



Guidance

Preparing a Purpose and Need Statement

This guidance explains how to comply with the Texas Department of Transportation standards for preparing a purpose and need statement to include in an environmental assessment or environmental impact statement.

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1.0 Introduction

This guidance explains how to comply with the Texas Department of Transportation (TxDOT) standards for preparing a purpose and need statement to include in an environmental assessment (EA) or environmental impact statement (EIS). Any EA or EIS containing a purpose and need statement that does not substantially comply with these standards cannot be approved for further processing by the Environmental Affairs Division (ENV).

2.0 Location in EA or EIS

Each EA and EIS must contain a purpose and need statement. The statement must be clearly identified by its own heading within the EA or EIS and included as its own line in the table of contents. The statement must be located near the very beginning of the EA or EIS, prior to discussion of project alternatives.

3.0 Statement Length

The purpose and need statement is concise and generally not longer than one or two paragraphs, as described in Section 4.0.

4.0 Content Standards

The purpose and need statement explains why TxDOT is developing a project and provides a basis for the development and evaluation of project alternatives. Each alternative must be analyzed in terms of the extent to which it will or will not satisfy the purpose and need of the project. The statement consists of three basic components, as described in Sections 4.1 and 4.2.

In the Federal Highway Administration (FHWA) guidance and the Council on Environmental Quality rules, the two agencies refer to the purpose and need statement, with the word purpose preceding the word need. However, in the statement, the explanation of the need always precedes the explanation of the purpose to reflect more accurately the principle that the purpose of a TxDOT project is driven by the need for that project.

4.1 Need

The need part of the statement always begins with a single sentence explaining the need driving the project. The need sentence is followed by supporting facts and/or data for that need.

4.1.1 Sentence

As shown in the following example, the need sentence includes the transportation-related problems or unsatisfactory conditions the project is needed to address. Refer to Section 4.1.2 for common types of problems or unsatisfactory conditions to list in this sentence.

This project is needed because the capacity of FM 1234 between the intersections with Elm St. and Maple St. is inadequate to meet current and future traffic volumes, resulting in congestion, reduced mobility, and a Level of Service of 'F' on this stretch of highway.

Summarizing the need for the project in a single sentence provides a high level of clarity, facilitating the comparison and evaluation of project alternatives. Additional elaboration or explanation of the concepts underlying the need sentence is required and included in subsequent sentences or paragraphs of the statement, as described in Section 4.1.2.

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For many projects, only one specific transportation-related problem or unsatisfactory condition necessitates the project. In such cases, the need sentence is limited to that single problem or unsatisfactory condition, and there is no need to bolster the statement further by creating additional justifications for the project.

For projects addressing multiple, transportation-related problems or unsatisfactory conditions, clearly identify and list each problem or unsatisfactory condition individually in the need sentence, as shown in the following example.

The project is needed because FM 1234 between the intersections with Elm St. and Maple St. (a) is inadequate to meet current and future traffic volumes, resulting in congestion, reduced mobility, and a Level of Service of 'F' on this stretch of highway, and (b) does not meet current design standards as the travel lanes are too narrow and there are no shoulders.

4.1.2 Supporting Facts and/or Data

In the paragraph immediately following the need sentence, provide specific facts and/or data supporting each problem or unsatisfactory condition identified in the need sentence. It is not sufficient to state just the transportation-related problem or unsatisfactory condition, without providing facts and data supporting the existence of that problem or condition. FHWA explains this concept in its guidance document titled, [“The Importance of Purpose and Need in Environmental Documents”](#) as follows.

“The purpose and need should be as comprehensive and specific as possible. For example, rather than simply stating that additional capacity is needed between two points, information on the adequacy of current facilities to handle the present and projected traffic, (e.g., what capacity is needed and the level of service for the existing and proposed facilities) should be discussed. Other information on factors such as safety, system linkage, social demands, economic development, and model interrelationships, etc., that the proposed project will attempt to address, should be described as fully as possible.”

If the need for the project is not substantiated by facts and/or data, then it is inadequate and will not be approved by ENV.

The following list of common types of problems or unsatisfactory conditions includes a general description of the types of supporting facts and data appropriate for those problems and conditions.

- **Safety:** Describe the crash history, relating the history to similar roadways, as appropriate. Identify any design or operational issues leading to safety problems, such as vehicles having to make unprotected left turns.
- **Congestion and/or mobility:** Discuss the capacity of the existing facility and its ability to meet current and future traffic volumes. Provide historical, present, and projected traffic volumes and levels of service. Describe any trends in land use and population leading to congestion.
- **Failure to meet current design standards:** Explain the existing roadway and the ways it does not meet current design standards, such as load limit, geometrics, lack of turning lanes, etc.

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- **System connectivity:** Explain how the existing transportation system within the project area interfaces and connects with other facilities. Identify any connectivity problems.
- **Law/policy:** Identify any federal, state, or local governmental mandate or policy requiring the project.

