

WisDOT Planning and Environmental Linkages (PEL) Policy Paper

(For WisDOT Led Projects)

Purpose of this policy paper

This policy paper provides the following:

- Background on the Planning and Environmental Linkages (PEL) process.
- Benefits associated with PEL.
- Scenarios to implement a PEL process, or study, to better inform WisDOT staff and project teams of when a PEL process, or study, may be beneficial to complete prior to initializing future project phases, including initializing a National Environmental Policy Act (NEPA) document for a proposed project.

What is Planning and Environmental Linkages (PEL) and its general steps?

Planning and Environmental Linkages (PEL) is an approach to transportation decision-making that allows decisions made during the planning process to potentially be carried forward into the NEPA process. PEL requires that decisions made during planning receive public involvement and resource agency coordination to be able to be brought into the environmental review process under NEPA. Planning studies and documents are used by planning agencies, including state departments of transportation, metropolitan planning organizations (MPOs) and local project sponsors to guide transportation project delivery. At this time, this policy is meant only for WisDOT led projects.

There are different processes that can be followed to complete PEL requirements. The requirements can be found in 23 USC 168 or 23 CFR 450. Review these processes and determine with the region environmental coordinator (REC), WisDOT Environmental Process and Documentation Section (EPDS), and the Federal Highway Administration (FHWA) as to which best suits the needs of the study.

Project teams should refer to and follow FHWA's PEL guidance documents when setting goals. The FHWA PEL guidance can be found on the FHWA Environmental Review Toolkit website. For assistance locating these materials, please check with the REC.

While a PEL study addresses some aspects of NEPA, it is not a substitute for the NEPA process. Based on the goals, the scope of the PEL study may focus on planning issues, defining project purpose and need, identifying alternatives, preliminary identification of resources and impacts, and/or potential mitigation measures. Appropriate public and agency involvement are necessary to advance planning products into a timely NEPA process. If there is a delay between the development of the planning products and the initiation of NEPA, it may be necessary to re-review the planning products.

A PEL process will have identified coordination points with FHWA, as well as identified coordination points with resource agencies and the public as the study progresses.

The PEL scope of work should include sufficient public involvement and resource agency coordination to support decision-making and should include the development of planning products, such as the PEL study report and completion of FHWA's PEL questionnaire. For the location of the FHWA PEL questionnaire, please consult with the REC.

What are the benefits of PEL?

As transportation infrastructure continues to age in Wisconsin, and resources (staff and funding) fluctuate, there is an opportunity to maximize the planning and programming process via PEL to ready project concepts for NEPA analysis.

Some benefits PEL offers WisDOT include:

- Minimizes duplication of effort in both planning and environmental processes.
- Manages funding questions or challenges.
- Identifies appropriate ways to properly assess project purpose and need prior to NEPA.
- Provides opportunities for early resource agency coordination and public involvement, particularly when there are complex project needs and, or potentially significant impacts.
- May reduce delays in project delivery timeframes and implementation.
- Provides opportunities for early identification of environmental resources, impacts, and mitigation prior to NEPA.
- May offer opportunities for development of programmatic mitigation for multiple transportation project impacts.

What types of project scenarios are suitable for PEL?

Please consult with the REC if there are questions about PEL being appropriate for a WisDOT project. The REC will check with EPDS in central office as well as planning and programming staff, as needed, and FHWA staff.

The bulleted list of scenarios below are examples of when PEL could be an appropriate approach to consider for a transportation need.

- Large geographic scale that could result in multiple programmable projects with independent utility and logical termini.
- Known or anticipated public interest about scope, purpose and need, and/or possible alternatives.
- Complex environmental impacts or constraints.
- Purpose and need are unclear or requires additional definition.

- Too many possible alternatives for an efficient NEPA process.
- Full funding is not programmed, or a project is not fiscally constrained.
- A proposed transportation corridor includes multimodal alternatives and a NEPA analysis may be done for each mode independently.
- When there is a need for the development of programmatic mitigation for multiple transportation project impacts.
- There is a need for enhanced coordination between Tribal, federal, state, and/or local agencies. For example, WisDOT needs to coordinate project plans with an MPO planning process.

