Background:

- a. Who is the sponsor of the PEL study? (state DOT, Local Agency, Other)
- b. What is the name of the PEL study document and other identifying project information (e.g. sub-account or STIP numbers, long-range plan, or transportation improvement program years)?
- c. Who was included on the study team (Name and title of agency representatives, consultants, etc.)?
- d. Provide a description of the existing transportation facility within the corridor, including project limits, modes, functional classification, number of lanes, shoulder width, access control and type of surrounding environment (urban vs. rural, residential vs. commercial, etc.)
- e. Provide a brief chronology of the planning activities (PEL study) including the year(s) the studies were completed.
- f. Are there recent, current, or near future planning studies or projects in the vicinity? What is the relationship of this project to those studies/projects?

2. Methodology used:

- a. What was the scope of the PEL study and the reason for completing it?
- b. Did you use NEPA-like language? Why or why not?
- c. What were the actual terms used and how did you define them? (Provide examples or list)
- d. How do you see these terms being used in NEPA documents?
- e. What were the key steps and Coordination Points in the PEL decision-making process? Who were the decision-makers and who else participated in those key steps? For example, for the corridor vision, the decision was made by state DOT and the local agency, with buy-in from FHWA, the USACE, and USFWS and other resource/regulatory agencies.
- f. How should the PEL information be presented in NEPA?

3. Agency Coordination:

- a. Provide a synopsis of Coordination with Federal, tribal, state and local environmental, regulatory and resource agencies. Describe their level of participation and how you coordinated with them.
- b. What transportation agencies (e.g. for adjacent jurisdictions) did you coordinate with or were involved during the PEL study?
- c. What steps will need to be taken with each agency during NEPA scoping?

4. Public Coordination:

- a. Provide a synopsis of your Coordination efforts with the public and stakeholders.

5. Purpose and Need for the PEL study:

- a. What was the scope of the PEL study and the reason for completing it?
- b. Provide the purpose and need statement, or the corridor vision and transportation goals and objectives to realize that vision.
- c. What steps will need to be taken during the NEPA process to make this a project-level purpose and need statement?

6. Range of alternatives:

Planning teams need to be cautious during the alternative screen process; alternative screening should focus on purpose and need/corridor vision, fatal flaw analysis, and possibly mode selection. This may help minimize problems during discussions with resource agencies. Alternatives that have fatal flaws or do not meet the purpose and need/corridor vision will not be considered reasonable alternatives, even if they reduce impacts to a particular resource. Detail the range of alternatives considered, screening criteria, and screening process, including:

- a. What types of alternatives were looked at? (Provide a one or two sentence summary and reference document.)
- b. How did you select the screening criteria and screening process?
- c. For alternative(s) that were screened out, briefly summarize the reasons for eliminating the alternative(s). (During the initial screenings, this generally will focus on fatal flaws.)
- d. Which alternatives should be brought forward into NEPA and why?
- e. Did the public, stakeholders, and agencies have an opportunity to comment during this process?
- f. Were there unresolved issues with the public, stakeholders, and/or agencies?

7. Planning assumptions and analytical methods:

- a. What is the forecast year used in the PEL study?
- b. What method was used for forecasting traffic volumes?
- c. Are the planning assumptions and the corridor vision/purpose and need statement consistent with each other and with the long-range transportation plan? Are the assumptions still valid?
- d. What were the future year policy and/or data assumptions used in the transportation planning process related to land use, economic development, transportation costs, and network expansion?

