

- 200.01 [Introduction and Overview](#)
- 200.02 [Environmental Considerations in Transportation Planning](#)
- 200.03 [Right-sizing](#)
- 200.04 [Federal Planning and Environmental Linkages \(PEL\) Studies](#)

200.01 Introduction and Overview

Transportation planning is a decision-making process that evaluates the transportation system to identify performance issues, consider alternatives, and make recommendations at a corridor, network, or subarea level. It involves engagement with the public, government agencies (federal, state, local, tribal), organizations, and various transportation interests to inform decision-making by:

- Identifying current and future transportation needs.
- Providing opportunities for the public to have a meaningful impact on plans and programs that affect them.
- Identifying environmental resources that need to be protected.
- Maximizing health, safety, and economic well-being.

Transportation plans are required by federal regulations, state laws, and local ordinances and are developed by federal, state, local, and tribal governments. For more information on transportation planning, see the [Joint Transportation Committee Transportation Resource Manual](#) and the [Washington Transportation Plan Phase 2, Appendix A](#).

This chapter describes how environmental considerations can inform decisions during transportation planning. It also describes the federal Planning and Environmental Linkages (PEL) process and the legal requirements for a federal PEL study.

200.02 Environmental Considerations in Transportation Planning

Incorporating environmental and community values early during transportation planning has many benefits, including:

- **Building relationships** – Early consultation and collaboration with tribes, local agencies, and resource agencies improves communication and strengthens relationships.
- **Improving the quality of environmental information** – Early interagency and tribal coordination and data sharing helps to quickly identify environmental priorities and project constraints. It also helps ensure that the best available environmental information is used in planning decisions.

- **Focusing the NEPA/SEPA review** – The early identification of key environmental resources can help tailor the NEPA/SEPA environmental review ([Chapter 400](#)). These include determining environmentally sensitive areas and resources in the project area with lengthy environmental clearance processes that could affect the project schedule and budget.
- **Reducing duplication of effort** – A planning-level environmental review can minimize duplication of effort by carrying forward planning decisions and analysis into the NEPA/SEPA process. This includes Purpose and Need, identification of preliminary alternatives, and the elimination of unreasonable alternatives.
- **Shortening permitting timelines** – Building relationships with permitting agencies can help resolve differences on key issues early in the transportation planning process. This ultimately leads to streamlined permit decisions and project delivery.
- **Delivering better on-the-ground outcomes** – Early and continued coordinated involvement with stakeholders and the public, including historically disadvantaged populations, helps WSDOT create programs and projects that effectively serve the community's transportation needs.

200.03 Right-sizing

Transportation planning can vary greatly in size and scope. Therefore, it's important to right-size efforts to incorporate environmental information. This section describes flexible, scalable, and adaptable approaches to including environmental considerations in plans and planning studies. Region planning and environmental staff should work together to develop the best approach for their planning effort.

An early review of environmental information can inform either future planning level or project level decisions. Examples of planning level decisions include determining the appropriate modal type or whether to toll a corridor. Examples of project level decisions include developing the Purpose and Need, refining alternatives, and identifying stakeholders and potential site-specific concerns. These efforts can also be spatially scaled, from studying a major corridor to planning for an intersection improvement.

Some planning products propose recommendations or strategies that will not develop into a specific project. Examples include the Washington Transportation Plan, Highway System Plan, Public Transportation Plan, Active Transportation Plan, Aviation System Plan, Freight Plan, Rail Plan, Ferry Long Range Plan, and some planning studies. At a minimum, refer to the following guidance materials during the development of these planning products:

- [Guidance for Considering Impacts of Climate Change in WSDOT Plans](#)
- [Community Engagement Plan](#)

Other planning products propose recommendations that may develop into one or more projects. These include regional or corridor planning studies. In addition to the guidance materials above, use the GIS Workbench to conduct a planning-level environmental screening of the following:

- Fish passage barriers.
- Climate vulnerability.
- Stormwater facilities and retrofit priorities.
- Wetland mitigation sites.
- Habitat connectivity priorities and areas with high risk of animal vehicle collisions.
- Chronic environmental deficiencies (streambank erosion risks).
- Noise walls.
- Historic bridges.

This level of environmental screening should:

- Identify existing environmental assets that must be protected.
- Detect other key environmental factors that have the potential to influence the scope of future investments.
- Determine if additional environmental review is necessary prior to project development.

However, this high-level screening does not examine the full range of environmental and social issues that may need in-depth review during site-specific project development. Additional environmental data will likely need to be collected and analyzed in more detail once potential project locations and solutions become clearer.

If a planning effort is leading to a defined project please work with your environmental staff to determine the likely environmental classification. There are two paths depending on potential project-level environmental review. First, if the future project is likely to be classified as a NEPA/SEPA Categorical Exclusion or require a SEPA checklist, then a more thorough planning-level environmental review is recommended. Typically, these are less complex projects that do not require a formal process for defining Purpose and Need, alternatives screening, or public involvement. However, a level of review that includes some or all of the relevant information in WSDOT's Environmental Review Summary and Environmental Classification Summary database can help develop early strategies to avoid or minimize environmental impacts.