Some project aspects determined in the transportation planning process can be included with the explanation of facts and/or data supporting the need sentence. Refer to [Appendix A to Part 450](#) (23 CFR 450) and the Planning and Environmental Linkages (PEL) Section of the TxDOT [NEPA and Project Development Toolkit](#) for additional details concerning linking the transportation planning and project development processes. As an example of one such aspect, funding information may be included to the extent that the financial plan for a metropolitan transportation plan indicates that funding for a specific project will require special funding sources, such as tolls or public-private financing. As another example, a general travel corridor or general mode or modes – such as a highway, transit, or highway and transit combination – resulting from planning analyses can be included.

In almost all cases, it is neither necessary nor appropriate to prepare a separate Purpose and Need technical report, as the supporting facts and/or data can be summarized within the body of the EA or EIS. In cases where separate, pre-existing reports or other documents are relied upon for the supporting facts and/or data, such as bridge inspection reports or traffic modeling reports, include citations to such documents within the discussion of the supporting facts and/or data. In rare instances it may be necessary to prepare a separate Purpose and Need technical report due to the complexity of the supporting facts and/or data; however, ENV should be consulted prior to preparing a separate Purpose and Need technical report.

4.2 Purpose

The purpose and need statement always concludes with a single sentence explaining that the purpose of the project is to address the transportation-related problems or unsatisfactory conditions previously identified in the need sentence. Summarizing the purpose for the project in a single sentence provides a high level of clarity, facilitating the comparison and evaluation of alternatives. The first sentence explaining the need and the last sentence explaining the purpose must be consistent, focusing on the same transportation-related problems or unsatisfactory conditions, as shown in the following two examples.

For example, consider a project with the following need sentence.

This project is needed because the capacity of FM 1234 between the intersections with Elm St. and Maple St. is inadequate to meet current and future traffic volumes, resulting in congestion and reduced mobility on this stretch of highway.

The following is an example of an appropriate, consistent purpose sentence.

The purpose of the project is to reduce congestion and improve mobility on FM 1234 between the intersections with Elm St. and Maple St.

The purpose sentence must not identify or describe the preferred alternative, be so narrowly written as to unreasonably limit the consideration of alternatives to address the need, or leave construction of the preferred alternative as the only alternative possible to fulfill the purpose. As an example of what not to write, consider the following sentence.

The purpose of the project is to widen the two-lane road to four lanes to relieve congestion.

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In this example, widening the two-lane road to four lanes is not the purpose, but rather one alternative for accomplishing the true purpose of relieving congestion.

Likewise, the purpose sentence must not be overly broad, as it is in the following example of what not to write.

The purpose of the project is to improve traffic mobility in Austin.

This sentence is overly broad because it invites the consideration of a near infinite number of alternatives. In summary, the purpose sentence must be neither unreasonably narrow nor unreasonably broad, and the sentence must allow for consideration of multiple alternatives.

5.0 Additional Guiding Principles

Ensure the additional principles listed below are followed when preparing a purpose and need statement.

- Limit the explanation of problems or unsatisfactory conditions to those for which a solution is truly needed. The more focused and concise the statement, the easier it is to compare and evaluate alternatives.
- Do not include non-transportation-related issues or outcomes and goals that are merely desirable, not essential. For example, do not include the minimization of environmental impacts, as it is not a transportation-related problem or unsatisfactory condition.
- Do not rely exclusively on planning documents, such as the statewide transportation improvement program (STIP), to justify the project. It is not sufficient to merely state that the project is called for by the STIP or the metropolitan planning organization's plans, as this does not explain the true need and purpose of the project.
- Do not discuss any alternatives in the purpose and need statement. Instead, project alternatives are discussed and evaluated in the Alternatives Section of the EA or EIS.
- Do not discuss the proposed project, any element or feature of the proposed project, any build alternative, or any future build scenario (concerning traffic, safety, etc.) in the Supporting Facts and/or Data section. Instead, the Supporting Facts and/or Data section should focus on the **existing facility's** deficiencies.

6.0 Acronyms

EA	Environmental Assessment
EIS	Environmental Impact Statement
ENV	Environmental Affairs Division of TxDOT
FHWA	Federal Highway Administration
FM	Farm to Market Road
STIP	Statewide Transportation Improvement Program
TxDOT	Texas Department of Transportation

Appendix A: Revision History

The following table shows the revision history for this guidance document.

Revision History	
Effective Date Month, Year	Reason for and Description of Change
December 2022	Version 4 was released. <ul style="list-style-type: none">• Removed references to outdated ENV SOPs• Added a bullet point on page 6 emphasizing that no aspect of the proposed build alternative(s) should be discussed in the Supporting Facts and/or Data section. Instead, the Supporting Facts and/or Data section should focus on the <u>existing facility's</u> deficiencies
October 5, 2017	Version 3 was released. Removed the phrase, "which present safety hazards" from the sample need statement on page 4.
October 1, 2017	Version 2 was released. Section 4.1.2 was revised to clarify that in almost all cases a Purpose and Need technical report is not required, and that ENV should be consulted before proceeding with preparing a Purpose and Need technical report. The document number changed to from 165.01.GUI to 110.02.GUI to due catalog document number issues
November 2015	Version 1 was released.