8. Environmental resources (wetlands, cultural, etc.) reviewed. For each resource or group of resources reviewed, provide the following:

- a. In the PEL study, at what level of detail was the resource reviewed and what was the method of review?
 - b. Is this resource present in the area and what is the existing environmental condition for this resource?
 - c. What are the issues that need to be considered during NEPA, including potential resource impacts and potential mitigation requirements (if known)?
 - d. How will the planning data provided need to be supplemented during NEPA?
- 9. List environmental resources you are aware of that were not reviewed in the PEL study and why. Indicate whether or not they will need to be reviewed in NEPA and explain why.**
- 10. Were cumulative impacts considered in the PEL study? If yes, provide the information or reference where the analysis can be found.**
- 11. Describe any mitigation strategies discussed at the planning level that should be analyzed during NEPA.**
- 12. What needs to be done during NEPA to make information from the PEL study available to the agencies and the public? Are there PEL study products which can be used or provided to agencies or the public during the NEPA scoping process?**
- 13. Are there any other issues a future project team should be aware of?**
- a. Examples: Controversy, utility problems, access or ROW issues, encroachments into ROW, problematic landowners and/or groups, contact information for stakeholders, special or unique resources in the area, etc.

APPENDIX B: ITD PEL Resource List



Planning and Environmental Linkages Resource List

Project Name: _____ **Key Number:** _____

This resource list is intended for use on PEL studies only. The analysis required for National Environmental Policy Act (NEPA) projects is more detailed and constrained by regulatory requirements. The following items are explanations for the cells in the table below.

Lead Team Member - “**ITD District**” indicates that ITD’s District staff will be responsible for investigation, analysis, and/or documentation. “**ITD HQ ENV**” indicates that ITD HQ Environmental Services staff will be responsible for investigation, analysis, and/or documentation. “**Consultant**” indicates that the consultant team will be responsible for investigation, analysis, and/or documentation. Please note one person may be responsible for investigation and/or analysis, while another is responsible for documentation. Include team member’s name and firm (if applicable).

Level of analysis and documentation required - PEL does not require an exhaustive list of environmental resources to be analyzed (this is what NEPA addresses). “**None**” indicates that the resource is not present or is present, but analysis is not necessary. “**Brief**” indicates that the resource is present and may have regulatory, schedule, or cost implications for alternatives that come out of the PEL process, and only some analysis and documentation is necessary. “**Full**” indicates that the resource is crucial to decision making during the PEL process, further investigation and coordination will be needed during NEPA. “**Complete**” indicates that analysis has been completed as part of another study and will be summarized in this study.

Comments – Briefly describe what is currently known about this resource and if any coordination has already been completed. Describe the intended effort for the data collection and analysis. Also indicate if any analysis has been completed as part of another study.

TOPICS	CONSIDERATIONS
Design	Lead team member- ITD District OR Consultant
	Level of design required (describe level of conceptual design needed)-
	Comments-
Safety Analysis	Lead team member- ITD District OR Consultant
	Level of analysis required -
	Comments (previously completed work?)-
Operational Analysis	Lead team member- ITD District OR Consultant
	Level of analysis required (type of model)-
	Comments (previously completed work?)-

Environmental Resources Usually Considered during a PEL	
Transportation Resources	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Floodplains	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Hazardous Materials	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Historic Properties	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Land Use	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Noise	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Water Quality	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Air Quality and Greenhouse Gases	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Parks, Trails, and Open Space Resources	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Environmental Justice and Equity	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief OR Full OR Complete
	Comments-
Environmental Resources Sometimes Considered during a PEL (Project-Specific Basis)	
Social and Economic Resources	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief Full OR Complete
	Comments-
Section 4(f) Evaluation	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief Full OR Complete
	Comments-
Section 6(f) Evaluation	Lead team member- ITD District OR ITD HQ ENV OR Consultant
	Level of analysis and documentation required- None OR Brief Full OR Complete
	Comments-

APPENDIX C: Example FHWA and ITD Acceptance Letters and Resource Agency Letters

Example FHWA PEL Acceptance Letter



U.S. Department
of Transportation
**Federal Highway
Administration**

Idaho Division
December 29, 2020

3050 Lakeharbor Lane, Suite 126
Boise, Idaho 83703
208.334.9180 - P
208.334.1691 - F
Idaho.FHWA@dot.gov

In Reply Refer To:
HDA-ID

Mr. Brian W. Ness, Director
Idaho Transportation Department
P. O. Box 7129
Boise, ID 83707

