

# SPR-17: Planning and Environmental Linkages

For Regions

1-15 points

**Goal:** Integrate system planning process information, analysis, and decisions with the project-level environmental review process, and reference it in NEPA documentation.



## Sustainability Linkage

The NEPA process encompasses all of the triple bottom line principles, typically at the project level. This criterion ensures that information and decisions made in the system planning process generate useful information regarding sustainability impacts, and that data and those sources are consistent between system-level and project-level planning.

## Background and Scoring Requirements

### Background

The intent of this criterion is to ensure that transportation planning conducted at the system and programmatic level informs project-level implementation, specifically during the environmental review process. Because system-level planning leads to the programming of various projects, systems-level information should be consistent with the needs of project-level NEPA analysis and integrate without rework or with minimal updating.

This criterion is specifically focused on NEPA, however, an equivalent environmental review process is appropriate.

FHWA's Planning and Environmental Linkages (PEL) Program<sup>1</sup> represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, decisions and products developed during planning to inform the environmental review process". The [PEL website](#)<sup>1</sup> is a resource that describes the connection between the goals and objectives of FHWA's Every Day Counts and their PEL program; includes a set of tools designed to help agencies identify areas where they can strengthen PEL; shares case studies that summarize state and metropolitan approaches to implementing PEL in transportation decision-making; provides an exhaustive set of resources on PEL legislation, regulations, guidance, and implementation; and provides links to available training and workshops.

The agency should have tools and processes in place to ensure analysis, decisions, and documents that are completed during the system planning process, such as corridor, subarea, or metropolitan plans, inform the environmental analysis conducted to meet NEPA requirements during project development. This prevents duplication of work, unnecessary expense, delays, and confusion for the public and policymakers. To successfully link planning to NEPA, it is vital to involve a wide range of partners, including resource and regulatory agencies, NEPA practitioners, planning and development partners, legal counsel, and the public.

## Scoring Requirements

### Requirement SPR-17.1

#### **2 points. Develop Goals and Objectives**

The agency has developed landscape-level goals and objectives for linking system and corridor planning with NEPA documentation and implementing PEL Best Practices.

### Requirement SPR-17.2

#### **1-2 points. Document Linkages between System Planning and NEPA**

Document the following procedures that link system-level planning analyses to project-level NEPA analysis:

- The agency has formal agreements or procedures in place to consult with and involve resource/environmental agencies (including State, local, Tribal, and Federal agencies, including FHWA & FTA) at the systems-level.
- The agency provides public review of system-level planning studies. Both the public and agencies have a reasonable opportunity to comment during the transportation planning process.
- The agency utilizes data sources for system planning that is as consistent as possible with the needs of project-level NEPA analysis (e.g., GIS software, census year, etc.).
- The agency produces documentation of system planning decisions that assists in meeting NEPA documentation requirements. For example, purpose and need statements are developed for major projects recommended in the plan, or examination and elimination of alternatives are adequately assessed and documented at the planning level to meet NEPA needs in later phases.

Documented procedures could include official documentation such as policy and procedures manuals or similar guidance documents, or unofficial documentation such as flowcharts, best practices, or other similar documents.

One of the following scores applies:

- **0 points.** No documented procedures exist or undocumented procedures exist that do not cover all four of the bullets above.
- **1 point.** Undocumented procedures exist that cover all four of the bullets above, or documented procedures exist that cover one or two of the bullets above.
- **2 points.** Documented procedures exist that cover all four of the bullets above.

### Requirement SPR-17.3

#### **2 points. Executive Level Commitment**

The agency can document communication from executive management to staff level regarding agency's commitment to strengthening planning and environment linkages. This might include, but is not limited to:

- Internal memoranda
- Management directives
- Policy statements
- Dedicated resources for integration (staff, funding, time, etc.)

#### **Requirement SPR-17.4**

##### **2-3 points. Consult NEPA Practitioners**

The agency consults with NEPA practitioners throughout the system-level planning process to ensure the material produced is consistent with the needs of downstream use (e.g., project-level NEPA) so that it:

- Can be incorporated into subsequent NEPA documents in accordance with CEQ regulations, and FHWA and FTA guidelines;
- Will aid in establishing or evaluating the purpose and need of the projects, reasonable alternatives, impacts on the built and natural environment, or mitigation measures; and
- Is in a form that is accessible during the NEPA scoping process and can be appended or referenced in the NEPA document.

One of the following scores applies:

- **0 points.** NEPA practitioners are not consulted during system-level planning.
- **2 points.** NEPA practitioners are consulted occasionally but not systematically to help ensure materials are consistent with downstream needs as noted above.
- **3 points.** NEPA practitioners are fully integrated in the planning process to help ensure materials are consistent with downstream needs as noted above.

