



Understanding planning and environmental linkages (PEL)

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Planning and Environmental Linkages, or PEL, is a process that allows information, analysis and decisions made during planning (i.e. pre-NEPA) to be used or relied upon during environmental review. A PEL process can be used to support program-level decisions, such as transportation funding options, or project-level decisions, such as defining purpose and need or screening alternatives. Using the PEL process can minimize potential duplication between the planning and NEPA processes, which can lead to more efficient project delivery.

What are the benefits of using the PEL process?

Due to its flexibility, the PEL process offers multiple advantages, which can lead to greater efficiencies including:

- Minimizing duplication between planning and environmental review processes
- Narrowing the scope of the environmental review process
- Reducing uncertainty by developing a study that leads to a defined project with a clear scope of work and costs; engaging study stakeholders earlier in the decision-making process to understand issues and reduce risk and concerns; and defining baseline environmental conditions to identify potential constraints and lead to better environmental outcomes
- Promoting development of purpose and need, including initial alternatives screening, especially when the project has not been funded
- Helping determine NEPA class of action for a proposed action and potentially lowering the class of action
- Identifying logical termini and future project(s) with independent utility, as well as defining a recommended project phasing plan, which can also be used to inform and update the local MPO's long-range plan

A PEL process may not make sense when:

- Goals and objectives of the study are unclear
- Transportation problems and potential solutions are already well defined
- Data needed to support decision-making already exists in a different study or is documented in a separate analysis
- Project is fully funded for construction
- Time between completion of the PEL process and initiation of the NEPA process renders the PEL analysis invalid or irrelevant

What does the PEL process require?

PEL processes, and their associated requirements, can vary based on several factors, including the lead federal agency, the overarching goals and objectives, as well as the specific PEL process authority used.

There are four basic elements that apply to the PEL process - regardless of the specific authority used. These elements include:

1. **Agency coordination/involvement:** Include state, local, tribal, and federal agencies, as appropriate and depending on the specific PEL authority and circumstances
2. **Public involvement:** Early and ongoing meaningful public involvement is critically important
3. **Documentation:** Analyses and decisions are clearly documented and readily available for review and reference - both during the PEL and NEPA processes

4. **Lead agency review and involvement:** The tactical approach can vary, but the basic idea is to engage the lead agency in the process to confirm the requirements are met

One specific tool worth mentioning is the PEL questionnaire developed by the Federal Highway Administration. FHWA uses the questionnaire to help determine if the work completed and process utilized during planning meets the relevant requirements to carry forward into NEPA.

Where have PEL processes been successfully used?

Although the existing PEL process framework was added to the FHWA and FTA planning regulations in 2007, it has received greater attention in recent years due to multiple factors. Both the Federal Transit Administration (FTA) and FHWA have encouraged the use of PEL processes to support project delivery. According to data published by the FHWA, PEL processes are being used by several state departments of transportation to shorten project delivery. Additionally, FTA has integrated PEL into its Environmental Standard Operating Procedures and several transit agencies and authorities have integrated PEL principles into their project development processes.

Where should we start?

The PEL process can be an effective tool to support program or project delivery; however, each situation is unique. Therefore, it's important to complete an early assessment of goals and objectives to confirm the PEL process is the appropriate tool. Additionally, PEL processes and their associated requirements could vary based on several factors, including the lead agency, the overarching goals and objectives, as well as the specific PEL process authority used.

Due to these varying factors, it's important to develop and implement a technical approach that considers all of them. This will require a multi-disciplinary technical team, as well as proactive engagement of the lead agency to confirm the applicable requirements are met.

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