ATTN: Jason Minzghor, District Engineer

Subject: KN 20065, I-15, US-20 Connector Study

Dear Mr. Ness:

This letter is to acknowledge the receipt of the I-15/US-20 Connector Planning and Environmental Linkages (PEL) study and the associated PEL Questionnaire on November 10, 2020. The PEL effort was undertaken by the Idaho Transportation Department (ITD) in cooperation with Bonneville County and the Bonneville Metropolitan Planning Organization (BMPO). The Idaho Division commends ITD for embracing this collaborative approach to consider long-range transportation improvements in the study area.

This planning study for potential improvements to six interchanges on I-15 and US-20 in Idaho Falls, Idaho, was undertaken in a manner consistent with the Federal Highway Administration (FHWA) PEL guidance. Through this process, the evaluation and findings of the PEL study may be applied to subsequent National Environmental Policy Act (NEPA) process and documentation. These streamlining efforts likely will result in time and cost savings on future NEPA studies conducted within the study area.

The completed PEL Questionnaire submitted to FHWA on November 10, 2020 provides a good summary of the work completed in the PEL study and the information that will be needed once projects enter the NEPA process. As individual projects are initiated and funding becomes available, it will be necessary for FHWA to meet with ITD, Bonneville County, and the BMPO on a project-by-project basis to determine the scope of the NEPA study, including the level of study required, purpose and need, logical termini, and the extent to which this PEL study can be used to supplement or replace certain milestones in the NEPA process.

Should you have any questions please feel free to contact Lisa Applebee, Operations Engineer, at lisa.applebee@dot.gov or 208-334-9180 ext. 112.

Sincerely,

**PETER J
HARTMAN**

Digitally signed by
PETER J HARTMAN
Date: 2020.12.29
09:51:29 -07'00'

Peter J. Hartman
Idaho Division Administrator

cc: John A. Perry, FHWA
Brent Inghram, FHWA
Lisa Applebee, FHWA
Dan McElhinney, ITD
Karen Hiatt, ITD
Ryan Day, ITD

Example ITD Headquarters Environmental Services Manager PEL Acceptance Letter



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**IDAHO TRANSPORTATION
DEPARTMENT**

P.O. Box 7129 • Boise, ID 83707-1129
(208) 334-8000 • itd.idaho.gov

(Month Day, Year)

(District Project Manager)
Idaho Transportation Department, District (#)
(Enter ITD District Address)
(City), Idaho (Zip Code)

Subject: (Project Name) Planning and Environmental Linkages (PEL) Study

Dear (District Project Manager):

This letter is in response to your request for Idaho Transportation Department (ITD) Environmental Services Manager acknowledgement of the (Project Name) PEL Study undertaken by District (#). We have appreciated the opportunity to participate in this process as a member of the Technical Advisory Committee (TAC) and commend the efforts of everyone involved in conducting this study in a manner consistent with Federal Highway Administration (FHWA) and ITD PEL guidance. The benefits of this streamlining effort will undoubtedly be realized in terms of time and costs savings on future National Environmental Policy Act (NEPA) studies conducted with the study limits.

The completed PEL Questionnaire submitted to ITD HQ in (Month Year) provides a good summary of the work completed in the PEL study and the information that will be needed once projects enter into the NEPA process. As individual projects are initiated and funding becomes available, it will be necessary for the District to engage the District Environmental Planners on a project by project basis to determine the scope of the NEPA analysis and the extent to which the PEL can be used to supplement the NEPA effort. Further coordination with HQ Environmental Planners may be needed.

These documents are in accordance with FHWA Coordination Points as part of the PEL process. We look forward to future coordination associated with the (Project Name) PEL Study. If you have any questions regarding this letter, please feel free to contact me at (phone number) or (ITD HQ Environmental Services Manager Name email address).