#### **Requirement SPR-17.5**

##### **2 or 4 points. Apply NEPA Principles and Methods during System Planning**

Planning processes, including long-range, corridor, and sub-area studies, feature components that use NEPA principles and methods and agency successfully incorporates information (e.g., analyses, decisions, and documents) from the system-level planning process into project-level NEPA documents. In addition, clear documentation of conversations, meetings, and decisions is passed from system planning to the project manager of specific projects.

Examples of planning analysis and methods that could be incorporated into NEPA, include:

- Purpose and need or Goals and objectives statements
- Regional development and growth
- Local land use, growth management and development
- Population and employment
- General travel corridor and/or general mode(s) definition Basic description of the environmental setting Preliminary screening of alternatives and elimination of unreasonable alternatives Environmental mitigation activities
- Indirect and cumulative impacts assessment
- Programmatic level mitigation system level measures to avoid, minimize or mitigate impacts of proposed transportation projects

Scoring is based on the following cumulative requirements. The first must be achieved to earn the second.

- **Requirement SPR-17.5a**

##### **2 points. Include NEPA Principles and Methods**

Planning processes, including long-range, corridor, and sub-area studies, feature components that use NEPA principles and methods, including at least 4 of those listed above.

- **Requirement SPR-17.5b**

**2 points. Incorporate Information from System-level to Project-level**

Agency systemically and successfully incorporates information (e.g., analyses, decisions, and documents) from the system-level planning process into project-level NEPA documents.

**Requirement SPR-17.6**

**1-2 points. Demonstrate Sustainable Outcomes**

Scoring is based on the following requirements. The first must be achieved to earn the second.

- **Requirement SPR-17.6a**

**1 point. Include PEL Performance Measures**

Planning and policy documents include PEL implementation performance measures.

- **Requirement SPR-17.6b**

**1 additional point. Monitor Progress and Demonstrate Sustainable Outcomes**

Monitor progress towards goals for at least one year after goal establishment using the performance measures established in SPR-17.6a and show measurable advancement towards stated goals.

## Resources

### Above-Referenced Resources

The following resources are referenced in this criterion and consolidated here:

1. FHWA, Planning and Environmental Linkages website, <http://www.environment.fhwa.dot.gov/integ/index.asp>

### Additional Resources

The following resources provide information on this criterion topic in addition to the sources directly referenced:

2. Federal Register, 23 USC 168 Integration of Planning and the Environmental Review Process, <http://www.gpo.gov/fdsys/pkg/USCODE-2013-title23/pdf/USCODE-2013-title23-chap1-sec168.pdf>
3. Federal Register, 23 USC 169 Development of programmatic mitigation plans, <http://www.gpo.gov/fdsys/pkg/USCODE-2012-title23/pdf/USCODE-2012-title23-chap1-sec169.pdf>
4. Federal Register, 23 CFR 450.212 and 450.318 Transportation Planning Studies and Project Development, <http://www.gpo.gov/fdsys/pkg/CFR-2014-title23-vol1/pdf/CFR-2014-title23-vol1-sec450-212.pdf> and <http://www.gpo.gov/fdsys/pkg/CFR-2014-title23-vol1/pdf/CFR-2014-title23-vol1-sec450-318.pdf>
5. FHWA, Guidance on Using Corridor and Subarea Planning to Inform NEPA (April 2011), [https://www.environment.fhwa.dot.gov/env\\_initiatives/pel/corridor\\_nepa\\_guidance.pdf](https://www.environment.fhwa.dot.gov/env_initiatives/pel/corridor_nepa_guidance.pdf)
6. Federal Register, Appendix A to 23 CFR Part 450—Linking the Transportation Planning and NEPA processes (February 2007), <http://edocket.access.gpo.gov/2007/pdf/07-493.pdf>
7. FHWA, Strategic Sustainability Performance Plan (SSPP) (2011) [https://cms.dot.gov/sites/dot.gov/files/2016%20DOT%20SSPP%20Final\\_Complete\\_Sept\\_2016.pdf](https://cms.dot.gov/sites/dot.gov/files/2016%20DOT%20SSPP%20Final_Complete_Sept_2016.pdf)

## Scoring Sources

The program is considered to have met this criterion if the requirements above can be reasonably substantiated through the existence of one or more of the following documentation sources (or equal where not available):

1. Agency program that specifies the consultation of a NEPA practitioner throughout the system-level transportation planning process.
2. Documentation of how the planning process supports subsequent project development and NEPA work.

3. Written agency procedures for linking the system-level planning process with NEPA.
4. Current case studies showing how transportation system planning results, designed to inform NEPA, were successfully incorporated into the NEPA process and included in the NEPA document, including how the agency can continue to improve that process.