Second, if the plan is likely to recommend a large or complex transportation investment project we recommend considering the streamlining benefits of following the federal Planning and Environmental Linkage (PEL) process. One key is whether or not the planning effort will include consideration of alternatives. The federal PEL process, described in Section 200.05, can help develop and refine alternatives to evaluate in future NEPA/SEPA processes and make sure the public engagement counts towards NEPA/SEPA project-level scoping.

200.04 Federal Planning and Environmental Linkages (PEL) Studies

Federal PEL studies are generally recommended for plans or planning studies that are likely to lead to a capital improvement or a major choice to implement on a corridor. The following sections describe the requirements and benefits of a federal PEL study. The outcome of a federal PEL study is incorporated into a NEPA EA or EIS. A similar process that achieves similar benefits can also be used to inform a SEPA EIS. However, a federal PEL study does not determine the level of future NEPA or SEPA documentation - this is determined during the NEPA/SEPA process.

200.04(1) *PEL Authorizations and One Federal Decision*

Federal regulations applicable to FHWA and FTA have included provisions on PEL for State DOTs since 1998. Since then, Congress has further encouraged the use of federal PELs to gain more value from planning efforts. These regulations are provided in [23 CFR 450.212](#) and [23 USC 168](#): Integration of planning and environmental review.

[Presidential Executive Order 13807](#), commonly referred to as 'One Federal Decision' (OFD), was issued in August 2017. OFD requires federal agencies to process environmental reviews and authorizations for NEPA EIS projects as a single record of decision. OFD also sets a goal of reducing the average time for each agency to complete the required environmental review and authorization decisions to two years. This directive increases emphasis on pre-scoping and federal PEL studies to streamline the NEPA review and authorization processes.

200.04(2) *PEL Documentation*

The federal requirements for PEL are written with larger, NEPA EA/EIS, projects in mind. A PEL study should include enough information to show that the study fulfills the requirements in [23 USC 168](#). The study should be right-sized, with the appropriate type and amount of analysis for use in future planning or NEPA.

The federal PEL study needs to clearly state the purpose of the study. For example, the purpose of the study may be to establish the Purpose and Need or to eliminate unreasonable alternatives. Concurrence with relevant resource agencies is required to eliminate any alternatives.

FHWA created a [PEL questionnaire](#) that helps with documentation and the transition from planning to NEPA. The questionnaire is consistent with the planning regulations for FHWA and FTA ([23 CFR 450](#)) and should be included in the final PEL document as an executive summary, chapter, or appendix. These questions should be used as a guide throughout the PEL process, not just completed near the end of the process.

The final PEL document may also contain other substantive materials, such as technical letters, memos, or reports. Example content includes:

- Purpose and Need.
- Project goals.
- Alternatives development and evaluation criteria.
- Recommended alternative(s).

- Logical termini and independent utility.
- Transportation analysis.
- Affected environment and mitigation strategies.
- Agency coordination and public involvement.

The study objective should determine the relevant content.

200.04(3) Adoption of PEL planning products into NEPA

PEL and NEPA are separate, distinct processes. However, the purpose of applying the federal PEL process is to inform the environmental review under NEPA.

At the beginning of a federal PEL study, the planning team and their federal lead (FHWA or FTA) should decide how the work may later be incorporated into subsequent NEPA efforts. A key consideration is how the PEL study will meet standards established by NEPA regulations and guidance. One example is the use of terminology consistent with NEPA vocabulary (e.g. Purpose and Need, alternatives, affected environment, environmental consequences). Decisions made during a PEL process must also be documented in a format that can be included in the NEPA document as an appendix or by reference.

The current federal authorization for PEL defines a statutory process for adopting or referencing planning products for use in NEPA ([23 U.S.C. 168](#), [23 CFR 450.212\(d\)](#), [23 CFR 450.318\(e\)](#)). The term “planning product” means a decision, analysis, study, or other documented information that is the result of an evaluation or decision-making process during transportation planning ([23 USC 168\(a\)\(3\)](#)).

The conditions that must be met in order for FHWA or FTA to use planning products in the environmental review process are provided in [23 USC 168\(d\)](#). These requirements (paraphrased) include:

- The planning product was developed through a planning process that was conducted in accordance with applicable federal law.
- The planning product was developed in consultation with the appropriate federal and state resource agencies and Native American tribes.
- The planning product was the result of a planning process that included multidisciplinary consideration of systems-level or corridor-wide transportation needs and potential effects on the human and natural environment.
- During the planning process, public notice was provided that resulting planning products may be adopted during a subsequent environmental review process.
- During the environmental review process, a notice of intent to incorporate a planning product must be provided. The planning documents must also be provided for review and comment by the public, as well as interested federal, state, local, and tribal governments. Any resulting comments must be considered.

- There is no significant new information or circumstance that have reasonable likelihood of affecting the continued validity or appropriateness of the planning product.
- The planning product has a rational basis centered on reliable and reasonably current data and scientific methods.
- 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.
- The planning product is appropriate for adoption and use in the environmental review process.
- The planning product was approved within 5 years of the date used in the environmental review process.

Additionally, there must be concurrence with the federal lead agency to adopt a planning product into NEPA. If the planning product is necessary for another agency to issue a permit, review, or approval for the project, then there must also be concurrence with that agency ([23 USC 168\(d\)](#)).

For more information on integrating transportation planning and environmental review, including technical guidance for project teams, see WSDOT's [Environmental Planning and PEL webpage](#).