Sincerely,

(Name)
ITD Environmental Services Manager

Cc: (Name of District Engineer), ITD District 6
(Name of FHWA Engineer), FHWA
(Name of Consultant Lead), (Name of Consultant Company)

Example Resource Agency PEL Initiation Letters



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(Month Day, Year)

(USACE Liaison Name)
US Army Corps of Engineers
Walla Walla District
720 E. Park Blvd, Suite 245
Boise, ID 83712

RE: (Project Name) Planning and Environmental Linkages (PEL) Study

Dear (USACE Liaison Name):

The Idaho Transportation Department (ITD) District (#) office, in consultation with the Federal Highway Administration (FHWA), is informing you that the (Project Name) PEL Study is underway. The PEL study will be conducted in accordance with the Statewide and Metropolitan Planning Regulation 23 CFR 450, the provisions linking planning and National Environmental Policy Act (NEPA) presented in Section 450.318 and Appendix A of 23 CFR 450. We will be communicating with you in the coming months about your participation in the process.

The (Project Name) PEL is being conducted to identify (*Identify any of the following:* existing conditions, to identify anticipated problem areas, and to develop/evaluate multimodal improvements that will address safety, reduce congestion, improve mobility and travel time reliability) within the study corridor.

The study area, shown in the attached map, contains high-density residential and commercial, along with some low-density residential and agricultural land use. The study area consists of (Name of the corridor area).

ITD is leading the study and has retained (Name of Consultant Company) to facilitate the process and develop the PEL Study. The PEL study will examine alternatives to address safety, congestion and improved mobility and travel time reliability compared to the No Action Alternative. The PEL study will include development and screening of alternatives based on a consideration of Purpose and Need; access, traffic, planning, and environmental factors; the location of community and other developed areas, and public and agency plans and input. Coordination has begun with local agencies and other stakeholders in the corridor to gather available data.

The (Name of Consultant Company) team has consulted ITD during scoping to identify initial resource concerns. Your agency will be invited to review and comment on the existing conditions report,

anticipated to be finished in (Season Year). Your involvement is valuable as we proceed through the PEL study process.

Please contact me at (phone number) or at (District Project Manager email address) with any questions or comments you have about the project. The latest information will be posted on the projects website: [\(project website\)](#)

Please forward this information to the appropriate individual if you feel you are not the correct recipient. I look forward to your participation and thank you for your cooperation.

Sincerely

(District Project Manager)

Cc: (Name of ESM), ITD HQ ESM
(Name of District Engineer), ITD District 6
(Name of FHWA Engineer), FHWA
(Name of Consultant Lead), (Name of Consultant Company)

Attachment: Study Area Map

Example Resource Agency PEL Existing Conditions and Environmental Scan Report
Review Request



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DEPARTMENT**

P.O. Box 7129 • Boise, ID 83707-1129
(208) 334-8000 • itd.idaho.gov

(Month Day, Year)

(USACE Liaison Name)
US Army Corps of Engineers
Walla Walla District
720 E. Park Blvd, Suite 245
Boise, ID 83712

RE: (Project Name) Planning and Environmental Linkages (PEL) Study Conditions Report Ready for Review

Dear (USACE Liaison Name):

The purpose of this letter is to inform you that the Idaho Transportation Department (ITD) District (#) office, in consultation with the Federal Highway Administration (FHWA) have completed the Existing Conditions and Environmental Scan Report, which contains documented environmental existing conditions for the (Project Name) PEL Study. In a letter sent on (month day, year), ITD introduced the PEL study and committed to an opportunity for your agency to review and comment on the Existing Conditions and Environmental Scan Report.

The Existing Conditions and Environmental Scan Report and appendices area available for your review at the following link: (document sharing link)

If your review of the Report results in comments, please submit those comments using the comment matrix located at the same link above by close of business on (day of week), (month, day, year) and those comments will be considered and responded to ahead of the publication of the document. If you have no comments after the review, please let me know as well.

