



MEMORANDUM

TO: All District Engineers

FROM: Dianna F. Noble, P. E., Division Director
Environmental Affairs

SUBJECT: Guidance on purpose and need

DATE: July 5, 2001

Background

The National Environmental Policy Act (NEPA) and its subsequent regulations focus on analyzing the social, economic and environmental effects of major federal actions, and this has been the primary focus of FHWA and regulatory agencies in evaluating TxDOT's environmental documents. One of the long-standing requirements of NEPA is that there be a "purpose and need" for major federal actions (43 FR 7609, Section 1502.13). Simply put, the "purpose and need" of a project is why a project is planned, based on established transportation needs.

Federal law requires States and metropolitan areas to develop long-range transportation plans that identify transportation needs for the long-term. Federal law also requires that transportation needs be further defined in Transportation Improvement Programs (TIP) for both metropolitan and rural areas. These planning and programming documents and other planning studies generally focus on long-range goals and objectives and system-wide needs. As such, a more comprehensive study and analysis of the goals and objectives and specific transportation problems are needed at the project level.

The purpose and need statement is the backbone of the NEPA decision making process, establishing the parameters for identifying, comparing, eliminating and recommending alternatives. The purpose and need statement should be based on and supported by information from the planning studies described above. The following is guidance regarding identifying, developing, refining and verifying the purpose and need of a project and in developing the associated purpose and need statement.

What is a purpose and need statement?

- ◆ A written description of the transportation problem and need that a transportation improvement project is intended to address.
- ◆ A clear demonstration that a need exists, and written in such a way as to allow alternatives that can reasonably meet the fundamental need for the project.
- ◆ It delineates critical versus desirable factors. Critical factors are those leading to a "no-build" decision if not met, while desirable factors are those that may be eliminated without leading to an action not being built.
- ◆ Ultimately used for identifying and comparing reasonable alternatives and strategies that address the need, and in ultimately selecting the project alternative.
- ◆ Allows decision makers and the public to weigh the merits of action against the costs and anticipated impacts providing a logical conclusion as to which alternative course of action is most prudent, reasonable and feasible.

Logical termini, independent utility and alternatives

- ◆ Logical termini and independent utility of a proposed action, as well as a defined study area incorporating both the construction termini and the logical termini should be included. (Logical termini and independent utility are demonstrated if the proposed project is a usable stand-alone improvement and a reasonable expenditure of funds even if no additional improvements in the area are made and if the project does not preclude consideration of any potential foreseeable improvements.)
- ◆ Alternatives for other reasonably foreseeable transportation improvements should be discussed. The study area should cover an area that will allow for the consideration of a reasonable range of alternatives that could reasonably meet the purpose and need of the project as well as to include the area that will experience impacts.
- ◆ The purpose and need of the project should be developed in such a manner that a reasonable and full range of alternatives are not eliminated from consideration by explicitly and unnecessarily defining the improvement and by narrowly defining the study area or the project termini.

Content of the purpose and need statement

- ◆ Briefly describe how and where the action is described in the MTP, LRP, TIP and STIP as applicable. If the action is not in one of the above plans and programs, the action must be consistent with the Texas Transportation Plan. If applicable, describe how the project fits in and is described as part of a conforming plan and TIP and CMS.
- ◆ Be sure to describe those regional needs that the project is intending to address, as well as any local needs.
- ◆ If applicable, describe state and/or federal legislation that may be mandating the project and what the legislation says about the project scope, termini, etc.
- ◆ If applicable, describe any studies that have narrowed the corridor, alternatives, mode, and scope of the project. Briefly describe the history, decisions that have been made and the factors influenced prior decisions.
- ◆ Briefly describe how the project fits into the existing transportation system (linkage to system, capacity, projected traffic/transportation demand).

Typical needs

- ◆ *Safety*
- ◆ *Functional deficiency* (capacity, geometry, etc)
- ◆ *Structural deficiency*
- ◆ *Economic development*

For certain transportation projects, your Metropolitan Planning Organization (MPO) may have fully identified the purpose and need and alternatives to address the purpose and need. However, in some cases, the district may have to take the lead in identifying the project's purpose and need and in developing the purpose and need statement itself.

Therefore, I suggest that districts work with the MPO and other transportation agencies. In addition, the Texas Transportation Plan, under development by the Transportation Planning and Programming Division, will also address purpose and need.

Sample Purpose and Need Statements

The project should frame the transportation need in terms of problems rather than solutions.

Examples of a correct way and incorrect way describe a project purpose and need follow:

Correct: *The purpose and need of the proposed improvement of FM XXX is to reduce existing congestion and the further degradation of the level of service.*

Incorrect: *The purpose and need of the proposed improvement of FM XXX is to construct two additional travel lanes in each direction to relieve congestion and to improve reduced congestion.*

The following is an example of a project purpose and need statement and the alternatives investigated:

“The purpose and need of this project is to improve identified operational deficiencies for the 1920 Water Cross bridge at FM 1492, which is eligible for the National Register of Historic Places. The existing structure is a two-lane bridge with no shoulder, while the approaches to the bridge on FM 1492 are four lanes. The existing bridge is physically deficient in that there is a moderate amount of slope failure resulting from a recent high-water event. In addition, the bridge no longer meets TxDOT design standards for a two-lane bridge. The existing ADT is 10,000 vehicles per day, with a predicted 2021 ADT of 40,000. The project is included in the Transportation Improvement Program (TIP) for the MPO region as well as the Statewide Transportation Improvement Program (STIP).

In order to determine the most appropriate course of action, the district office evaluated several potential alternatives to meet the purpose and need of this project, that is, to provide an effective crossing of Water Cross Creek. The following are the alternatives considered:

- ◆ *Rehabilitate the existing bridge for two-way traffic.*
- ◆ *Leave the existing bridge in place for one-way traffic, and build a new bridge parallel to the existing bridge for opposing traffic.*
- ◆ *Leave the existing bridge in place, close it to traffic and build a new bridge parallel to the existing bridge or traffic.*
- ◆ *Leave the existing bridge in place, and divert traffic to a nearby roadway.*
- ◆ *Remove the existing bridge and construct a new bridge on the existing location.*
- ◆ *No-action”*

Please feel free to contact me if you have any questions or need additional information.

MAN/DFN:jcl

cc: Alvin Luedecke, P. E., TPP
Robert Wilson, P.E., DES
All TP&Ds
Irene Rico, P. E., FHWA

bcc: All PM
KCB