When is a PEL not appropriate?

A PEL may not be the appropriate approach in all cases. The bullets below explain when a PEL might not be a useful approach to link planning and environmental processes.

- A proposed transportation project is straightforward and does not have complex impacts.
- Projects with a clear scope. For example, projects appropriately scoped as a categorical exclusion.
- Projects with no controversy or not a high level of public interest.
- Funding is already identified for the proposed project in the State Transportation Improvement Program (STIP) (and Transportation Improvement Program (TIP), as applicable). The project is already fiscally constrained, and the project has a STIP label.
- The project meets NEPA timelines for EAs and EISs and permitting timelines.
- Projects without a federal nexus – no federal funding or federal approvals (including those delegated to WisDOT per the Stewardship and Oversight Agreement).

Projects with the above scenarios are in a good position to begin NEPA instead of a PEL process.

How does PEL work?

PEL requirements can be found in either 23 USC 168 or 23 CFR 450.

The primary objective of the PEL process is to assess transportation needs and priorities and ensure early engagement with both the public and (Tribal/Federal/State/Local) resource agencies. Assessment can be on a program level, more regionally, or at a more localized/project level. Project-level PEL studies can range from corridor studies to more localized studies, such as an interchange improvement. In all types of PEL studies, the goal is to gather enough detail so that the information developed can be used in future planning or NEPA decisions.

The PEL process may identify components of purpose and need, logical termini, independent utility, and alternatives (including the no build). It should identify known features in the human and natural environment that may be impacted and may also identify likely points of

controversy or environmental obstacles. These elements provide the groundwork for NEPA documents for the proposed projects that result from the PEL process.

A PEL process is conducted before NEPA and NEPA timelines begin. A PEL process often occurs before all project construction funding is identified (before fiscal constraint/a project has a STIP label), and before project issues are fully known or proposed solutions have been considered. During a PEL process, planning decisions can be made by the project team and information can be gathered for planning analysis.

The decisions and analyses conducted during the PEL may be used for the following:

- identify and prioritize future projects
- develop the purpose and need for a project
- determine project size or length
- develop and refine a reasonable range of alternatives to carry forward
- identify stakeholders and issues of potential concern
- prioritize future projects
- develop key components for future analysis

PEL may also be used to determine what financial measures are needed or what type of proposed action, including modal choices, might meet identified project needs.

Who should be involved with PEL?

If a project team is considering PEL, first speak with the REC. The REC will reach out to EPDS and FHWA, if needed, and planning and programming staff, if needed. PEL is multi-disciplinary and will usually involve programming, planning, and environmental staff, as well as FHWA.

- Who to contact to determine if a PEL should be prepared:
 - REC – the REC should be the first line of contact for project teams
 - EPDS liaison
 - Region planning and programming staff
 - FHWA
 - FTA – If appropriate
 - FRA – If appropriate
 - FAA – If appropriate
 - MPO – If appropriate (If not currently in the long-range plan)
- Who should lead/co-lead or start/complete and then transfer the PEL decision

- WisDOT environmental staff with check ins, as appropriate, with WisDOT planning and programming staff in both central office and the regions as well as FHWA.

Where can additional information be found?

General information about PEL is available at: [Planning and Environment Linkages | Environmental Initiatives | Environmental Review Toolkit | FHWA](#)

The FHWA PEL questionnaire is available at:
https://www.environment.fhwa.dot.gov/env_initiatives/pel/pel_quest.aspx

The FHWA PEL Handbook is available at:
[Planning and Environment Linkages Handbook](#)

The FHWA PEL Frequently Asked Questions is available at:
[November 2, 2016 - PEL - Legislation, Regulations, & Guidance - Planning, Environment, & Real Estate - FHWA](#)

Colorado DOT PEL Handbook is available at:
[Planning and Environmental Linkages \(PEL\) Handbook](#)