Please forward this information to the appropriate individual if you feel you are not the correct recipient. I look forward to your participation and thank you for your cooperation.

Sincerely

(Name of District Project Manager)

Cc: (Name of ESM), ITD HQ ESM
(Name of District Engineer), ITD District 6
(Name of FHWA Engineer), FHWA
(Name of Consultant Lead), (Name of Consultant Company)

April 2024

C-11



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IDAHO TRANSPORTATION DEPARTMENT

P.O. Box 97 • Rigby, ID 83442-0097

(208) 745-7781 • itd.idaho.gov

December 21, 2017

Department of Environmental Quality

Troy Saffle

Troy.saffle@deq.idaho.gov

Subject: I-15/U.S. 20 Planning and Environmental Linkages Study Environmental Advisory Committee

Dear Agency:

This letter is to request Department of Environmental Quality's participation in the Environmental Advisory Committee for the Idaho Transportation Department's (ITD) Planning and Environmental Linkages (PEL) Study of approximately 6 miles of the I-15/U.S.20 corridor in Idaho Falls (see online map here) <http://arce.is/2BWGOhS>

ITD is doing this study to determine how mobility and safety can be improved along this corridor to best serve all users including travelers from Idaho Falls, Bonneville County and other freight, tourist and through traffic.

What is a PEL?

A PEL is a federally defined planning process with regulations addressing practices and authorities in 23 CFR 450.212 and 450.318. It is a study that engages resource agencies early in the planning process to identify environmental, community, and economic goals early in the planning process, to protect important resources, and streamline future project development activities. A PEL study prepares planning efforts for integration into future NEPA processes and can help minimize duplication of effort, identify the most cost effective solutions, provide environmental stewardship, and reduce delays in project implementation.

Study Information

The I-15/U.S. 20 corridor has been the focus of several past studies by ITD and Bonneville Metropolitan Planning Organization (BMPO). Their member agencies have identified that the I-15 interchanges at Exits 118 and 119 on I-15, as well as U.S.20 interchanges at Lindsay Blvd, Riverside Drive, and Science Center Drive are, becoming a bottleneck and safety concern on the state system. All of these studies have identified addressing Exit 119 at I-15/U.S. 20 interchange area as a top priority.

The BMPO and ITD sponsored a study in May of 2011, (Transportation Systems Alternatives study and Arterial Loop Assessment). These previous studies looked at needs likely to emerge over several years of growth and development. To address future congestion on main arterials in the developed parts of the metropolitan area, two sets of peripheral roadway belts were recommended. This planning effort will also include a look at outer High Capacity Roadway and determine the benefits or solutions they could provide as alternatives are developed.

In this corridor, outdated infrastructure is affecting safety, mobility, and economic opportunity in the city, county, and region. The amount of traffic traveling the U.S. 20 corridor from Idaho Falls to Montana has grown significantly, and the projections show that the area will be in gridlock within the next 10 years. The majority of the traffic traveling north on I-15 exits the highway at Exit 119 onto U.S. 20 to reach destinations from north Idaho Falls to Yellowstone and Grand Teton National Parks.



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The project study area will include six interchanges along I-15 and U.S. 20 encompassing I-15 and Broadway (Exit 118) on the south and continuing through U.S. 20 at Lewisville (Exit 310) at the north. The primary study area is expected to include a zone extending approximately 500 feet on either side of the existing roadway centerline. A secondary study area will be evaluated for potentially new alignments, interchanges, local system modification, or other improvements.

The PEL Study is expected to take place over the next 18 months and will consider conditions in the project area and establish possible options to address identified issues. The timeframe for study will consider a horizon year of 2045 for traffic projections as well as other environmental planning considerations. To date, no funding for this project has been secured in the near term. However ITD is anticipating funding will be available for potential initial improvements as early as 2023.

