Purpose and Need – MnDOT
Experiences and Expectations

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Re-Cap: Why P&N is important

• P&N statement is needed:
  1) for EIS and EA projects
  2) for Cat Ex projects with Section 106, Section 4(f) and/or Section 404 issues
Why P&N is important

• Clear, well-defined P&N forms basis for …
  – Justifying expenditure of large amount of money on projects with significant impacts
  – *Project scope (and cost) containment*
  – Comparison of impacts among alternatives
  – Comparison to doing nothing
P&N Approach

• Hierarchy of Needs
  – Primary = Main problem(s) to be solved (why are we here??)
  – Secondary = Additional opportunities and/or major considerations (to be taken into account in developing and/or evaluating alternatives)
  – ‘Other Considerations’ = other evaluation factors
P&N Approach

• Defining the problem
  – Be as specific as possible in defining the problem(s), for example:
    • Safety – ‘there is a high incidence of rear-end crashes on TH 199 at the intersection with CSAH 99.’ NOT ‘crash rates in the TH 199 corridor are above the state-wide average rate for similar highway facilities.’
P&N Approach

• State the Problem, not the Solution, e.g.:
  – Say: ‘Analysis of operations on this two-lane roadway indicate it currently operates at LOS F during the AM and PM peak hours. There is a need to provide adequate capacity to accommodate existing and forecast peak hour traffic at LOS D.’ NOT ‘The roadway needs to be expanded to a four-lane freeway.’
P&N Approach

• State the Problem, not the Solution, e.g.:
  – Say: ‘The bridge has structural deficiencies that need to be addressed, to provide a safe river crossing.’ NOT ‘The bridge needs to be replaced.’
P&N Approach

• State the Problem, not the Solution, e.g.:
  – Say: ‘There is a need to provide safe access to the highway at this location.’  **NOT** ‘There is a need to construct an interchange at this location.’
P&N Approach

• Don’t be so specific that you limit alternatives or design flexibility. Do not define ‘design standards’ (e.g., do not specify lane widths, design speeds, etc.)
P&N Approach

• P&N may be re-examined and updated during the project development process, based on new information and stakeholder input
P&N Importance

- P&N is considered by many to be the most important NEPA step
- P&N is foundation for our building blocks, i.e., the build alternatives
- Critical in meeting requirements of NEPA, Section 4(f), Section 404, etc
P&N – Coordination & Concurrence

• EA, EIS, and Cat Ex (if Section 106, Section 4(f) or Section 404) processes should include concurrence on P&N statement

• Coordination/Concurrence
  – TH projects – OES, FHWA, Corps (?, if 404)
  – State Aid projects – State Aid Staff, FHWA , Corps (?, if 404)
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• State Aid projects – State Aid Staff