Upcoming Process

The ITD project team includes consulting support from HDR Engineering, Inc., and Horrocks Engineers. This team is already collecting traffic, safety, and mobility data, infrastructure conditions, and stakeholder input. The next step is to define the environmental resources of concern and the appropriate level of analysis and investigation to conduct as part of this PEL Study. This information will be used to develop a Purpose and Need statement, identify evaluation criteria, and develop and screen a range of alternatives to achieve that Purpose and Need.

The PEL offers an important opportunity for agencies to provide input early in the project development in order to better identify issues and streamline potential future NEPA scoping and reviews. However, agency participation is voluntary and no final decision from the agency will be required.

We invite you to participate in our Environmental Advisory Committee for this PEL Study. The first meeting for this group will be the PEL Environmental Scoping Meeting on January 16th, 2018 from 1:00-3:30 in Idaho Falls (video conferencing will be set up). If someone from your agency can participate, please respond to ITD Project Manager Karen Hiatt or HDR Project Manager Tracy Ellwein, by January 4, 2018. You may contact Karen or Tracy at either the phone numbers or email addresses provided below and we will provide additional project information and meeting logistics to that point of contact in the near future.

Thank you and we look forward to engaging your agency on this important project.

Sincerely yours,

Digitally signed by Karen Hiatt
Date: 2017.12.21 14:26:07
-07'00'

Karen Hiatt, P.E.
Project Manager
Idaho Transportation Department
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September 16, 2019

Shane Skaar
US Army Corps of Engineers
Walla Walla District
720 E. Park Blvd, Suite 245
Boise, ID 83712

Email: shane.k.skaar@usace.army.mil

RE: KN20065 I-15/US-20 Safety and Mobility Project – Alternatives Screening

Dear Mr. Skaar,

The Idaho Transportation Department (ITD) is working on a Planning and Environmental Linkages (PEL) Study in the I-15 and US-20 area in Bonneville County. The goal of the PEL is to develop a range of alternatives to address congestion and safety issues and recommend an alternative or alternatives to move forward into a NEPA study. A draft project purpose, need and project goals were developed at the beginning of the study and used to develop concept level alternatives. Each alternative was reviewed and rated with the screening criteria questions for each screening level. Details and alternative exhibits for the Level One and Level Two screening are further discussed in the Screening Summary reports, located on the project website at the following link <https://i15us20connector.com/#resources>.

As requested by the ACOE at our June 26, 2019 meeting, we are providing supplemental information for each of the Level One and Level Two alternatives for estimated fill impacts to wetlands and Waters of the United States (WOTUS). These estimated impacts are at a macro level as the alternatives are at a planning level effort and to date, ITD has not conducted field surveys. To estimate the impacts, assumptions were made on each alternative's proposed bridge spans, column spacing, and bridge type, number of in-water piers and abutment locations and sizes. Approximate wetland locations were taken from National Wetland Inventory maps (while we examined Natural Resources Conservation Service soil maps for additional data in estimating the presence of wetlands, no hydric soils have been mapped by NRCS in the project area).

The attached tables highlight the Level One and Level Two alternatives and summarizes their approximate impacts to wetlands and WOTUS in total area.

Level One and Level Two screenings resulted in four remaining alternatives, including the no-build, recommended for further development and advancement to Level Three of the PEL study.

ITD requests your review of the Level One and Level Two summary reports and the supplemental tables provided. Please provide comments back to me by October 16, 2019. If you have any questions, please feel free to contact me.

Sincerely,

Ryan Day
Project Manager
ryan.day@itd.idaho.gov
208-745-5659

Example Resource Agency PEL Existing Conditions and Environmental Scan Report
Review Response



United States Department of the Interior

IDAHO FISH AND WILDLIFE OFFICE

Eastern Idaho Field Office
4425 Burley Dr., Suite A
Chubbuck, Idaho 83202
Telephone (208) 237-6975
<http://IdahoES.fws.gov>



Ryan Day, Project Manager
Idaho Transportation Department
206 North Yellowstone Highway
Rigby, Idaho 83442

Subject: Letter of Support Planning and Environmental Linkages I-15/U.S.-20 Connector Project

Dear Mr. Day:

The Idaho Transportation Department (ITD) is working with the City of Idaho Falls and Bonneville County to study ways to improve I-15 and U.S.-20 to better serve Idaho Falls and the growing region. The Fish and Wildlife Service (Service), in partnership with ITD, has long supported public safety. The I-15/U.S.-20 Connector Project will accommodate growth in the community, provide pedestrian and bicycle mobility in the area, reduce congestion, and address unsafe travel conditions. The Service has been engaged with the I-15/U.S.-20 Connector Project Planning and Environmental Linkages (PEL) study process as described below.

The Service provided our input at the following PEL meetings:

- July 9, 2019 –Environmental Advisory Committee Meeting
- March 11, 2020 –Environmental Advisory Committee Meeting

The Service employee who has participated in the PEL process to date is:

Evan Ohr Fish and Wildlife Biologist (208) 237-6975 ext. 115 Evan_ohr@fws.gov

Through our participation, we found the PEL process helpful in the alternatives decision making process. As the project moves into the NEPA phase, we are committed to provide continued support and participation in the process. We look forward to working closely with ITD on the continued progress of the I-15/U.S.-20 Connector Project.

Sincerely,

Sandra M Fisher

For Christopher Swanson
Acting State Supervisor

cc: HDR, (J. Longsdorf, S. Borders)

INTERIOR REGION 9 COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA*, OREGON*, WASHINGTON

*PARTIAL

INTERIOR REGION 12 PACIFIC ISLANDS

AMERICAN SAMOA, GUAM, HAWAII, NORTHERN
MARIANA ISLANDS

Example Resource Agency Final PEL Study Notification of Completion



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(Month Day, Year)

(USACE Liaison Name)
US Army Corps of Engineers
Walla Walla District
720 E. Park Blvd, Suite 245
Boise, ID 83712

RE: (Project Name) Planning and Environmental Linkages (PEL) Study

Dear (USACE Liaison Name):

Idaho Transportation Department (ITD) District (#) office, in consultation with the Federal Highway Administration (FHWA) have prepared this PEL study to evaluate transportation improvements along (Name of corridor roadway) in and around (City or County Name). Since our initial Technical Advisory Committee (TAC) meeting on (Month day, year) ITD has conducted periodic check-ins with FHWA to review and provide input on the (Project Name) PEL study. This report is an outcome of our collaborative efforts.

The (Project Name) PEL Study and associated technical reports are published on the project website ([project website address](#)). If you have any questions please contact me at (phone number) or at (District Project Manager email address) with any questions or comments you have about the project.

Sincerely

(District Project Manager Name)

Cc: (Name of ESM), ITD HQ ESM
(Name of District Engineer), ITD District 6
(Name of FHWA Engineer), FHWA
(Name of Consultant Lead), (Name of Consultant Company)

APPENDIX D: Example Existing Conditions/Environmental Scan

Alaska Department of Transportation, Planning and Environmental Linkages (PEL) Study Report: Egan Drive and Yandukin Drive Intersection Improvements (August 2021) [E-Y PEL Environmental Overview \(alaska.gov\)](#)

Colorado Department of Transportation: I-25 Central Planning & Environmental Linkages (PEL) Study (April 2020) [i25pel-studyreport.pdf \(codot.gov\)](#) (Chapter 4)

APPENDIX E: Example Full PEL Study Table of Contents

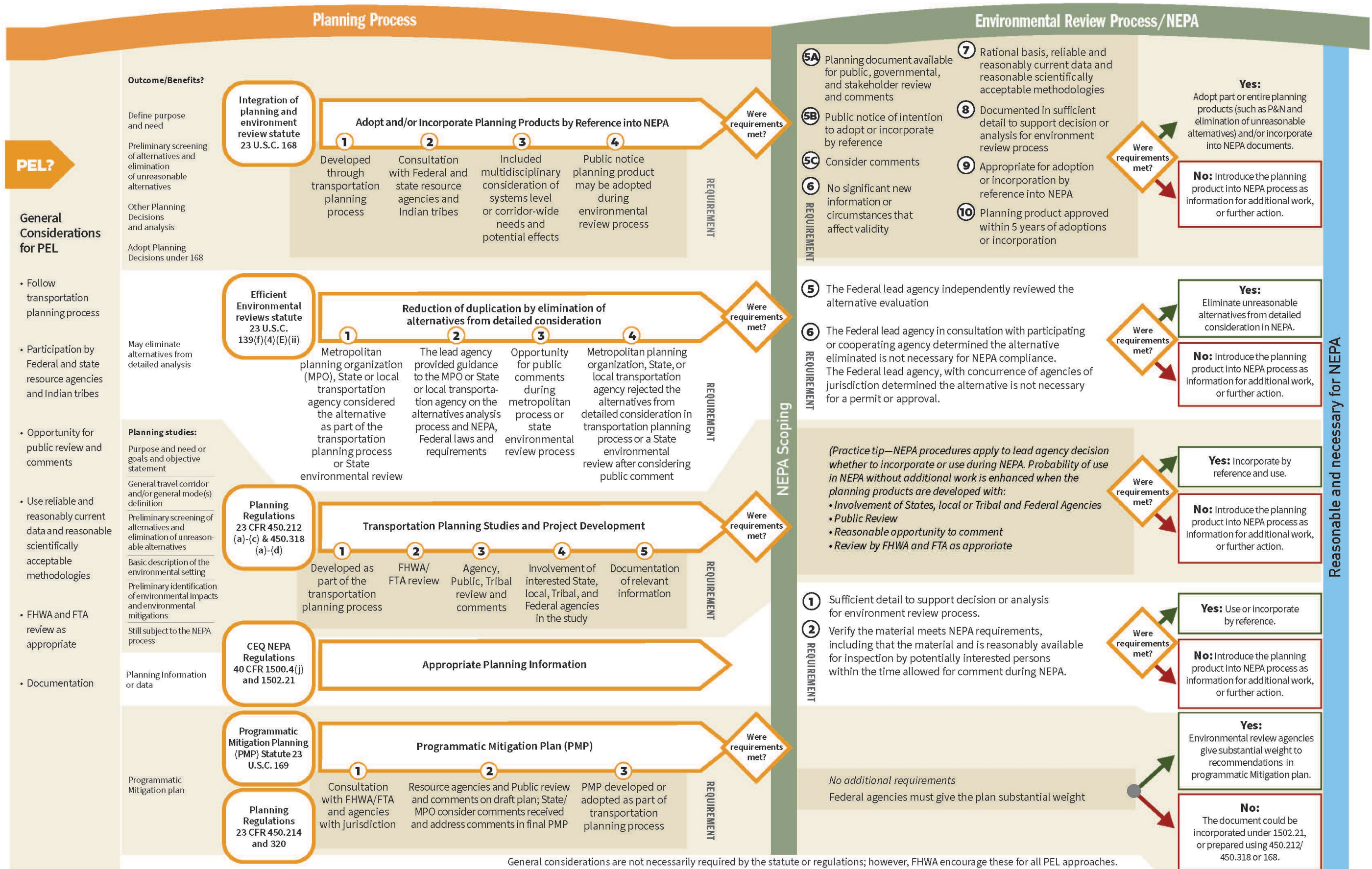
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- Appendix A FHWA Planning and Environmental Linkages Questionnaire
- Appendix B Existing Conditions and Environmental Scan Report
- Appendix C Operations Analysis Technical Report
- Appendix D Alternatives Development and Screening Technical Reports
- Appendix E Recommended Alternative(s), Cost Estimates and Conceptual Design Plan Set
- Appendix F Agency Coordination and Public Involvement

APPENDIX F: PEL Flow Chart



APPENDIX G: Additional Resources and References

Web Sources/Links

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